



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

WATER DIVISION

October 28, 2019

Reply to: Attn of 19-C04

Mike Basabe
Iron Horse Excavation, LLC
PO Box 1004
Payette, Idaho 83661

Re: Additional Monitoring Requirements for Bailey Pit under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR05J00L

Dear Mr. Basabe:

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 Stormwater Discharges Associated with Industrial Activity (MSGP). Based on the information provided in your Notice of Intent (NOI), if storm water from the Bailey Pit at 3510 East Rim Road in Elmore, Idaho (Facility) were to leave the site, it would discharge into the Snake River watershed. The State of Idaho Department of Environmental Quality (IDEQ) has established total maximum daily loads (TMDL) for temperature and phosphorus for the Snake River.

Specific Requirements

Pursuant to Parts 2.2.2.1 and 6.2.4.1 of the MSGP, if there are storm water discharges that leave the site, the Facility would be required to conduct storm water monitoring for temperature following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. If there are discharges in May through September, the Facility would be required to conduct storm water monitoring for total phosphorus, following the same procedures.

Parameter	Target Value	Source of Value
Temperature	22° C instantaneous	Idaho Water Quality Standard
Total phosphorus	0.07 mg/L May-September	Snake River - Hells Canyon TMDL

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).

If you have any questions, please contact Margaret McCauley via email mccauley.margaret@epa.gov or by telephone at (206) 553-1772.

Sincerely,

A handwritten signature in blue ink, appearing to read "Karen Bunge".

For Mathew Martinson, Manager
Permitting, Drinking Water, & Infrastructure Branch

cc: Lance Holloway, Idaho Department of Environmental Quality