



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

United Parcel Service, Inc.  
Attn: Russell Stott  
6707 N Basin Avenue  
Portland, OR 97217

Re: Additional Monitoring Requirements for United Parcel Service, Inc under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053169 and IDR053170

Dear Mr. Stott:

The purpose of this letter is to notify you of watershed based monitoring 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). Based on the information provided in your Notices of Intent (NOI), storm water from the United Parcel Service facility at 1632 Elm Steet in Twin Falls, Idaho (Facility) discharges into the Snake River, which is listed as impaired for fecal coliform bacteria as measured by *Escherichia coli* (*E.coli*), total phosphorus (TP), sedimentation / siltation, and total suspended solids (TSS). The State of Idaho Department of Environmental Quality (IDEQ) has established TMDLs for TP, TSS, and *e. coli*.

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 TP, TSS, and *E.coli* following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. This is in addition to the nationally set industrial sector sampling.

Parameter	Benchmark Values	Source of Value
TSS	52 mg/L	Upper Snake/Rock Subbasin TMDL (July 2000)
TP	0.100 mg/L	Upper Snake/Rock Subbasin TMDL (July 2000) and 2005 Upper Snake Rock TMDL Modification Report

Parameter	Benchmark Values	Source of Value
E. coli	126 colony forming units /100 mL (geometric mean) with a "trigger" value of 406 colony forming units /100 mL	Upper Snake/Rock Subbasin TMDL (July 2000) and 2005 Upper Snake Rock TMDL Modification Report

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

Sincerely,



Michael J. Lidgard, Manager  
NPDES Permits Unit

cc: Dr. Balthasar Buhidar, Idaho Department of Environmental Quality