



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 Edwards Facility under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053071

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 Edwards Facility at 2500 East 1800 South near Franklin, Idaho (Facility) discharges into Worm Creek, which 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, as discussed in more detail below. This letter summarizes TMDL related monitoring requirements.

Basis for EPA to Add Additional Requirements

The TMDL targets for Worm Creek from the March 2006 Final Bear River/Malad River Subbasin Assessment and Total Maximum Daily Load Plan for HUCs 16010102, 16010201, 16010202, 16010204 are summarized in this table:

Pollutant	Target
Total Suspended Solids	35 mg/L (low flow)
Total Phosphorus	0.05 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 and to conduct monitoring for TSS with this lower target level. This is in combination to the monitoring you are already conducting for your industry sector (J-Mineral Mining and Dressing).

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