



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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

OFFICE OF
WATER AND
WATERSHEDS

NOV 19 2015

Reply to Attn of: OWW-191

The Amalgamated Sugar Co. LLC
Attn: Jorge DeVarona
P.O. Box 127
Twin Falls, Idaho 83303

Re: Additional Monitoring Requirements for The Amalgamated Sugar Co. LLC under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053119

Dear Mr. DeVarona:

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 Amalgamated Sugar CO. LLC facility at 2320 Orchard Drive East in Twin Falls, Idaho (Facility) discharges into Rock Creek. Rock Creek is listed as impaired for Escherichia coli (e.coli), flow regime alterations, phosphorus, sedimentation / siltation, and total suspended solids (TSS). In addition, the State of Idaho Department of Environmental Quality (IDEQ) has established TMDLs for Rock Creek, as discussed in more detail below.

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, TSS, and e.coli following the standard benchmark monitoring procedures outlined in the MSGP at Section 6.2.1.

Parameter	Benchmark Values	Source of Value
TSS	52 mg/L	2010 IDEQ Integrated Report and 2005 Upper Snake Rock TMDL

Parameter	Benchmark Values	Source of Value
TP	0.100 mg/L	2010 IDEQ Integrated Report and 2005 Upper Snake Rock TMDL
e. coli	126 colony forming units /100 mL (geometric mean) with a "trigger" value of 406 colony forming units /100 mL	2010 IDEQ Integrated Report and 2005 Upper Snake Rock TMDL

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: Dr. Balthasar Buhidar, Idaho Department of Environmental Quality