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

OFFICE OF
WATER AND
WATERSHEDS

Reply to Attention of: OWW-191

NOV 16 2015

Staker Parson Companies
Attn: Patrick Clark
2350 S 1900 W Suite 100
Ogden, Utah 84401

Re: Additional Monitoring Requirements for Idaho Concrete, Caldwell under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053064

Dear Mr. Clark:

The purpose of this letter is to notify you of additional 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 Idaho Concrete facility at 21943 Look Lane in Caldwell, Idaho (Facility) discharges into the lower Boise River. The lower Boise River is listed as impaired for fecal coliform bacteria as measured by *Escherichia coli* (*E.coli*), total phosphorus, flow regime alterations, habitat alterations, temperature, and total suspended solids (TSS). In addition, the State of Idaho Department of Environmental Quality (IDEQ) has established TMDLs for the lower Boise River. This letter summarizes TMDL related monitoring requirements.

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).

Parameter	Target	Source
TSS	30 mg/L monthly and 45 mg/L weekly maximum averages	1999 Lower Boise River TMDL. 2008 Lower Boise River Sediment and Bacteria Amendment
TP	0.1 mg/L May 1-Sept 30 0.35 mg/L Oct 1- April 30	2015 Lower Boise River TMDL, Total Phosphorus Addendum
E. coli	126 Geometric Mean, 406 Instantaneous Maximum colony forming units	2010 IDEQ Integrated Report, 2008 Lower Boise TMDL Addendum, and 1999 Lower Boise River TMDL.

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 *E.coli* and TP following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. This is in addition to the Nitrate plus Nitrite storm water sampling required for operators of Subsector J1. Sand and Gravel Mining (SIC 1442, 1446). TSS results are to be compared to the Lower Boise specific TSS target values, which are lower than the industry benchmark.

If you have any questions, please contact Margaret McCauley of my staff at (206) 553–1772.

Sincerely,

Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Lance Holloway, Idaho Department of Environmental Quality