



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
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Seattle, WA 98101-3140

OFFICE OF  
WATER AND  
WATERSHEDS

FEB 04 2016

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 Middleton Facility, Caldwell under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053062

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 21250 Middleton Rd in Caldwell, Idaho (Facility) discharges into the lower Boise River. The lower Boise River is listed as impaired for fecal coliform bacteria as measured by *Escherichia coli* (*E.coli*), total phosphorus, flow regime alterations, habitat alterations, temperature, and total suspended solids (TSS). The State of Idaho Department of Environmental Quality (IDEQ) has established TMDLs for TSS, total phosphorus, and *E. coli* the lower 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 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 TSS following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1.

As the TMDL targets<sup>1</sup> for sediment as TSS are above the effluent limit for this industrial category, the quarterly results are to be compared to the 25 mg/L effluent limit.

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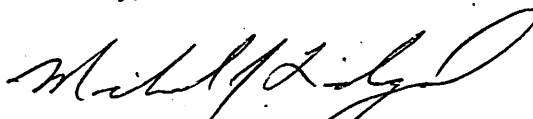
<sup>1</sup> The TMDL target for sediment as TSS is no more than 50 mg/L for 60 days and no more than 80 mg/L for 14 days between April 1 and September 30.

The Lower Boise River TMDL identifies that normal sand and gravel operations do not discharge fecal coliform bacteria. As a result, bacteria monitoring requirements do not apply to this facility.

Parameter	Benchmark Values	Source of Value
Total Phosphorus	0.1 mg/L May 1-Sept 30 0.35 mg/L Oct 1- April 30	Lower Boise River TMDL 2015 Total Phosphorus Addendum

If you have any questions, please contact Margaret McCauley of my staff at (206) 553-1772.

Sincerely,



Michael J. Lidgard, Manager  
NPDES Permits Unit

cc: Lance Holloway, Idaho Department of Environmental Quality