



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

NOV 16 2015

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

Re: Additional Monitoring Requirements for the Jack B. Parson Dingle Facility under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053070

Dear Mr. Clark:

The purpose of this letter is to notify you of additional 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 Jack B. Parson Pocatello Facility at 1895 South Dingle Road in Montpelier, Idaho (Facility) discharges into the Bear River. The Bear River is listed as impaired for suspended sediment and total phosphorus. The State of Idaho Department of Environmental Quality (IDEQ) has established Total Maximum Daily Loads (TMDLs) for these. This letter summarizes the TMDL monitoring requirements.

Basis for EPA to Add Additional Requirements

The TMDL targets for the Bear River from the February 2013 Bear River Basin Addendum to the Bear River/Malad Subbasin Assessment and Total Maximum Daily Load Plan for HUCs 16010102, 16010201, 16010202, 16010204 are summarized in this table:

| Pollutant | Target |
|------------------------|---|
| Total Suspended Solids | 80 mg/L (March –July) 60 mg/L (August –February) |
| Total Phosphorus | 0.075 mg/L |

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 Total Phosphorus following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. This is in combination with the industrial sector monitoring (Sector E-Glass, Clay, Cement, Concrete, and Gypsum Products and Sector J-Mineral Mining and Dressing), which includes TSS monitoring.

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: Lynn Van Every, Idaho Department of Environmental Quality