UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
WATER AND
WATERSHEDS

DEC 18 2015

Reply to Attn of: OWW-191

McFarland Cascade Pole Lumber Company
Attn: Edward Smith
P.O. Box 1496
Tacoma, Washington 98401

Re: Additional Monitoring Requirements for the MCPLC Sandpoint Facility under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053032

Dear Mr. Smith:

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 MCPLC Sandpoint Facility at 977 Baldy Mountain Road in Sandpoint, Idaho (Facility) discharges through the storm sewer system to Sand Creek-Schweitzer Creek, and that in the summer the segment of Sand Creek functions as a backwater part of Lake Pend Oreille. The State of Idaho Department of Environmental Quality (IDEQ) has established Total Maximum Daily Loads (TMDLs) for Sand Creek for temperature and sediment, and a TMDL for total phosphorus for Lake Pend Oreille.

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).

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 turbidity and total phosphorus for discharges to Sand Creek following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. Phosphorus monitoring is only required of discharges between June 1 and September 30.

Parameter	Benchmark Values	Source of Value
Total phosphorus	9 ug/L	Pend Oreille Lake, Nearshore Nutrient TMDL Implementation Plan A Nutrient Management Plan For Pend Oreille Lake Bonner County, Idaho, December 2004

Because turbidity is typically easier to monitor, and a relationship between turbidity and TSS can be established, we are requiring turbidity monitoring; if you find that it would be preferable to do TSS, please let us know.

Turbidity is to be measured:

1. immediately upstream from the discharge point and outside any visible plume; and
2. immediately downstream from the discharge point and within any visible plume.

While this sampling is to be done in the framework of benchmark monitoring to determine whether the facility is contributing to the impairment, your results are to be compared to the Idaho Water Quality Standards for turbidity. Turbidity is allowed up to 50 NTUs above the background measurement instantaneously or up to 25 NTUs above background measurement for more than 10 days. Any single sampling event that exceeds the 50 NTU standard, or any series of samples indicating an exceedance of the 25 NTU standard, constitutes a violation of the permit triggering the need for corrective actions.

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: June Bergquist, Idaho Department of Environmental Quality