



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3123

WATER
DIVISION

Reply to Attn of: OWW-191

APR 23 2019

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

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

Technical Sergeant Kemp:

The U.S. Environmental Protection Agency (EPA) received documentation from Captain Caye regarding the low likelihood of the Idaho Air National Guard facility at 4447 South Byrd Street in Boise, Idaho (Facility) contributing phosphorus or fecal coliform bacteria as measured by *Escherichia coli* (*E.coli*) into Five Mile Creek.

EPA discussed the Seneca Foods documentation with the Idaho Department of Environmental Quality (IDEQ) watershed manager. The consensus was to significantly reduce the amount of monitoring, but that some data are still needed to help IDEQ as they endeavor to further characterize the phosphorus and bacteria loadings in Lower Boise River watershed.

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* once a year for the first two years of coverage under the 2015 Multi Sector General Permit for industrial storm water. If both samples are below the target value, then no further *E.coli* monitoring is required for the 2015 permit term. If one or both samples are above the target value, discussion with IDEQ and EPA on next steps will be needed.

Parameter	Target	Reference
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 mccauley.margaret@epa.gov or (206) 553-1772.

Sincerely,

Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Lance Holloway, Idaho Department of Environmental Qu