



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

J.R. Simplot Company
Attn: Monty Johnson
1130 West Highway 30
Pocatello, Idaho 83204

Re: Selenium Monitoring Requirements for the Lanes Creek Phosphate Mine under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053044

Dear Mr. Johnson:

As part of the effort to gain information regarding elevated selenium concentrations in certain watersheds in south east Idaho, additional storm water monitoring is being required of your facility to maintain permit coverage under the U.S. Environmental Protection Agency's 2015 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP), should the facility become active during the permit term.

Based on the information provided in your Notice of Intent (NOI), storm water from the Lanes Creek Phosphate Mine (Facility) discharges into Lanes Creek.

Basis for EPA to Add Additional Requirements

See 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 the facility become active during the permit term the Facility is required to conduct storm water monitoring for selenium following the standard quarterly monitoring procedures outlined in the MSGP at Part 6.2. As per Part 9.10.3.6 of the permit, the benchmark level for selenium is 0.02 mg/L.

Climate conditions in south east Idaho may make Parts 6.1.6 and 6.2.1.2 relevant to your sampling plans.

"6.1.6 Climates with Irregular Stormwater Runoff.

If your facility is located in areas where limited rainfall occurs during parts of the year (e.g., arid or semi-arid climates) or in areas where freezing conditions exist that prevent runoff from occurring for extended periods, required monitoring events may be distributed during seasons when precipitation occurs, or when snowmelt results in a measurable discharge from your site. You must still collect the required number of samples. As specified in Part 7.4, you must also use NetDMR to report using a "no data" or "NODI" code for any of the regular reporting periods that there was no monitoring."

“6.2.1.2 Benchmark Monitoring Schedule. ...

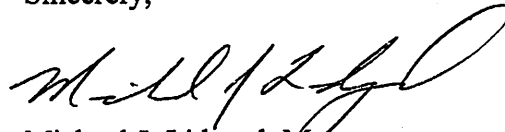
Facilities in climates with irregular stormwater runoff, as described in Part 6.1.6, may modify this quarterly schedule provided that this revised schedule is reported directly to EPA by the due date of the first benchmark sample.”

Should the mine become active and monitoring commence, 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,

A handwritten signature in black ink, appearing to read "Michael J. Lidgard", written over a horizontal line.

Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Lynn Van Every, Idaho Department of Environmental Quality