



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3188

JUN - 4 2019

WATER DIVISION

Attn of: 19-C04

Technical Sergeant Lonnie L. Kemp
Environmental Protection Specialist
Idaho Air National Guard
4447 South Byrd Street, Building 412
Boise, Idaho 83705-8103

Re: Monitoring Requirements for Idaho Air National Guard under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR50006

Dear Technical Sergeant Kemp:

The U.S. Environmental Protection Agency (EPA) appreciates the work that your team is doing to comply with the 2015 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP). As you know, the Idaho Air National Guard is one of a number of contributors to the Boise Airport stormwater collection system. The Airport environmental staff have informed EPA that that system had not discharged to Five Mile Creek since 2007, but due to unusual conditions it has discharged five times already in 2019.

We do encourage coordination among the different entities sharing the storm water collection system at the Boise Airport. Part 8.S.3 of the permit, Multiple Operators at Air Transportation Facilities, describes some of the expected coordination. It may be that working together would result in less work for each permittee.

EPA has spoken with the Idaho Department of Environmental Quality regarding how the discharges from the Air National Guard facility fits into the larger Boise Airport system, the Five Mile Creek watershed, and ultimately the Lower Boise watershed. Given that some of the discharge values have been above the Lower Boise River TMDL targets we are requiring continued quarterly monitoring until the average of 4 consecutive samples is below the target.

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

Parameter	Benchmark 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
<i>E.coli</i>	126 cfu/100 mL	Lower Boise River TMDL, 2015 Sediment and Bacteria Addendum, Part 5.4.4

Status of Benchmarks and TMDL Targets

EPA and IDEQ consider the TMDL target values equivalent to the MSGP benchmarks in their role in permit implementation. As Part 6.2.1 of the MSGP states, "The benchmark concentrations are not effluent limitations; a benchmark exceedance, therefore, is not a permit violation. However, if corrective action is required as a result of a benchmark exceedance, failure to conduct required corrective action is a permit violation."

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lidgard". The signature is fluid and cursive, with the first name "Michael" written in a larger, more prominent script than the last name "Lidgard".

Michael Lidgard, Manager
Permitting, Drinking Water, & Infrastructure Branch

cc: Lance Holloway, Idaho Department of Environmental Quality