



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

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

OCT 10 2017

OFFICE OF  
WATER AND WATERSHEDS

Reply to Attn of: OWW-191

Kiel J. Burmester  
Environmental System Coordinator  
Bannock County Public Works  
1500 North Fort Hall Mine Road  
Pocatello, ID 83204

Re: Additional Monitoring Requirements for the Bannock County Landfill under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053239

Dear Mr. Burmester:

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 Storm water Discharges Associated with Industrial Activity (MSGP). Based on the information provided in your Notice of Intent (NOI), storm water from the Bannock County landfill facility at 1500 N Fort Hall Mine Road in Pocatello, Idaho (Facility) discharges into the Portneuf River. The Portneuf River is listed as impaired for flow alteration, fecal coliform as measured by *Escherichia coli* (*E.coli*), oil and grease, total nitrogen, suspended sediment, and total phosphorus. The State of Idaho Department of Environmental Quality (IDEQ) has established Total Maximum Daily Loads (TMDLs) for most of these pollutants.

These requirements are the same as under the previous 2017 MSGP tracking number for the Bannock County Landfill, IDR050005.

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 *E.coli*, Oil & Grease, Total Phosphorus, and TSS following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1.

The TMDL targets for the Portneuf River from the February 2010 Portneuf River TMDL Revision and Addendum are summarized in this table:

Pollutant	Target
Total Suspended Solids	35 mg/L (low flow) 80 mg/L (high flow)
Total Phosphorus	0.07 mg/L (low flow) 0.125 mg/L (high flow)
<i>Escherichia coli</i>	126 organisms/100 mL
Oil and Grease	5 mg/L

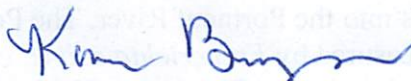
Where high flow months include March, April, May, and June.

In addition to reporting any monitoring data to EPA through the electronic monitoring system, also submit a copy of the results to IDEQ:

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

If you have any questions, please contact Margaret McCauley of my staff at [mccauley.margaret@epa.gov](mailto:mccauley.margaret@epa.gov) or (206) 553-1772.

Sincerely,



Karen Burgess, Acting Manager  
NPDES Permits Unit

cc: Lynn Van Every, Idaho Department of Environmental Quality