



**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-130

Power County Highway District  
Attn: James McLean  
3090 Lamb Weston Road  
American Falls, ID 83211

Re: Additional Monitoring Requirements for Power County Highway Material Source under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053007

Dear Mr. McLean:

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) 2014 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 Power County Highway Material Source facility at Richards Road MP 0.6 in Rockland, Idaho (Facility) discharges into the south fork of Rock Creek. The south fork of Rock Creek is listed as impaired for sediment and the State of Idaho Department of Environmental Quality (IDEQ) has established a Total Maximum Daily Load (TMDL), as discussed in more detail below.

I am aware that a letter was automatically sent to you that indicated the monitoring requirements (Nitrate plus Nitrite Nitrogen and Total Suspended Solids (TSS)) associated with your industrial category (Sector: J- Mineral Mining and Dressing) 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 south fork of Rock Creek from the Rock Creek from The Lake Walcott Subbasin Assessment, Total Maximum Daily Load, and Implementation Plan are summarized in this table:

Pollutant	Target
Sediment	50 mg/L monthly avg, 80 mg/L daily max

Section 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,

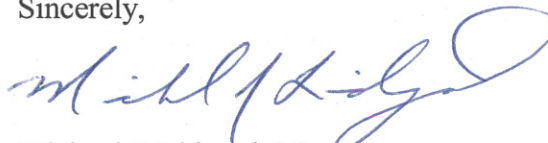
or if coverage under an individual permit is necessary per Part 1.2.3.” See also Section 6.2.5 of the MSGP (allowing EPA to notify a facility of additional monitoring requirements).

#### Specific Requirements

Pursuant to Sections 2.2.2.1 and 6.2.4.1 of the MSGP, the Facility is required to conduct storm water monitoring for sediment following the standard benchmark monitoring procedures outlined in the MSGP at Section 6.2.1, but using the lower target level from the TMDL as the determinant for corrective action rather than the industrial sector benchmark of 100 mg/L. See Attachment A for the specific monitoring requirements for the Facility.

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", with a large, stylized loop at the end.

Michael J. Lidgard, Manager  
NPDES Permits Unit

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

## APPENDIX A: ADDITIONAL MONITORING REQUIREMENTS

Parameter	Benchmark Values	Source of Value
Sediment	50 mg/L monthly avg, 80 mg/L daily max	The Lake Walcott Subbasin <u>Assessment</u> , Total Maximum Daily Load, and Implementation Plan [page 129]

Monitoring Locations: All outfalls. The facility may use the “substantially identical” provisions of the MSGP, if they apply (such as Parts 3.2.3 and 6.1.1).

Monitoring Schedule: Follow the schedule outlined in the MSGP in Part 6.2.1 Benchmark Monitoring Schedule

Samples must be taken for a measurable storm event that follows a preceding storm event by at least a 24-hour dry period. Samples must be collected within the first 30 minutes of a measurable storm event. If it is not possible to collect the sample within the first 30 minutes of a measurable storm event, the sample must be collected as soon as practicable after the first 30 minutes and documentation must be kept with the storm water pollution prevention plan (SWPPP) explaining why it was not possible to take samples within the first 30 minutes of a measurable storm event.

Sample Type: Grab

Benchmark value comparison: Monthly samples shall be averaged by the actual number of qualifying samples taken to determine a quarterly value. The quarterly value shall be used to determine if the benchmark value is met or exceeded.

Data not exceeding benchmark value: If four consecutive quarterly values do not exceed the benchmark value, this monitoring requirement is fulfilled.

Data exceeding benchmark value: If a quarterly value exceeds the benchmark value, the facility shall follow the procedures specified in Part 6.2.1.2 of the MSGP, including the corrective action steps in Part 3.

Reporting Requirements: Monitoring data and corrective action reports shall be submitted to EPA and IDEQ in accordance with Part 7 of the MSGP. Submittal to EPA shall be through the NetDMR system.

Dr. Balthasar B. Buhidar  
Idaho Department of Environmental Quality  
Twin Falls Regional Office  
605 Addison Avenue West, Suite 110  
Twin Falls, ID 83301  
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