UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
WATER AND WATERSHEDS

MAY - 3 2017

Reply to Attention of: OWW-191

Mark Elder
Clyde Companies
501 East 41st Street
Garden City, Idaho 83714

Re: Additional Monitoring Requirements for Notus Facility, Caldwell under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053231

Dear Mr. Elder

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 Stormwater Discharges Associated with Industrial Activity (MSGP). Based on the information provided in your Notice of Intent (NOI), storm water from the Notus Facility at Dixie River Road in Caldwell, Idaho (Facility) is part of the Lower Boise River watershed. The State of Idaho Department of Environmental Quality has established Total Daily Maximum Loads (TMDLs) for the Lower Boise River watershed for total phosphorus, sediment, and bacteria as *Escherichia coli* (*E.coli*).

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 total phosphorus, TSS, and *E.coli* following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. TSS results are to be compared to the Lower Boise specific TSS target values, which are lower than the industry benchmark.

Parameter	Benchmark 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	33 mg/L	Lower Boise River TMDL, 2015 Sediment and Bacteria Addendum, Table 27

Parameter	Benchmark Values	Source of Value
E.coli	126 cfu/100 mL	Lower Boise River TMDL, 2015 Sediment and Bacteria Addendum, Part 5.4.4

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

cc: Lance Holloway, Idaho Department of Environmental Quality