



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 10**

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

OFFICE OF  
WATER AND  
WATERSHEDS

NOV 19 2015

Reply to Attn of: OWW-191

Benjamin Dunbar  
Glanbia Foods, Inc.  
121 4th Avenue South  
Twin Falls, Idaho 83301

Re: Additional Monitoring Requirements for Glanbia Foods, Inc under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR05C387

Dear Mr. Dunbar:

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 Glanbia Foods, Inc facility at 1728 South 2300 East in Gooding, Idaho (Facility) discharges into the Little Wood River, which is listed as impaired for sediment, total phosphorus, and temperature. The State of Idaho Department of Environmental Quality (IDEQ) has established a total maximum daily loads (TMDLs) for the Little Wood River.

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 TP and TSS following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1.

Parameter	Benchmark Values	Source of Value
TSS	50 mg/L	Little Wood River Subbasin Assessment and TMDL, August 2005, page 50
TP	0.100 mg/L	Little Wood River Subbasin Assessment and TMDL, August 2005, page 49

If you have any questions, please contact Margaret McCauley at (206) 553-1772.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Lidgard". The signature is fluid and cursive, with a large, stylized "L" and "G".

Michael J. Lidgard, Manager  
NPDES Permits Unit

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