



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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

OFFICE OF
WATER AND WATERSHEDS

MAY 17 2018

Reply to Attention of: OWW-191

Ms. Michelle S. McCurry
Director of Risk Management
Caldwell Industrial Airport
PO Box 1239
Fort Smith, AR 72902

Re: Additional Monitoring Requirements for Propak under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Tracking # IDR050264

Dear Ms. McCurry:

The purpose of this letter is to notify you of watershed based 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 Propak facility at 1517 Smeed Parkway in Caldwell, Idaho (Facility) discharges into Mason Creek, which is part of the Total Daily Maximum Loads (TMDLs) that the State of Idaho Department of Environmental Quality has established for the Lower Boise River watershed for total phosphorus, sediment, and bacteria as *Escherichia coli* (*E.coli*).

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, TSS, and *E.coli* following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1.

| Parameter | Target 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 |
| TSS | 20 mg/L | Lower Boise River TMDL, |

| Parameter | Target Values | Source of Value |
|------------------|----------------------|---|
| | | 2015 Sediment and Bacteria Addendum, Table 27 |
| <i>E.coli</i> | 126 cfu/100 mL | Lower Boise River TMDL, 2015 Sediment and Bacteria Addendum, Part 5.4.4 |

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

Sincerely,



Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Lance Holloway, Idaho Department of Environmental Quality