



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

Simplot Transportation
Attention: Bill Moad
323 La Fond Street
Caldwell, Idaho 83605

Re: Additional Monitoring Requirements for Simplot Transportation under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053097

Dear Mr. Moad:

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 Stormwater Discharges Associated with Industrial Activity (MSGP). Based on the information provided in your Notice of Intent (NOI), storm water from the Simplot Transportation facility at 323 La Fond Street in Caldwell, Idaho (Facility) discharges into the Boise River and to Dixie Drain. The Boise River is listed as impaired for fecal coliform bacteria as measured by *Escherichia coli* (*E.coli*), total phosphorus (TP), flow regime alterations, habitat alterations, temperature, and total suspended solids (TSS). In addition, the State of Idaho Department of Environmental Quality (IDEQ) has established TMDLs for the Boise River, as discussed in more detail below.

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 TSS, *E.coli*, and TP following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1.

Parameter	Target Values	Source of Value
TSS	50 mg/L	2010 IDEQ Integrated Report, 2008 Lower Boise TMDL Addendum, and 1999 Lower Boise River TMDL.

Parameter	Target Values	Source of Value
<i>E. coli</i>	406 colony forming units /100 mL	2010 IDEQ Integrated Report, 2008 Lower Boise TMDL Addendum, and 1999 Lower Boise River TMDL.
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

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

Sincerely,



Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Lance Holloway, Idaho Department of Environmental Quality