



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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

OFFICE OF
WATER AND
WATERSHEDS

NOV 19 2015

Reply to Attn of: OWW-191

Kirby Farner
Pacific Steel and Recycling
1401 3rd Street North West
Great Falls, MT 59404

Re: Additional Monitoring Requirements for Pacific Steel and Recycling – Burley under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053098

Dear Mr. Farner:

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 (NOI), storm water from the Simplot Transportation facility at 320 West Main in Burley, Idaho (Facility) discharges into the Snake River via the municipal storm drain system. This stretch of the Snake is listed as impaired for total phosphorus (TP) and The State of Idaho Department of Environmental Quality (IDEQ) has established a TMDL for TP.

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 TP following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1.

Parameter	Benchmark Values	Source of Value
TP	0.100 mg/L	Upper Snake/Rock Subbasin TMDL (July 2000) and 2005 Upper Snake Rock TMDL Modification Report

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Lidgard". The signature is fluid and cursive, with a large, stylized "M" and "L".

Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Dr. Balthasar Buhidar, Idaho Department of Environmental Quality