



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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

OFFICE OF
WATER AND
WATERSHEDS

Reply to Attn of: OWW-191

OCT 26 2017

Mike Etcheverry
Westway Feed Products LLC
121 East Tyler Street
Kimberly, Idaho 83341

Re: Additional Monitoring Requirements for Westway Feed Products LLC - Kimberly Plant, NPDES under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053244

Dear Mr. Etcheverry:

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). Based on the information provided in your Notice of Intent (NOI), storm water from the Westway Feed Products facility at 121 East Tyler Street in Kimberly, Idaho (Facility) is within the Snake River watershed, which is listed as impaired for total phosphorus (TP), flow alterations, fecal coliform bacteria as measured by *Escherichia coli* (*e.coli*), and total suspended solids (TSS). The State of Idaho Department of Environmental Quality (IDEQ) has established Total Daily Maximum Loads (TMDLs) for *e.coli*, TP, and TSS, 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 be a discharge, the Facility is required to conduct storm water monitoring for *e.coli*, TP, and TSS following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. This TSS monitoring will also fulfil the nationally set industrial sector (U1, Grain Mill Products) sampling, although the watershed specific target value is lower.

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	2010 IDEQ Integrated Report and 2005 Upper Snake Rock TMDL

The Storm Water Pollution Prevention plan submitted with the NOI indicated that there may be three points of discharge (outfalls) from the facility, while the NOI lists one. Part 6.1.1 *Monitored Outfalls* states,

“Applicable monitoring requirements apply to each outfall authorized by this permit, except as otherwise exempt from monitoring as a “substantially identical outfall.” If your facility has two or more outfalls that you believe discharge substantially identical effluents, based on the similarities of the general industrial activities and control measures, exposed materials that may significantly contribute pollutants to stormwater, and runoff coefficients of their drainage areas, you may monitor the effluent of just one of the outfalls and report that the results also apply to the substantially identical outfall(s). As required in Part 5.2.5.3, your SWPPP must identify each outfall authorized by this permit and describe the rationale for any substantially identical outfall determinations.”

So some adjustment to either the SWPPP, the NOI, or both seems indicated, for consistency.

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

Sincerely,



Karen Burgess, Acting Manager
NPDES Permits Unit

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