



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

NOV 16 2015

Staker Parson Companies
ATTN: Patrick Clark
P.O. Box 3429
Ogden, Utah 84409

Re: Additional Monitoring Requirements for the Jack B. Parson Pocatello Facility under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053060

Dear Mr. Clark:

The purpose of this letter is to notify you of additional 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 Jack B. Parson Pocatello Facility at 10200 Batiste Road in Pocatello, Idaho (Facility) discharges into the Portneuf River. The Portneuf River is listed as impaired for flow alteration, fecal coliform as measured by *Escherichia coli* (*E.coli*), oil and grease, suspended sediment, and total phosphorus. The State of Idaho Department of Environmental Quality (IDEQ) has established Total Maximum Daily Loads (TMDLs) for these.

I am aware that a letter was automatically sent to you that indicated that the monitoring requirements associated with your industrial categories (Sector: E-Glass, Clay, Cement, Concrete, and Gypsum Products, J-Mineral Mining and Dressing, and Sector: D-Asphalt Paving and Roofing Materials and Lubricants) under the MSGP. Due to a system oversight, the additional monitoring requirements for discharging to an impaired water with TMDLs were not included in that letter. This letter summarizes the additional monitoring requirements that should have been included in the original MSGP monitoring requirements letter.

Basis for EPA to Add Additional Requirements

The TMDL targets for the Portneuf River from the February 2010 Portneuf River TMDL Revision and Addendum are summarized in this table:

Pollutant	Target
Total Suspended Solids	35 mg/L (low flow) 80 mg/L (high flow)
Total Phosphorus	0.07 mg/L (low flow) 0.125 mg/L (high flow)
<i>Escherichia coli</i>	126 organisms/100 mL
Oil and Grease	5 mg/L

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 *E.coli*, Oil & Grease, and Total Phosphorus following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. This is in combination with the industry sector monitoring (Sector: E-Glass, Clay, Cement, Concrete, and Gypsum Products, J-Mineral Mining and Dressing, and Sector: D-Asphalt Paving and Roofing Materials and Lubricants).

If you have any questions, please contact Margaret McCauley of my staff at (206) 553-1772.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael J. Lidgard", is written over a faint, circular official stamp.

Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Lynn Van Every, Idaho Department of Environmental Quality