



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

NOV 16 2015

Staker Parson Companies  
Attn: Patrick Clark  
P.O. Box 3429  
Ogden, Utah 84409

Re: Additional Monitoring Requirements for IMC Cottonwood under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053078

Dear Mr. Clark:

The purpose of this letter is to notify you of watershed specific monitoring requirements 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), if there were a discharge of storm water from the IMC Cottonwood facility at 475 E 1535 N in Shoshone, Idaho (Facility) it would go into segment four of the Big Wood River watershed, which is listed as impaired for sediment, nutrients, and temperature. The State of Idaho Department of Environmental Quality (IDEQ) has established total maximum daily loads (TMDLs) for TSS and TP for the Little Wood River. This letter summarizes the TMDL 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.

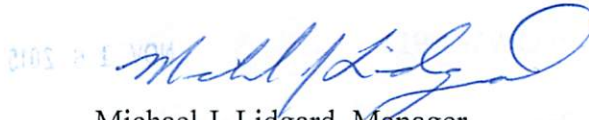
Specific Requirements

Pursuant to Parts 2.2.2.1 and 6.2.4.1 of the MSGP, if the Facility has a discharge, it is required to conduct monitoring for TP and TSS following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1 and using the Little Wood River TMDL targets as the benchmark values.

Parameter	Benchmark Values	Source of Value
TSS	50 mg/L	Little Wood River Subbasin Assessment and TMDL, August 2005, page 50
TP	0.100 mg/L	Little Wood River Subbasin Assessment and TMDL, August 2005, page 49

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael J. Lidgard". To the left of the signature, there is a faint blue stamp that reads "2005 JUN 1 10:04".

Michael J. Lidgard, Manager  
NPDES Permits Unit

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