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

OFFICE OF
WATER AND
WATERSHEDS

DEC 18 2015

Reply to Attn of: OWW-191

P4 Production, LLC
Attn: Branden Hendriks
1973 Government Dam Road, PO Box 948
Soda Springs, Idaho 83276

Re: Additional Monitoring Requirements for the Enoch Valley and South Rasmussen Mines under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053140

Dear Mr. Hendriks:

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 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 Enoch Valley and South Rasmussen Mines at 3168 Blackfoot River Road, in Soda Springs, Idaho (Facility) discharges into Rasmussen Creek, an unnamed Tributary of Sheep Creek, Angus Creek, and an unnamed wetland. The State of Idaho Department of Environmental Quality (IDEQ) has established Total Maximum Daily Loads (TMDLs) for suspended sediment for Rasmussen Creek, an unnamed Tributary of Sheep Creek, and Angus Creek.

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).

Part 6.2.4.1 of the MSGP, states "If you discharge to an impaired water, you must monitor for all pollutants for which the waterbody is impaired and for which a standard analytical method exists (see 40 CFR Part 136)."

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 TSS following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. Because turbidity is typically easier to monitor, and a relationship between turbidity and TSS can be established, we are requiring turbidity monitoring; if you find that it would be preferable to do TSS, please let us know.

Turbidity is to be measured:

1. immediately upstream from the discharge point and outside any visible plume; and
2. immediately downstream from the discharge point and within any visible plume.

While this sampling is to be done in the framework of benchmark monitoring to determine whether the facility is contributing to the impairment, your results are to be compared to the Idaho Water Quality Standards for turbidity. Turbidity is allowed up to 50 NTUs above the background measurement instantaneously or up to 25 NTUs above background measurement for more than 10 days. Any single sampling event that exceeds the 50 NTU standard, or any series of samples indicating an exceedance of the 25 NTU standard, constitutes a violation of the permit triggering the need for corrective actions.

Monitoring data and corrective action reports shall be submitted to EPA and IDEQ in accordance with Part 7 of the MSGP. Use EPA's electronic data system to submit to EPA. For IDEQ, please submit to the Pocatello Regional Office:

Lynn Van Every
DEQ Pocatello Regional Office
444 Hospital Way #300
Pocatello, ID 83201
(208) 236-6160
lynn.vanevery@deq.idaho.gov

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: Lynn Van Every, Idaho Department of Environmental Quality