



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
WATER AND
WATERSHEDS

DEC 18 2015

Reply to Attn of: OWW-191

Staker Parson Companies
ATTN: Patrick Clark
P.O. Box 3429
Ogden, Utah 84409

Re: Additional Monitoring Requirements for Idaho Concrete, Twin Falls under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053056

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 Stormwater Discharges Associated with Industrial Activity (MSGP). Based on the information provided in your Notice of Intent (NOI), storm water from the Idaho Concrete facility at 1294 Addison Ave West in Twin Falls, Idaho (Facility) discharges into Rock Creek. Rock Creek is listed as impaired for fecal coliform bacteria as measured by Escherichia coli (e.coli), flow regime alterations, phosphorus, sedimentation / siltation, and total suspended solids (TSS). In addition, the State of Idaho Department of Environmental Quality (IDEQ) has established Total Maximum Daily Loads (TMDLs) for TSS, total phosphorus (TP), and e.coli.

Basis for EPA to Add Additional Requirements

Part 2.2.2.1 of the MSGP 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

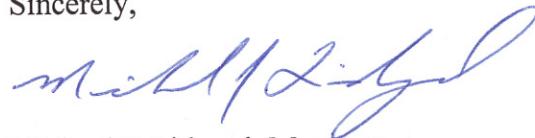
Pursuant to Parts 2.2.2.1 and 6.2.4.1 of the MSGP, the Facility is required to conduct storm water monitoring for TP and e.coli following the standard benchmark monitoring procedures outlined in the MSGP at Section 6.2.1. Please note that the TSS benchmark for Rock Creek is lower than the standard MSGP benchmark value for the industrial category applicable to your Facility.

Parameter	Benchmark Values	Source of Value
TSS	52 mg/L	2010 IDEQ Integrated Report and 2005 Upper Snake Rock TMDL

TP	0.100 mg/L	2010 IDEQ Integrated Report and 2005 Upper Snake Rock TMDL
e. coli	126 colony forming units /100 mL (geometric mean) with a "trigger" value of 406 colony forming units /100 mL	2010 IDEQ Integrated Report and 2005 Upper Snake Rock TMDL

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

Sincerely,



Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Dr. Balthasar Buhidar, Idaho Department of Environmental Quality