



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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

OFFICE OF
WATER AND
WATERSHEDS

Reply to Attn of: OWW-191

MAR 01 2016

Rodney Krogh
Clearwater Forest Industries
4689 Highway 13 South
Kooskia, ID 83539

Re: Additional Monitoring Requirements for Clearwater Forest Industries under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR05I305

Dear Mr. Krogh:

The purpose of this letter is to notify you of watershed specific monitoring that must be implemented at your facility to maintain permit coverage under the U.S. Environmental Protection Agency's 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 Clearwater Forest Industries facility on Highway 13 near Kooskia, Idaho (Facility) discharges into the south fork of the Clearwater River, which is listed as impaired for temperature, and sedimentation / siltation. The State of Idaho Department of Environmental Quality (IDEQ) has established TMDLs for total suspended solids (TSS) and temperature.

Basis for EPA to Add Additional Requirements

Under the MSGP, there are monitoring requirements associated with your industrial category (Sector: A-Timber Products) and for discharging to impaired waters. This letter summarizes the additional TMDL monitoring 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 if any additional limits or controls are necessary for your discharge to be consistent with the assumptions of any available waste load allocation in the TMDL, or if coverage under an individual permit is necessary in accordance with Part 1.2.3." See also Part 6.2.5 of the MSGP (allowing EPA to notify a facility of additional monitoring requirements).

To determine whether Clearwater Industries is contributing to the sediment impairment in the south fork Clearwater River, monitoring to compare to the Idaho Water Quality Standard is required. Because turbidity is typically easier to monitor, and a relationship between turbidity and TSS can be established, we are requiring turbidity monitoring; if you find that it would be preferable to do TSS, please let us know.

Turbidity is to be measured:

1. immediately upstream from the discharge point and outside any visible plume; and

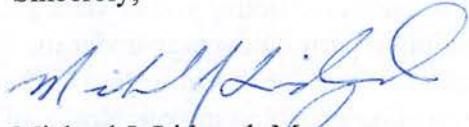
2. immediately downstream from the discharge point and within any visible plume. While this sampling is to be done in the framework of benchmark monitoring to determine whether the facility is contributing to the impairment, your results are to be compared to the Idaho Water Quality Standards for turbidity. Turbidity is allowed up to 50 NTUs above the background measurement instantaneously or up to 25 NTUs above background measurement for more than 10 days, where NTU is nephelometric turbidity unit. Any single sampling event that exceeds the 50 NTU standard, or any series of samples indicating an exceedance of the 25 NTU standard, constitutes a violation of the permit triggering the need for corrective actions.

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 TSS following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. This is in addition to the nationally set industrial sector sampling. There is no requirement to monitor for temperature at this time.

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

Sincerely,



Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Cynthia Barrett, Idaho Department of Environmental Quality