



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

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

OFFICE OF  
WATER AND  
WATERSHEDS

FEB 04 2018

Reply to Attention of: OWW-191

Staker Parson Companies  
Attn: Patrick Clark  
2350 S 1900 W Suite 100  
Ogden, Utah 84401

Re: Additional Monitoring Requirements for Idaho Concrete, Caldwell under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053064

Dear Mr. Clark:

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 Idaho Concrete facility at 21943 Look Lane in Caldwell, Idaho (Facility) discharges into the lower Boise River. The lower Boise River is listed as impaired for fecal coliform bacteria as measured by *Escherichia coli* (*E. coli*), total phosphorus, flow regime alterations, habitat alterations, temperature, and total suspended solids (TSS). In addition, the State of Idaho Department of Environmental Quality (IDEQ) has established TMDLs for the lower Boise River.

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, the Facility is required to conduct storm water monitoring for total phosphorus and TSS following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. The IMC Look Lane Facility is listed in Table 9 of the Lower Boise River TMDL 2015 Total Phosphorus Addendum.

As the TMDL targets<sup>1</sup> for sediment as TSS are above the effluent limit for this industrial category, the quarterly results are to be compared to the 25 mg/L effluent limit.

<sup>1</sup> 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.

**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.

Parameter	Target	Source
TSS	25 mg/L	Part 8.J.8 of the MSGP
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

This is in addition to the Nitrate plus Nitrite storm water sampling required for operators of Subsector J1. Sand and Gravel Mining (SIC 1442, 1446).

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

Sincerely,



Michael J. Lidgard, Manager  
NPDES Permits Unit

cc: Lance Holloway, Idaho Department of Environmental Quality