UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
WATER AND
WATERSHEDS

Reply to Attn of: OWW-191

DEC 06 2017

Patrick Clark
Staker Parsons Companies
2350 South 1900 West
Ogden, UT 84401

Re: Additional Monitoring Requirements for the Cooper Pit under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053248

Dear Mr. Clark:

The purpose of this letter is to notify you of watershed specific monitoring requirements that must be implemented at your facility to maintain permit coverage under the U.S. Environmental Protection Agency's (EPA) 2015 Multi-Sector General Permit for Storm water Discharges Associated with Industrial Activity (MSGP). Based on the information provided in your Notice of Intent (NOI), storm water from the Cooper Pit at Highway 26 and Wagner Road in Caldwell, Idaho discharges into the Boise River. This stretch of the Boise River is listed as impaired for temperature, fecal coliform bacteria as measured by *Escherichia coli*, flow regime alterations, habitat alterations, phosphorus, and sedimentation/ siltation as measured by total suspended solids (TSS). The State of Idaho Department of Environmental Quality (IDEQ) has established Total Daily Maximum Loads (TMDL) for TSS, TP, and bacteria for the Boise River.

Basis for EPA to Add Additional Requirements

Part 2.2.2.1 of the MSGP, Existing Discharge to an Impaired Water with an EPA Approved or Established TMDL, states, "If you discharge to an impaired water with an EPA-approved or established TMDL, EPA will inform you whether any additional measures are necessary for your discharge to be consistent with the assumptions and requirements of the applicable TMDL and its wasteload allocation, or if coverage under an individual permit is necessary per Part 1.2.3." See also Part 6.2.5 of the MSGP (allowing EPA to notify a facility of additional monitoring requirements).

Specific Requirements

Pursuant to Part 2.2.2.1 and 6.2.4.1 of the MSGP, the Facility is required to conduct storm water monitoring for TP and TSS following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1.

Bacteria: For bacteria, the target is a 126 Geometric Mean or 406 Instantaneous Maximum colony forming units per 100 ml. However, the Lower Boise River TMDL identifies that normal sand and gravel operations do not discharge bacteria. As a result, bacteria monitoring requirements do not apply to this facility.

Parameter	Target Values	Source of Value
TSS	33 mg/L	Lower Boise River TMDL, 2015 Sediment and Bacteria Addendum, Table 27
Total Phosphorus	0.1 mg/L May 1-Sept 30 0.35 mg/L Oct 1- April 30	2015 Lower Boise River TMDL, Total Phosphorus Addendum

If you have any questions, please contact Margaret McCauley of my staff at mccauley.margaret@epa.gov or (206) 553–1772.

Sincerely,

Susan Poulsom

Susan Poulsom, Acting Manager
NPDES Permits Unit

cc: Lance Holloway, Idaho Department of Environmental Quality