



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

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

OFFICE OF
WATER AND
WATERSHEDS

FEB 04 2016

Reply to Attn of: OWW-191

Clements Concrete Company
Attn: Samuel Bernard
730 N 1500 W
Orem, UT 84057

Re: Additional Monitoring Requirements for Clements Concrete under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053011

Dear Mr. Bernard:

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 Clements Concrete facility 10988 Joplin Road in Boise, Idaho (Facility) discharges into the Boise River. This stretch of the Boise River is listed as impaired for total phosphorus, temperature, fecal coliform bacteria as measured by *Escherichia coli* (*E. coli*), flow regime alterations, habitat alterations, and sedimentation/siltation. The State of Idaho Department of Environmental Quality (IDEQ) has established Total Daily Maximum Loads (TMDL) for TSS, total phosphorus, and *E. coli* for the Boise River.

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

Sediment: The Boise River TMDL target for sediment as TSS is no more than 50 mg/L for 60 days and no more than 80 mg/L for 14 days between April 1 and September 30. The industrial sector effluent limit for the Facility is 25 mg/L, lower than the Boise River target. Thus the facility is required to do quarterly monitoring following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1 but results are to be compared to the effluent limit of 25 mg/L.

Bacteria: For bacteria, the target is a 126 Geometric Mean or 406 Instantaneous Maximum colony forming units per 100 ml. However, the Lower Boise River TMDL identifies that normal sand and

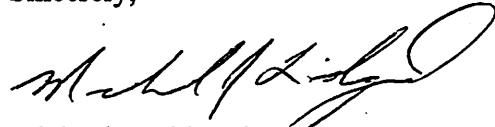
gravel operations do not discharge fecal coliform bacteria. As a result, bacteria monitoring requirements do not apply to this facility.

Phosphorus: The Greyhound Facility is listed in Table 9 of the Lower Boise River TMDL 2015 Total Phosphorus Addendum. The Facility is required to conduct storm water monitoring for total phosphorus following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1 with results compared to the TMDL targets.

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	25 mg/L	MSGP Part 8.J.8

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

Sincerely,



Michael J. Lidgard, Manager
NPDES Permits Unit

Attachment

cc: Lance Holloway, Idaho Department of Environmental Quality