the pollution prevention plan. Less frequent inspections may allow facilities to delay inspections until after periods of high activity when the greatest potential for exposure of materials occurs. This section requires that the inspections take place while the facility is in operation because this is the only time when potential pollutant sources (such as malfunctioning dust control equipment or non-storm water discharges from equipment washing operations) may be evident. The inspectors must observe several portions of the site which EPA believes are potential sources of pollutants in storm water including: material handling areas, above ground storage tanks, hoppers or silos, dust collection/ containment systems, vehicle washing, and equipment cleaning areas.

(e) Employee Training—In addition to the requirements described in Part VI.C.3.e. of this fact sheet, the pollution prevention plan training requirements for facilities in the glass, clay, cement, concrete, and gypsum industries require that the employee training program address procedures for equipment and vehicle washing. This is because these are common activities in these industries which result in process wastewater which may be discharged into the storm water conveyance system. Training programs should focus on where and how equipment should be cleaned at the facility so that there will be no unpermitted discharge of wash water to the storm water conveyance system. EPA recommends that facilities conduct training annually at a minimum. However, more frequent training may be necessary at facilities with high turnover of employees or where employee participation is essential to the storm water pollution prevention plan.

(f) Recordkeeping and Internal Reporting Procedures—There are no additional recordkeeping and internal reporting procedure requirements for facilities in the stone, clay, glass or concrete products industries beyond than those described in Part VI.C.3.f. of this fact sheet.

(g) Non-storm Water Discharges— There are no additional non-storm water discharge certification requirements for facilities in the stone, clay, glass or concrete products industries beyond those described in Part VI.C.2.d. of this fact sheet with the exception of facilities engaged in production of concrete products. These facilities must include in the certification a description of measures which insure that process wastewater which results from washing of trucks, mixers, transport buckets, forms or other equipment are discharged in accordance with NPDES requirements or are recycled. These nonprocess wastewater discharges are common to this industry. However, these discharges are not eligible for coverage under this section and it is necessary to assess the facility for the presence of these discharges so that steps may be taken to eliminate the discharges or to cover the process discharges with a separate permit.

A number of facilities in the concrete products industry maintain wash water recycle/retention ponds which receive the process wastewater from equipment cleaning and other operations. These ponds may also receive a portion or all of the runoff from the industrial site. These facilities are required to provide an estimate of the depth of the 24-hour duration storm event that would be required to cause the recycle/retention pond to overflow and discharge to the waters of the United States. Methods to make this estimate can include, but are not limited to, the original design calculations for the recycle/retention pond or historical observation.

(h) Sediment and Erosion Control— There are no additional sediment and erosion control requirements for facilities in the stone, clay, glass, or concrete products industries beyond those described in Part VI.C.3.g. of this fact sheet.

(i) Management of Runoff—There are no additional requirements for management of runoff at facilities in the stone, clay, glass, or concrete products industries beyond than those described in Part VI.C.3.h. of this fact sheet.

(3) Comprehensive Site Compliance Evaluation. Facilities in the glass, clay, cement, concrete, and gypsum product sector must perform an annual site compliance evaluation as described in Part VI.C.4. of this fact sheet. For facilities in the concrete product manufacturing industries, the evaluation must specifically address the following portions of the site: above ground storage tanks, hoppers or silos; dust collection/containment systems; truck wash down; and equipment cleaning areas. Because these areas are the most likely sources of pollutants, these portions of the site must be thoroughly evaluated.

## 6. Numeric Effluent Limitations

Part XI.E.4. of today's permit establishes numeric effluent limitations for storm water discharges from storage areas for materials used or produced at cement manufacturing facilities. Discharges from these areas may not exceed a maximum TSS concentration of 50 mg/L. The pH of the discharges from these areas must be within the

range of 6.0 to 9.0. Untreated discharges from the facility which are a result of a storm with a rainfall depth greater than the 10-year, 24-hour storm event are not subject to this limitation. These effluent limitations are in accordance with 40 CFR 411.32 and 40 CFR 411.37. Effluent Guidelines and Standards, Cement Manufacturing Point Source Category, Materials Storage Piles Runoff Subcategory. These limitations represent the degree of effluent reduction attainable by the application of best practicable control technology and best conventional pollutant control technology. Dischargers subject to these numeric effluent limitations must be in compliance with the limits upon commencement of and for the entire term of this permit. Discharges that are associated with industrial activities that do not contain runoff from material storage areas at cement manufacturing facilities are not subject to the effluent limitation described above.

## 7. Monitoring and Reporting Requirements

a. Analytical Monitoring *Requirements*. EPA believes that glass, clay, cement, concrete, and gypsum product manufacturing 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, requires two of the four subsectors within the glass, clay, cement, concrete and gypsum product manufacturing sector to perform analytical monitoring.

The clay product subsector includes brick and structural clay tile manufacturers (SIC 3251), ceramic wall and floor tile manufacturers (SIC 3253), clay refractories (SIC 3255), manufacturers of structural clav products, not elsewhere classified (SIC 3259), manufacturers of vitreous china table and kitchen articles (SIC 3232), manufacturers of fine earthenware table and kitchen articles (SIC 3263), manufacturers of porcelain electrical supplies (SIC 3264), pottery products (SIC 3269) and non-clay refractories (3297). Data submitted by group applicants within this subsector show that a significant portion of the facilities discharge aluminum concentrations higher than bench mark values. Therefore facilities with these industrial activities must monitor for the pollutant identified in Table E-7.

The concrete and gypsum subsector includes concrete block and brick manufacturers (SIC 3271), concrete