



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

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

OFFICE OF  
WATER AND  
WATERSHEDS

DEC 04 2015

Reply to Attn of: OWW-191

Rambo Sand and Gravel, Inc.  
Attention: Tim Rambo  
2700 South Middleton Road  
Nampa, ID 83686

Re: Additional Monitoring Requirements for Rambo Sand and Gravel, Caldwell under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053108

Dear Mr. Rambo:

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 Rambo Sand and Gravel facility at 15245 Highway 20/26 in Caldwell, Idaho (Facility) discharges into the Boise River. The Boise River is listed as impaired for total phosphorus (TP), temperature, fecal coliform bacteria as measured by *Escherichia coli* (*E.coli*), flow regime alterations, habitat alterations, and sedimentation/siltation as measured by total suspended solids (TSS). The State of Idaho Department of Environmental Quality (IDEQ) has established Total Daily Maximum Loads (TMDL) for TSS, TP, and *E. coli* for the Boise River.

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).

**Sediment:** The Lower Boise River TMDL target for sediment as TSS is no more than 50 mg/L for 60 days and no more than 80 mg/L for 14 days between April 1 and September 30. However, the TMDL further identifies that sand and gravel facilities operating under NPDES permits had limitations of 30 mg/L monthly and 45 mg/L weekly maximum averages. The limitations were deemed adequate to meet the TMDL requirements since these TSS concentration limits are below the TMDL threshold, and any runoff provides dilution relative to the criterion. However, as you are aware, the effluent limit for this type of facility is 25mg/L TSS, thus, there is no change to your TSS monitoring requirements resulting from the TMDL.

*Bacteria:* For bacteria, the target is a 126 Geometric Mean or 406 Instantaneous Maximum colony forming units per 100 ml. However, the Lower Boise River TMDL identifies that normal sand and gravel operations do not discharge fecal coliform bacteria. As a result, bacteria monitoring requirements do not apply to this facility.

*Total Phosphorus (TP):* TP monitoring will be required for this facility as per the Lower Boise River TP TMDL.

Parameter	Benchmark Values	Source of Value
Total Phosphorus	0.1 mg/L May 1-Sept 30 0.35 mg/L Oct 1- April 30	Lower Boise River TMDL 2015 Total Phosphorus Addendum

#### 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.

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

Sincerely,



Michael J. Lidgard, Manager  
NPDES Permits Unit

cc: Lance Holloway, Idaho Department of Environmental Quality