



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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

OFFICE OF
WATER AND
WATERSHEDS

DEC 18 2015

Reply to Attn of: OWW-191

Dan Bersanti
Solvay USA Incorporated
8 Cedar Brook Drive
Cranbury, NJ 08512

Re: Watershed Specific Monitoring Requirements for the Wooley Valley Mine under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053043

Dear Mr. Bersanti:

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 2015 Multi-Sector General Permit for Storm water Discharges Associated with Industrial Activity (MSGP), should the facility become active during the permit term. Based on the information provided in your Notice of Intent (NOI), storm water from the Wooley Valley Mine near the intersection of CNF roads 199 and 172 near Soda Springs, Idaho (Facility) discharges into the Upper Angus Creek, Upper Lone Pine Creek, and the Blackfoot River. Upper Angus Creek is impaired for Sediment, Bacteria, Habitat, Selenium, and Temperature. This stretch of the Blackfoot River is listed as impaired for sediment, temperature, dissolved oxygen, and selenium. The State of Idaho Department of Environmental Quality (IDEQ) has established Total Maximum Daily Loads (TMDLs) for sediment and bacteria in Upper Angus Creek and for sediment and temperature for the Blackfoot River.

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, if the Facility becomes active during the permit term, the Facility is required to conduct storm water monitoring for TSS following the standard monitoring procedures outlined in the MSGP at Part 6.2. 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

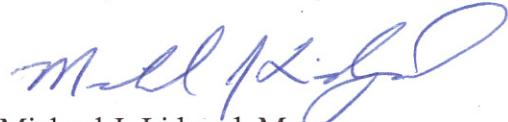
2. immediately downstream from the discharge point and within any visible plume. While this sampling is to be done in the framework of benchmark monitoring to determine whether the facility is contributing to the impairment, your results are to be compared to the Idaho Water Quality Standards for turbidity. Turbidity shall not exceed background turbidity by more than fifty (50) NTU instantaneously or more than twenty-five (25) NTU for more than ten (10) consecutive days. 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 triggering the need for corrective actions.

Should the mine become active and monitoring commence, in addition to submitting data through EPA's electronic system, copies of the monitoring reports shall be sent to:

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

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: Lynn Van Every, Idaho Department of Environmental Quality