



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

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

OFFICE OF  
WATER AND  
WATERSHEDS

Reply to Attention of: OWW-191

NOV 3 2017

George Scherer  
Simplot Western Stockmen's  
223 Rodeo Avenue  
Caldwell, ID 83605

Re: Additional Monitoring Requirements for Simplot Western Stockmen's, Incorporated under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053118

Dear Mr. Scherer:

The purpose of this letter is to notify you of two additional 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 Western Stockmen's facility at 223 Rodeo Avenue in Caldwell, Idaho (Facility) discharges into the South Drain, which is part of the Boise River watershed. The State of Idaho Department of Environmental Quality established Total Daily Maximum Loads (TMDLs) for the Lower Boise River watershed for total phosphorus, sediment, and bacteria as *Escherichia coli* (*E.coli*). I apologize that our first communication inadvertently left out sediment and bacteria.

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 total phosphorus, TSS, and *E.coli* following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. We will be updating your Discharge Monitoring Report form to reflect the addition of TSS and *E.coli*.

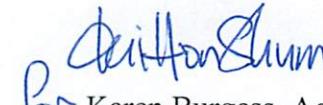
Parameter	Benchmark Values	Source of Value
Total Phosphorus	0.1 mg/L May 1-Sept 30 0.35 mg/L Oct 1- April 30	Lower Boise River TMDL 2015 Total Phosphorus Addendum
TSS	33 mg/L	Lower Boise River TMDL, 2015 Sediment and Bacteria Addendum, Table 27
<i>E.coli</i>	126 cfu/100 mL	Lower Boise River TMDL, 2015 Sediment and Bacteria Addendum, Part 5.4.4

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).

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

Sincerely,

  
for Karen Burgess, Acting Manager

NPDES Permits Unit

cc: Lance Holloway, Idaho Department of Environmental Quality