



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

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

OFFICE OF
WATER AND
WATERSHEDS

FEB 26 2016

Reply to Attn of: OWW-191

FMC Corporation
Attn: James Williams
1735 Market Street
Philadelphia, Pennsylvania 19103

Re: Additional Monitoring Requirements for the FMC Production Site under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053014

Dear Mr. Williams:

The purpose of this letter is to notify you of watershed based 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 FMC Production site at 2275 Dry Valley Road in Soda Springs, Idaho (Facility) discharges into Dry Valley Creek and Chicken Creek. The State of Idaho Department of Environmental Quality (IDEQ) has established a Total Maximum Daily Load (TMDL) for suspended sediment for Dry Valley Creek and for Chicken Creek. As part of the effort to gain information regarding elevated selenium concentrations in certain watersheds in south east Idaho, selenium storm water monitoring is being required of your facility.

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 if any additional limits or controls are necessary for your discharge to be consistent with the assumptions of any available waste load allocation in the TMDL, or if coverage under an individual permit is necessary in accordance with 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 Sections 2.2.2.1 and 6.2.4.1 of the MSGP, the Facility is required to conduct storm water monitoring for TSS and selenium following the standard benchmark monitoring procedures outlined in the MSGP at Section 6.2.1.

The TMDL target for sediment in Chicken and Dry Valley Creeks, from the December 2001 Blackfoot River TMDL Waterbody Assessment and Total Maximum Daily Load and the 2013 Revision of that TMDL is summarized in this table:

Parameter	Benchmark Values	Source of Value
TSS	14 day average not to exceed 4.6 NTU Daily maximum not to exceed 20.15 NTU	December 2001 Blackfoot River TMDL Waterbody Assessment and Total Maximum Daily Load (Table 1-1 p. 4)
Selenium	0.02 mg/L	Part 9.10.3.6 of the permit

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