



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 04 2015

J.R. Simplot Company
Attn: Monty Johnson
1130 West Highway 30
Pocatello, Idaho 83204

Re: Additional Monitoring Requirements for the Lanes Creek Phosphate Mine under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053044

Dear Mr. Johnson:

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 2015 Multi-Sector General Permit for Storm water Discharges Associated with Industrial Activity (MSGP), if this facility becomes active during the 2015 permit term. Based on the information provided in your Notice of Intent (NOI), storm water from the Lanes Creek Phosphate Mine (Facility) on Lanes Creek Road discharges into Lanes Creek. The State of Idaho Department of Environmental Quality (IDEQ) has established a Total Maximum Daily Load (TMDL) for sediment for Lanes Creek. This letter summarizes the additional TMDL related monitoring requirements.

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 if any additional limits or controls are necessary for your discharge to be consistent with the assumptions of any available waste load allocation in the TMDL, or if coverage under an individual permit is necessary in accordance with 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, should the Facility become active during the permit term, it is required to conduct storm water monitoring for TSS at the discharges to Lanes Creek following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. Because turbidity is typically easier to monitor, and a relationship between turbidity and TSS can be established, we are requiring turbidity monitoring; if you find that it would be preferable to do TSS, please let us know.

Turbidity is to be measured:

1. immediately upstream from the discharge point and outside any visible plume; and
2. immediately downstream from the discharge point and within any visible plume.

While this sampling is to be done in the framework of benchmark monitoring to determine whether the facility is contributing to the impairment, your results are to be compared to the Idaho Water Quality Standards for turbidity. Turbidity is allowed up to 50 NTUs above the background measurement instantaneously or up to 25 NTUs above background measurement for more than 10 days. Any single sampling event that exceeds the 50 NTU standard, or any series of samples indicating an exceedance of the 25 NTU standard, constitutes a violation of the permit triggering the need for corrective actions.

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: Lynn Van Every, Idaho Department of Environmental Quality

Attachment

Attachment A
ADDITIONAL MONITORING REQUIREMENTS

Parameter	Water Quality Standard	Source of Value
TSS	Not to exceed background turbidity level by more than 50 NTU for a discharge less than 24 hours, not to exceed background turbidity level by 25 NTU for more than 10 consecutive days	December 2001 Blackfoot River TMDL Waterbody Assessment and Total Maximum Daily Load, Section 250, State of Idaho Water Quality Standards IDAPA 58.01.02

Monitoring Locations: All outfalls. The facility may use the “substantially identical” provisions of the MSGP, if they apply (such as Parts 3.6 and 6.1.1). Turbidity is to be measured:

3. immediately upstream from the discharge point and outside any visible plume; and
4. immediately downstream from the discharge point and within any visible plume.

Monitoring Schedule: Follow the schedule outlined in the MSGP in Part 6.2.4.1 Impaired Waters 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 4.

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

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