Records will be required to be maintained showing that these inspections have been performed at the required frequencies. In addition, a set of tracking or follow-up procedures must be implemented to ensure appropriate actions are taken based on the findings of the inspections. These records should be developed on a caseby-case basis depending upon the facility's needs.

(e) *Émployee Training*—There are no additional requirements beyond those listed in Part VI.C.3.e. of this fact sheet.

(f) Sediment and Erosion Control-This section requires that the following areas of the plant be considered for sediment and erosion controls: loading and unloading areas, access roads, material handling areas, storage areas, and any other areas where heavy equipment and vehicle use is prevalent. Sediment and erosion controls include: 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. This requirement is added because part 2 storm water group permit application data showed that many of the sites were discharging high TSS concentrations in their storm water discharges. Identifying those areas of the site where erosion occurs will aid the permittee in determining appropriate BMPs that will achieve a reduction in TSS loadings.

(g) Storm Water Management—There are no additional requirements beyond those described in Part VI.C.3.h. of this fact sheet.

(3) Comprehensive Site Compliance Evaluation. There are no additional requirements beyond those described in Part VI.C.4. of this fact sheet.

7. Monitoring and Reporting Requirements

(a) Analytical Monitoring Requirements. Under the revised

methodology for determining pollutants of concern for the timber products subsectors, all facilities must monitor their storm water discharges. EPA believes that timber product facilities may reduce the level of pollutants in storm water runoff from their sites through the development and proper implementation of the storm water pollution prevention plan requirements discussed in today's permit. In order to provide a tool for evaluating the effectiveness of the pollution prevention plan and to characterize the discharge for potential environmental impacts, today's permit requires timber products facilities to collect and analyze grab samples of their storm water discharges for the pollutants listed in the applicable Tables (A–7 through A–10). The pollutants listed in Tables A-7 through A-10 were found to be above benchmark levels for a significant portion of facilities in the subsectors that submitted quantitative data in the group application process. Because these pollutants have been reported at or above benchmark levels, EPA is requiring monitoring after the pollution prevention plan has been implemented to assess the effectiveness of the pollution prevention plan and to help ensure that a reduction of pollutants is realized.

Today's permit requires the wood preserving subsector to monitor for arsenic and copper. These parameters are commonly found in wood preservatives. The discharge data initially analyzed by EPA indicate that these parameters are found in the storm water discharges from wood preserving facilities. Review of additional sampling data revealed that there was a substantial portion of the facilities discharging these parameters in concentrations greater than the bench mark values. Therefore, EPA has determined that monitoring of arsenic and copper is necessary to ensure that the storm water pollution prevention

plans developed by wood preserving facilities adequately addresses sources of these parameters.

Under the Storm Water Regulations at 40 CFR 122.26(b)(14), EPA defined "storm water discharge associated with industrial activity". The focus of today's permit is to address the presence of pollutants that are associated with the industrial activities identified in this definition and that might be found in storm water discharges. Under the methodology for determining analytical monitoring requirements, described in section VI.E.1 of this fact sheet, nitrate plus nitrite nitrogen is above the bench mark concentrations for the wood preserving subsector. After a review of the nature of industrial activities and the significant materials exposed to storm water described by facilities in this subsector, EPA has determined that the higher concentrations of nitrate plus nitrite nitrogen are not likely to be caused by the industrial activity, but may be primarily due to non-industrial activities on-site. Today's permit does not require wood preserving facilities to conduct analytical monitoring for this parameter.

At a minimum, storm water discharges from timber products facilities must be monitored quarterly during the second year of permit coverage. Samples must be collected at least once in each of the following periods: January through March; April through June; July through September; and October through December. At the end of the second year of permit coverage, a facility must calculate the average concentration for each parameter listed in the applicable Tables (A–7 through A–10). If the permittee collects more than four grab samples in this period, then they must calculate an average concentration for each pollutant of concern for all samples analyzed.

TABLE A-7.—MONITORING REQUIREMENTS FOR GENERAL SAWMILLS AND PLANING MILLS

Pollutants of concern	Cut-off con- centration
Chemical Oxygen Demand (COD)	120 mg/L.
Total Suspended Solids (TSS)	100 mg/L.
Zinc, Total Recoverable	0.065 mg/L.