



**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).

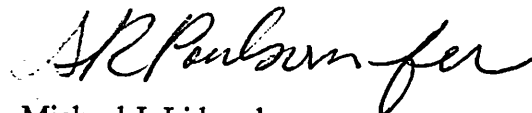
**Specific Requirements**

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](mailto:mccauley.margaret@epa.gov).

Sincerely,



Michael J. Lidgard  
Manager  
NPDES Permits Unit

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