



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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

OFFICE OF
WATER AND WATERSHEDS

AUG - 9 2016

Reply to Attn of: OWW-191

Mr. Joel Strafelda
Union Pacific Railroad
1400 Douglas St
Omaha, NE 68179

Re: Additional Monitoring Requirements for the Union Pacific Railroad Pocatello Yard under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR050009

Dear Mr. Strafelda:

The purpose of this letter is to notify you of watershed based 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 Storm water Discharges Associated with Industrial Activity (MSGP). Based on the information provided in your Notice of Intent (NOI), storm water from the Union Pacific Railroad Pocatello Yard facility at 300 South Harrison in Pocatello, Idaho (Facility) discharges into the Portneuf River. The Portneuf River is listed as impaired for flow alteration, fecal coliform as measured by *Escherichia coli* (*E.coli*), oil and grease, suspended sediment, and total phosphorus. The State of Idaho Department of Environmental Quality (IDEQ) has established Total Maximum Daily Loads (TMDLs) for these, as discussed in more detail below.

Basis for EPA to Add Additional Requirements

The TMDL targets for the Portneuf River from the February 2010 Portneuf River TMDL Revision and Addendum are summarized in this table:

Pollutant	Target
Total Suspended Solids	35 mg/L (low flow) 80 mg/L (high flow)
Total Phosphorus	0.07 mg/L (low flow) 0.125 mg/L (high flow)
<i>Escherichia coli</i>	126 organisms/100 mL
Oil and Grease	5 mg/L

Where high flow months include March, April, May, and June.

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, should the Facility have a storm water discharge, it is required to conduct storm water monitoring for *E.coli*, Oil & Grease, Total Phosphorus, and TSS following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. Follow the schedule outlined in the MSGP in Part 6.2.4.2 Impaired Waters Monitoring Schedule. In addition to submitting the data electronically to EPA through the NetDMR system, send a copy to IDEQ as well:

Lynn Van Every
DEQ Pocatello Regional Office
444 Hospital Way #300
Pocatello, ID 83201
(208) 236-6160
lynn.vanevery@deq.idaho.gov

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

Sincerely,



Michael J. Lidgard
Manager
NPDES Permits Unit

cc: Lynn Van Every, Idaho Department of Environmental Quality