



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
WATER AND
WATERSHEDS

NOV 19 2015

Reply to Attn of: OWW-191

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

Re: Additional Monitoring Requirements for IMC, Eagle under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053076

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 (EPA) 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 IMC facility at 2755 East State Street in Eagle, Idaho (Facility) discharges into the lower Boise River. The lower Boise River is listed as impaired for fecal coliform bacteria, total phosphorus (TP), flow regime alterations, habitat alterations, temperature, and total suspended solids (TSS). The State of Idaho Department of Environmental Quality (IDEQ) has established Total Maximum Daily Loads (TMDLs) for several of these impairments 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).

Specific Requirements

Sediment: Lower Boise River TMDLs have been set for sediment and bacteria. The TMDL target for sediment as TSS is no more than 50 mg/L for 60 days and no more than 80 mg/L for 14 days between April 1 and September 30. These values are higher than the 25 mg/L effluent limit for the Facility's industrial category, therefore should the facility discharge, the TSS data shall be compared to the effluent limit.

Bacteria: For bacteria, the target is a 126 Geometric Mean or 406 Instantaneous Maximum colony forming units per 100 ml. However, the Lower Boise River TMDL identifies that normal sand and

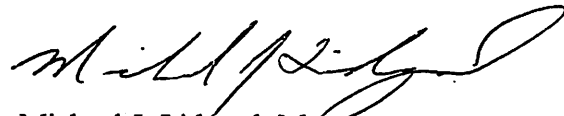
gravel operations do not discharge fecal coliform bacteria. As a result, bacteria monitoring requirements do not apply to this facility.

Total Phosphorus (TP): Pursuant to Sections 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 TP following the standard benchmark monitoring procedures outlined in the MSGP at Section 6.2.1. This is in addition to the requirements related to your industrial categories.

Parameter	Target	Source
TSS	25 mg/L	Effluent Limit
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

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