



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

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

OFFICE OF  
WATER AND  
WATERSHEDS

NOV 19 2015

Reply to Attn of: OWW-191

Waste Management, Inc.  
Attn: David Price-Williams  
825 Kootenai Cutoff Road  
Sandpoint, ID 83864

Re: TMDL Monitoring Requirements for the Waste Management Facility under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053087

Dear Mr. Price-Williams:

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 Storm water Discharges Associated with Industrial Activity (MSGP). Based on the information provided in your Notice of Intent (NOI), storm water from the Waste Management, Inc. facility at 825 Kootenai Cutoff Road (the Facility) in Sandpoint, Idaho discharges into Sand Creek, which is listed as impaired for sediment and temperature. The State of Idaho Department of Environmental Quality (IDEQ) has established Total Maximum Daily Loads (TMDL) for sediment and for temperature.

Basis for EPA to Add Additional Requirements

Section 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 Section 6.2.5 of the MSGP (allowing EPA to notify a facility of additional monitoring requirements).

As described in the letter sent automatically from EPA's NOI processing center, this Facility has no monitoring due to industry sector - Sector: P-Land Transportation and Warehousing. 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 suspended solids (TSS) following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. No monitoring for temperature is required at this time.

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.

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	Pend Oreille Tributaries Sediment Total Maximum Daily Loads (December 2007), Section 250, State of Idaho Water Quality Standards IDAPA 58.01.02

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. 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 and triggers the need for corrective actions at your facility.

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: June Bergquist, Idaho Department of Environmental Quality