



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3123

WATER DIVISION

MAY 21, 2010

Reply to Attn of: 19-C04

Mr. Dan Anderson
Winfield Solutions, LLC
1994 Highland Avenue East
Twin Falls, ID 83301

Re: Additional Monitoring Requirements for RSA Microtech under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR05J00F

Dear Mr. Anderson:

The purpose of this letter is to notify you of watershed based monitoring 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 RSA Microtech facility at 1994 Highland Avenue East in Twin Falls, Idaho (Facility) discharges into the Twin Falls Municipal Stormwater System, which is part of the Upper Snake River/ Rock Creek watershed. The State of Idaho Department of Environmental Quality (IDEQ) has established TMDLs for fecal coliform bacteria as measured by *Escherichia coli* (*E. coli*), total phosphorus (TP), sedimentation / siltation, and total suspended solids (TSS) for the Upper Snake River/ Rock Creek watershed.

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, TSS, and *E. coli* following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. This is in addition to the nationally set industrial sector sampling.

Parameter	Benchmark Values	Source of Value
TSS	52 mg/L	Upper Snake/Rock Subbasin TMDL (July 2000)
TP	0.100 mg/L	Upper Snake/Rock Subbasin TMDL (July 2000) and 2005 Upper Snake Rock TMDL Modification Report
<i>E. coli</i>	126 colony forming units /100 mL (geometric mean) with a "trigger"	Upper Snake/Rock Subbasin TMDL (July 2000) and 2005 Upper Snake Rock TMDL Modification Report

Parameter	Benchmark Values	Source of Value
	value of 406 colony forming units /100 mL	

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

Sincerely,



Michael Lidgard, Branch Chief
Permits, Drinking Water, & Infrastructure Branch

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