



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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

OFFICE OF
WATER AND
WATERSHEDS

Reply to Attention of: OWW-191

APR 19 2016

Rodney Krogh
IdaPine Mill, LLC
240 West Taylor Avenue
Meridian ID 83642

Re: Additional Monitoring Requirements for IdaPine Mill, LLC, Meridian under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053187

Dear Mr. Krogh:

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 IdaPine Mill facility at 240 West Taylor Avenue in Meridian, Idaho (Facility) discharges through the Ada County Highway District municipal separate storm sewer system (MS4) into the Lower Boise River. The State of Idaho Department of Environmental Quality has established Total Daily Maximum Loads (TMDLs) for the Lower Boise River watershed for total phosphorus, sediment, and bacteria as *Escherichia coli* (*E.coli*).

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, TSS, and *E.coli* following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1.

Parameter	Target Values	Source of Value
Total Phosphorus	0.1 mg/L May 1-Sept 30 0.35 mg/L Oct 1- April 30	Lower Boise River TMDL 2015 Total Phosphorus Addendum

Parameter	Target Values	Source of Value
TSS	20 mg/L	Lower Boise River TMDL, 2015 Sediment and Bacteria Addendum, Table 27
<i>E.coli</i>	126 cfu/100 mL	Lower Boise River TMDL, 2015 Sediment and Bacteria Addendum, Part 5.4.4

In addition to following the standard electronic reporting as described in the permit, submit a copy of monitoring results to ACHD at the following address:

Stormwater Quality Supervisor
 Ada County Highway District
 3775 Adams Street
 Garden City, Idaho 83714

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

Sincerely,



Michael J. Lidgard, Manager
 NPDES Permits Unit

cc: Lance Holloway, Idaho Department of Environmental Quality
 Erica Anderson Maguire, Ada County Highway District