



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

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

OFFICE OF
WATER AND WATERSHEDS

AUG - 9 2016

Reply to Attn of: OWW-191

Mr. Wade Allred
Environmental, Health and Safety Manager
Clif Bar Baking Company
3438 Eldridge Avenue
Twin Falls, Idaho 83301

Re: Additional Monitoring Requirements for Clif Bar Baking Company, Twin Falls under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053197

Dear Mr. Allred:

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 Clif Bar Baking Company facility at 3438 Eldridge Avenue in Twin Falls, Idaho (Facility) discharges into the Perrine Coulee System, which is part of the Upper Snake River – Rock Creek HUC (17040212). The State of Idaho Department of Environmental Quality (IDEQ) has established Total Maximum Daily Loads (TMDLs) for TSS, total phosphorus (TP), and e.coli for the Perrine Coulee System as part of the 2005 Upper Snake Rock TMDL Modification (Table 2-A, page 43).

Basis for EPA to Add Additional Requirements

Part 2.2.2.1 of the MSGP 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 and e.coli following the standard benchmark monitoring procedures outlined in the MSGP at Section 6.2.1. Please note that the TSS benchmark for the TMDL is lower than the standard MSGP benchmark value for the industrial category applicable to your Facility.

| Parameter | Benchmark Values | Source of Value |
|-----------|--------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|
| TSS | 52 mg/L | 2010 IDEQ Integrated Report and 2005 Upper Snake Rock TMDL |
| 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 or mccauley.margaret@epa.gov.

Sincerely,



Michael J. Lidgard
Manager
NPDES Permits Unit

cc: Dr. Balthasar Buhidar, Idaho Department of Environmental Quality