



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-191

DEC 15 2017

Patrick Clark  
Staker Parsons Companies  
2350 South 1900 West  
Ogden, UT 84401

Re: Additional Monitoring Requirements for Rupert RMC under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053251

Dear Mr. Clark:

I apologize for the duplicative nature of this letter. We unintentionally referenced the wrong segment of the Snake River in our previous letter 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 Rupert RMC at 709 South H Street in Rupert, Idaho (Facility) discharges into the Snake River via the municipal storm drain system. Rupert is part of the Lake Walcott TMDLs that the State of Idaho Department of Environmental Quality (IDEQ) has established for oil & grease, total phosphorus (TP), and sediment.

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 oil & grease, total phosphorus, and total suspended solids following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1.

Parameter	Benchmark Values	Source of Value
oil and grease	5 mg/L	The Lake Walcott Subbasin Assessment, Total Maximum Daily Load, and Implementation Plan, 2000, page 127

Parameter	Benchmark Values	Source of Value
total phosphorus	0.08 mg/L	The Lake Walcott Subbasin Assessment, Total Maximum Daily Load, and Implementation Plan, 2000, page 143
total suspended solids	50 mg/L	The Lake Walcott Subbasin Assessment, Total Maximum Daily Load, and Implementation Plan, 2000, page 138

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

Sincerely,

  
 for   
 Susan Poulsom, Acting Manager  
 NPDES Permits Unit

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