



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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

OFFICE OF  
WATER AND  
WATERSHEDS

Reply to Attn of: OWW-191

**DEC 05 2017**

Jesse Short  
Idaho Forest Group  
171 Highway 95 North  
Grangeville, ID 83530

**Re: Additional Monitoring Requirements for Idaho Forest Group Grangeville under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053246**

Dear Mr. Short:

The purpose of this letter is to notify you of watershed specific 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 Storm water Discharges Associated with Industrial Activity (MSGP). Based on the information provided in your Notice of Intent (NOI), storm water from the Idaho Forest Group facility at 171 Highway 95 North in Grangeville, Idaho (Facility) discharges into Long Haul Creek. The State of Idaho Department of Environmental Quality established Total Daily Maximum Loads (TMDLs) for the Cottonwood Creek watershed for total phosphorus, total inorganic nitrogen, temperature, sediment, and bacteria as *Escherichia coli*, which includes Long Haul Creek.

**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 total inorganic nitrogen following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. The watershed specific target for TSS is lower than the industry sector benchmark in the permit. Monitoring for bacteria and temperature is not required at this time.

Parameter	Benchmark Values	Source of Value
Total Phosphorus	0.1 mg/L	Cottonwood Creek TMDL, 2000
Total Suspended Solids	50 mg/l	Cottonwood Creek TMDL, 2000
Total Inorganic Nitrogen	0.3 mg/L	Cottonwood Creek TMDL, 2000

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).

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,

A handwritten signature in black ink, appearing to read "Karen Burgess", written in a cursive style.

Karen Burgess, Acting Manager  
NPDES Permits Unit

cc: Sujata Connell, Idaho Department of Environmental Quality