



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue, Suite 155  
Seattle, WA 98101-3288

WATER DIVISION

JUN - 4 2019

Reply to  
Attn of: 19-C04

Mr. Kyle E. Carpenter  
Environmental Program Manager  
Idaho Army National Guard  
4715 South Byrd Street  
Boise, Idaho 83705

Re: Additional Monitoring Requirements for the Idaho Army National Guard under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR05J00I

Dear Mr. Carpenter:

The purpose of this letter is to notify you of monitoring requirement 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 Army National Guard at 4040 West Guard Street in Boise, Idaho (Facility) discharges into Five Mile Creek, Eightmile, and Ninemile Creeks which are part of the Lower Boise River watershed. The State of Idaho Department of Environmental Quality established Total Daily Maximum Loads (TMDLs) for the Lower Boise River watershed for total phosphorus, sediment, and bacteria as *Escherichia coli* (E.coli).

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	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
TSS	33 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

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).

Coordination for Permittees at the Airport

As you know, the Idaho Army National Guard is one of a number of permittees in the Boise Airport area. EPA encourages cooperation among the different entities 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.

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

Sincerely,



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

cc: Lance Holloway, Idaho Department of Environmental Quality