



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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

OFFICE OF
WATER AND
WATERSHEDS

JAN 31 2018

Reply to Attn of: OWW-191

Ruben Byerley
10990 Roe Avenue, MS-A650
Overland Park, KS 66211

Re: Additional Monitoring Requirements for YRC Freight (662) under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053255

Dear Mr. Byerley:

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 Notice of Intent (NOI), storm water from the YRC Freight (662) facility at 304 6th Avenue West in Twin Falls, Idaho (Facility) discharges into Rock Creek, 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* for the Upper Snake River/ Rock Creek watershed and for the Rock Creek TMDL, a subcomponent or sub TMDL of the Upper Snake Rock TMDL. It also is listed for the same three parameters.

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 or (206) 553-1772.

Sincerely,



Michael J. Lidgard, Manager
NPDES Permits Unit

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