



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
WATER AND
WATERSHEDS

FEB 04 2016

Reply to Attn of: OWW-191

Seneca Foods Corporation
Attn: Chris Mayes
25 North 6th Street
Payette, ID 83661

Re: Bacteria monitoring for Seneca Foods Corporation under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053114

Dear Mr. Mayes:

The U.S. Environmental Protection Agency (EPA) received your documentation regarding the low likelihood of the vegetable and food processing operations conducted by Seneca Foods at 25 North 6th Street in Payette, Idaho (Facility) contributing fecal coliform bacteria as measured by *Escherichia coli* (*E.coli*) to the Payette River.

EPA discussed the Seneca Foods documentation with the Idaho Department of Environmental Quality (IDEQ) watershed manager. The consensus was to significantly reduce the amount of monitoring, but that some data are still needed to help IDEQ as they endeavor to further identify the sources of impairment in this stretch of the Payette River.

Revised Specific Requirements

In addition to the monitoring requirements and effluent limitations associated with your industrial category (U-Food and Kindred Products), pursuant to Part 2.2.2.1 and 6.2.4.1 of the MSGP, the Facility is required to conduct storm water monitoring for *E.coli* once a year for the first two years of the 2015 Multi Sector General Permit for industrial storm water cycle. If both samples are below the target value, then no further *E.coli* monitoring is required for the 2015 permit term. If one or both samples are above the target value, discussion with IDEQ and EPA on next steps will be needed.

Parameter	Target Value	Source of Value
<i>E. coli</i>	126 Geometric Mean or 406 Instantaneous Maximum colony forming units per 100 ml	Lower Payette River Subbasin Assessment and Total Maximum Daily Load (December 1999)

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Lidgard". The signature is fluid and cursive, with the first name "Michael" and last name "Lidgard" clearly distinguishable.

Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Lance Holloway, Idaho Department of Environmental Quality
