



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 10**

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

OFFICE OF  
WATER AND  
WATERSHEDS

**JAN 26 2017**

Reply to Attn of: OWW-191

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

Re: Additional Monitoring Requirements for Glanbia Foods under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053120

Dear Mr. Dunbar:

The purpose of this letter is to notify you of watershed specific monitoring 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) should this facility ever discharge. Based on the information provided in your Notice of Intent (NOI), storm water from the United Parcel Service facility at 236 Washington Boulevard in Twin Falls, Idaho (Facility) is normally retained on site and might, in an extraordinarily large storm event, discharge into storm drains that lead to the Snake River, which is listed as impaired for fecal coliform bacteria as measured by *Escherichia coli* (*E. coli*), total phosphorus (TP), sedimentation / siltation, and total suspended solids (TSS). The State of Idaho Department of Environmental Quality (IDEQ) has established Total Daily Maximum Loads (TMDLs) for TP, TSS, and *E. coli* for the Snake River watershed.

**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, should there ever be a discharge, the Facility is required to conduct storm water monitoring for TP, TSS, and *E. coli* following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. This would be in addition to the nationally set industrial sector sampling.

Parameter	Benchmark Values	Source of Value
TSS	52 mg/L	Upper Snake/Rock Subbasin TMDL (July 2000)

Parameter	Benchmark Values	Source of Value
TP	0.100 mg/L	Upper Snake/Rock Subbasin TMDL (July 2000) and 2005 Upper Snake Rock TMDL Modification Report
E. coli	126 colony forming units /100 mL (geometric mean) with a "trigger" value of 406 colony forming units /100 mL	Upper Snake/Rock Subbasin TMDL (July 2000) and 2005 Upper Snake Rock TMDL Modification Report

If you have any questions, please contact Margaret McCauley at [mccauley.margaret@epa.gov](mailto:mccauley.margaret@epa.gov) (206) 553-1772.

Sincerely,



Michael J. Lidgard, Manager  
NPDES Permits Unit

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