chromium formulations in the past to identify: areas where soils are contaminated, treatment equipment, and/or stored materials which remain as a result of these operations. This section will also require the identification of any management practices being employed to minimize the contact of these materials with storm water runoff.

EPA has added these requirements because it is aware through studies performed for the hazardous waste listing process that sites where wood surface protection and wood preserving chemicals have been used in the past continue to contribute pollutants to the storm water discharges that come in contact with them, even once the industrial activity has ceased.36 In particular, soils that have been contaminated with formulation chemicals, equipment such as dipping tanks and those used for material handling, and wastes and materials that are still stored on the site may continue to release pollutants. EPA is requiring the facility to identify these pollutant sources so that appropriate controls can be implemented.

During the EPA process to list wastes from wood preservation and surface protection processes, data were gathered that showed that the concentration of constituents (of the treatment chemicals) in storm water runoff, in some instances, were equivalent to those concentrations found in process wastewaters. These studies also found high concentrations of phenolic compounds, pentachlorodifluron and phenanthrenes, and metals in soils contaminated with process residuals at several sites. These concentrations were attributed to treated wood drippage and precipitation washoff of treated woods.37

Where facilities have used chlorophenolic, creosote, or chromiumcopper-arsenic formulations for wood surface protection or preserving activities onsite in the past, and information is available, EPA is requiring that the facility inventory the following: areas where soils are contaminated, treatment equipment, and treated materials remain. Once these areas are identified, measures to minimize their exposure to storm water or to limit discharge of pollutants into storm water must be implemented. EPA is requiring this evaluation because soils, equipment, and other materials that are contaminated by treatment chemicals may continue to be a source

of pollutants and can contribute to the contamination of storm water runoff.

(c) Non-storm Water Discharges— There are no additional requirements beyond those described in Part III.A.2. of this permit.

(d) Risk Identification and Summary of Potential Pollutant Sources—There are not additional requirements beyond those described in Part VI.C.2.f. of this fact sheet.

(2) Measures and Controls. As contained in Part VIII.A.5. of this fact sheet, EPA has set forth a number of options which are effective in controlling releases of pollutants to storm water discharges associated with industrial activity. Due to the success of BMPs as a cost effective method of pollution control, EPA is requiring that all facilities consider the implementation of BMPs in the following areas of the site: log, lumber and other wood product storage areas; residue storage areas, loading and unloading areas; material handling areas; chemical storage areas; and equipment/vehicle maintenance, storage and repair areas. The conditions of this section also require facilities that surface protect and/or preserve wood products to address specific BMPs for wood surface protection and preserving

EPA believes it is appropriate to require that permittees indicate in their storm water pollution prevention plan all potential sources of pollution. Effective pollution control measures are currently being implemented at timber product facilities and/or are identified in literature sources specific to timber products facilities. Additional practices may also be found in the "Storm Water Management for Industrial Activities, **Developing Pollution Prevention and** Best Management Practices" (EPA 832-R-92-006), EPA, September 1992. The determination of the appropriateness or inappropriateness of a measure must be indicated in the facility's storm water management plan.

(a) Good Housekeeping—In addition to typical good housekeeping measures that require the maintenance of areas which may contribute pollutants to storm water in a clean and orderly manner, the pollution prevention plan must specifically address good housekeeping measures and the specific frequency of performance of these measures which are designed to: (1) limit the discharge of wood debris; (2) minimize the leachate generated from

decaying wood materials; and (3) minimize the generation of dust.

EPA has specified that BMPs limit the discharge of solids because storm water discharges containing TSS and BOD<sub>5</sub> are prevalent at timber products facilities and can often be controlled by good housekeeping measures.

(b) Preventive Maintenance—This section requires periodic removal of debris from ditches, swales, diversion, containment basins, and infiltration measures. The discharge of solids at timber product facilities may inhibit the performance of storm water controls if they are not maintained properly.

(c) Spill Prevention and Response Procedures—This section requires the development of schedules for response procedures to limit the tracking of spilled materials to other areas of the site. Specifically, this section requires that leaks or spills of wood surface protection or preservation chemicals be cleaned up immediately.

Requirements have been placed in this section to limit the tracking of significant materials that have been leaked or spilled on the site from containers, facility equipment, or onsite vehicles. Of particular concern is the tracking of leaks or spills of treatment chemicals outside near where storm water controls are in place. This may occur, for example, during the filling of storage tanks. Vehicles or equipment used to transfer materials may come into contact with any materials spilled during the filling or emptying of tanks. As the vehicles move to other locations at the site, such material may be tracked and eventually lead to contamination of storm water discharges.

(d) Inspections—Facility operators must conduct visual inspections of BMPs on a quarterly basis. Inspections must be performed quarterly at processing areas, transport areas, and treated wood storage areas of facilities performing wood surface protection and preservation activities. Quarterly inspections are designed to assess the usefulness of practices in minimizing drippage of treatment chemicals on unprotected soils and in areas that will come in contact with storm water discharges. In addition, all timber products facilities must conduct daily inspections of material handling activities and unloading and loading areas whenever activities are occurring in those areas (if activities are not occurring in those areas, no inspection is required).

<sup>&</sup>lt;sup>36</sup> "Background Document Supporting the Proposed Listing of Wastes from Surface Protection Processes, Part One Final Engineering Analysis Volume 1," EPA Office of Solid Wastes, February 1903

<sup>&</sup>lt;sup>37</sup> "Background Document Supporting the Proposed Listing of Wastes from Surface Protection Processes, Part One Final Engineering Analysis Volume 1," EPA Office of Solid Wastes, February