



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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

OFFICE OF  
WATER AND  
WATERSHEDS

DEC 09 2015

Reply to Attn of: OWW-191

Patrick Clark  
Staker Parson Companies  
2350 S 1900 W Suite 100  
Ogden UT 84401

Re: TMDL Monitoring Requirements for IMC Stutzman under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053052

Dear Mr. Clark:

The purpose of this letter is to convey to you the 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), should this facility discharge.

Based on the information provided in the Notice of Intent (NOI), storm water from IMC Stutzman at E 2900 N N 3450 E in Kimberly, Idaho (Facility) discharges into McMullen Creek. McMullen Creek is listed as impaired for fecal coliform bacteria as measured by *Escherichia coli* (e.coli), flow regime alterations, phosphorus, temperature, and total suspended solids (TSS). The State of Idaho Department of Environmental Quality (IDEQ) has established TMDLs for e.coli, phosphorus, and TSS for McMullen Creek.

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 the EPA to notify a facility of additional monitoring requirements).

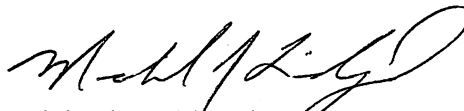
Specific Requirements

Pursuant to Parts 2.2.2.1 and 6.2.4.1 of the MSGP, should the Facility discharge, the Facility is required to conduct storm water monitoring for TP, TSS, and *e. coli* following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1.

Parameter	Benchmark Values	Source of Value
TSS	52 mg/L	2010 IDEQ Integrated Report and 2005 Upper Snake Rock TMDL
TP	0.100 mg/L	2010 IDEQ Integrated Report and 2005 Upper Snake Rock TMDL
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

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: Dr. Balthasar Buhidar, Idaho Department of Environmental Quality