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

OFFICE OF
WATER AND ATERSHEDS

SEP 2 1 2016

Reply to Attn of: OWW-191

Mr. Terry Gosney
Watco Companies
315 West Third Street
Pittsburg, KS 66762

Re: Additional Monitoring Requirements for Eastern Idaho Railroad Twin Falls Depot under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053205

Dear Mr. Gosney:

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 Eastern Idaho Railroad Twin Falls Depot facility at 618 Shoshone Street West in Twin Falls, Idaho (Facility) discharges into Rock Creek, which is part of the Upper Snake River – Rock Creek watershed. The State of Idaho Department of Environmental Quality (IDEQ) has established Total Maximum Daily Loads (TMDLs) for TSS, total phosphorus (TP), and e.coli.

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.

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