



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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

OFFICE OF
WATER AND WATERSHEDS

NOV 7 2017

Reply to Attn of: OWW-191

Mr. Branden S. Hendriks
P4 Production, LLC
3268 Blackfoot River Road
PO Box 816
Soda Springs, ID 83276

Re: Watershed Specific Monitoring Requirements for the Trail Creek Exploration Drilling under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference Number IDR053245

Dear Mr. Hendriks:

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 2015 Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activity (MSGP). Based on the information provided in your Notice of Intent for permit coverage, storm water from the Trail Creek Exploration Drilling near Soda Springs, Idaho (Facility) discharges into Slug Creek. The State of Idaho Department of Environmental Quality (IDEQ) has established a Total Maximum Daily Loads (TMDLs) for sediment for Slug Creek.

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, if there are discharges from industrial activity, the Facility is required to conduct storm water monitoring for TSS following the standard monitoring procedures outlined in the MSGP at Part 6.2. 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, immediately upstream from the discharge point and outside any visible plume; and immediately downstream from the discharge point and within any visible plume.

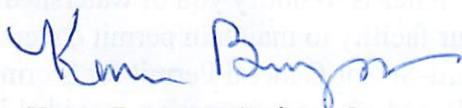
While this sampling is to be done in the framework of benchmark monitoring to determine whether the facility is contributing to the impairment, your results are to be compared to the Idaho Water Quality Standards for turbidity. Turbidity shall not exceed background turbidity by more than fifty (50) NTU instantaneously or more than twenty-five (25) NTU for more than ten (10) consecutive 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.

Should monitoring commence, in addition to submitting data through EPA's electronic system, copies of the monitoring reports shall be sent to:

Lynn Van Every
IDEQ Pocatello Regional Office
444 Hospital Way #300
Pocatello, ID 83201
(208) 236-6160
lynn.vanevery@deq.idaho.gov

If you have any questions, please contact Margaret McCauley of my staff at (206) 553-1772 or mccauley.margaret@epa.gov.

Sincerely,



Karen Burgess, Acting Manager
NPDES Permits Unit

cc: Lynn Van Every, Idaho Department of Environmental Quality