



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

P4 Production, LLC
Attn: Branden Hendriks
1973 Government Dam Road, PO Box 948
Soda Springs, Idaho 83276

Re: Additional Monitoring Requirements for the P4 Production LLC Quartzite Quarry under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053141

Dear Mr. Hendriks:

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 P4 Production LLC Quartzite Quarry at 1973 Government Dam Road in Soda Springs, Idaho (Facility) discharges into Soda Creek. The State of Idaho Department of Environmental Quality (IDEQ) has established Total Maximum Daily Loads (TMDLs) for suspended sediment and total phosphorus that apply to Soda Creek.

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 Total Phosphorus and TSS following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1.

The TMDL targets for Soda 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	60 and 35 mg/L TSS for runoff and baseflow, respectively
Total Phosphorus	0.05 mg/L TP

Monitoring data and corrective action reports shall be submitted to EPA and IDEQ in accordance with Part 7 of the MSGP. Use EPA's electronic data system to submit to EPA. For IDEQ, please submit to the Pocatello Regional Office:

Lynn Van Every
DEQ Pocatello Regional Office
444 Hospital Way #300
Pocatello, ID 83201
(208) 236-6160
lynn.vanevery@deq.idaho.gov

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: Lynn Van Every, Idaho Department of Environmental Quality