Table A-6.—Additional Effective Pollutant Control Options for Timber Product Facilities That Surface PROTECT OR PRESERVE

Activity	Associated BMPs
Wood surface protection and preserving activities.	Extend drip time in process areas before moving to storage areas.
	Pave and berm areas used by equipment that has come in contact with treatment chemicals. Dedicate equipment that is used for treatment activities to that specific purpose only to preven the tracking of treatment chemicals to other areas on the site. Locate treatment chemical loading and unloading areas away from high traffic areas where tracking of the chemical may occur.
	Provide drip pads under conveyance equipment from treatment process areas. Provide frequent visual inspections of treatment chemical loading and unloading areas during and after activities occur to identify any spills or leaks needing clean-up. Cover and/or enclose treatment areas.
	Provide containment in treated wood storage areas. Cover storage areas to prevent contact of treated wood products with precipitation. Elevate stored, treated wood products to prevent contact with runon/runoff.

NPDES Storm Water Group Application—Part 1. Received by EPA March 18, 1991 through December 31, 1992.

"Regulatory Guidance and Waste Reduction Manual for United States Sawmills (Draft)," EPA Office of Solid Waste, January 12, 1993.

"Background Document Supporting the Proposed Listing of Wastes From Wood Preservation and Surface Protection Processes," EPA Office

of Solid Waste, July 1987.

"Chlorophenate Wood Protection, Recommendations for Design and Operation," Environment Canada, December 1983.

Wood Preserving; Identification and Listing of Hazardous Wastes; Final Rule, "FEDERAL REGISTER," Volume 55, No. 235, December 6, 1990.

Selected pages from "Texas Best Management Practices for Silviculture," Texas Forestry Association, 1989. Submitted for inclusion by American Pulpwood Association, Washington, D.C.

Control of sediments leaving the site should also be considered by timber product facilities as sediments contribute to the total suspended solids in the storm water discharges. There are several areas of the site that may be prone to erosion due to intense industrial activities. These areas include, but are not limited to: loading and unloading areas, access roads, material handling areas, storage areas, and any other areas where heavy equipment and vehicle use is prevalent. Specific erosion and sediment controls should be implemented to minimize the discharge of sediments from the site. Measurements that timber facilities may consider include, but are not limited to: stabilization measures such as seeding, mulching, chemical stabilization, sodding, soil retaining measures and dust control and structural measures such as sediment traps, contouring, sediment basins, check dams and silt fences.

5. Special Conditions

a. Prohibition of Non-storm Water Discharges. Today's permit authorizes, in addition to the discharges described in part III.A.2., an additional non-storm water discharge specific to the timber products industry that, when combined with storm water, is authorized to be discharged under this permit. To be authorized under the permit, the sources of non-storm water must be identified in the storm water pollution prevention plan prepared for the facility. Where these discharges occur, the plan must identify and ensure the implementation of appropriate pollution prevention measures for the non-storm water components of the discharge. Authorized discharges include the following: spray down of lumber and wood product storage yards.

Spray down of lumber and wood product in storage yards is intermittently performed for fire control and pest control. Discharges from spray down activities are not storm water discharges; however, resulting discharges created as a result of spray down of raw lumber and wood product storage yards are authorized under this section where no chemical additives are used in the spray down waters and no chemicals are applied to the wood during storage. EPA believes that this practice, when performed in compliance with the terms and conditions of this section, will not pose any additional risks to human health and the environment because it is an industrial activity which is performed intermittently and within the confines of an area that should already contain controls for pollutants in storm water discharges.

It should be noted that the following discharges are not authorized under this section: noncontact cooling wastewater; contact cooling wastewater; boiler blowdown and water treatment wastewater; and storm water from areas of surface protection hand spraying activities.

This prohibition of unpermitted non-storm water discharges ensures that these discharges are not inadvertently covered under this section and requires the permittee to submit the appropriate NPDES permit applications to gain coverage for the non-storm water portion of the discharge.

6. Storm Water Pollution Prevention Plan Requirements

Several storm water pollution prevention plan requirements are added in the section of today's permit for the timber products industry, in addition to the baseline conditions described in part VI.C. of today's fact sheet. These deal with the identification and description of potential pollutant sources, and requirements to meet specific good housekeeping, inspection, and sediment/erosion control measures. EPA is also recommending that several criteria be considered during the development of the storm water pollution prevention plan.

- a. Contents of the Plan
- (1) Description of Potential Pollutant Sources
- (a) Drainage—There are no additional requirements beyond those described in Part VI.C.2.a. of this fact sheet.
- (b) Inventory of Exposed Materials—This section will require those facilities that have conducted activities associated with wood preserving and wood surface protection with pentachlorophenol formulations, creosote formulations, or arsenic/