discharges originating from the cleaning out of oil/water separators or sumps; discharges from bermed areas with a visible oily sheen or other visible signs of contamination; discharges resulting from casting cleaning or casting quench operations; discharges from slag quench or slag rinsing operations; and discharges from wet sand reclamation operations.

This final list of non-storm water discharges does not include discharges from oil/water separators and sumps, as was proposed. EPA intended to include only discharges originating from the cleaning or maintenance of these devices in this list.

The operators of non-storm water discharges must seek coverage under a separate NPDES permit if discharging to either a municipal separate storm sewer system or to waters of the United States.

## 6. Storm Water Pollution Prevention Plan Requirements

a. Contents of the Plan. All facilities covered by this section must identify a pollution prevention team, prepare a description of all potential pollutant sources at the facility, and identify measures and controls appropriate for the facility. These items must comply with the common requirements described in Part VI.C. of this fact sheet. In addition to these requirements, facilities covered by Part XI.F. of today's permit must provide the following additional information in their pollution prevention plan.

(1) Description of Potential Pollutant Sources. Facilities must identify on the site map the location of any and all pollution control equipment such as baghouses, wet scrubbers, electrostatic precipitators, etc. as well as any uncontrolled stack emissions which may be located onsite. The site map must also indicate the outfall locations and the types of discharges contained in the drainage areas of the outfalls (e.g. storm water and air conditioner condensate). In order to increase the readability of the map, the inventory of the types of discharges contained in each outfall may be kept as an attachment to the site map. Due to the hazardous nature of pollutants generated in this industry, and the potential for deposition of particulate matter from emissions, these emissions can be a significant contributor to pollutants at a facility and should be identified.

(2) Measures and Controls. There are typically five types of activity and materials present at facilities in the primary metals industry with potential impacts on storm water discharges. These have been discussed in today's

fact sheet and include: raw materials storage and handling; process activities related to furnace operations, casting, rolling, and extruding; waste material storage, handling, and disposal; erosion from unstabilized plant areas; and illicit discharges, spills, and leaks. Each of these areas that is applicable to a facility must be identified in the pollution prevention plan and evaluated with regard to the BMPs discussed.

(a) Good Housekeeping—This section requires that facilities implement measures to limit the amount of spilled, settled, and leaked materials which are washed away by storm water. These materials include coal dust or coke breeze, metal fines from finishing operations, particulate emissions from furnaces and ovens, as well as dust and dirt from plant yards. In paved or other impervious areas sweeping is an easy and effective way to reduce these pollutants. Sweeping frequency should be determined based on the rates of accumulation of a particular material and its potential impact on storm water discharges. Where significant particulates are generated in unstabilized areas of the plant, other measures may be necessary.

The large number of particulate generating processes and the makeup of these pollutants makes this an especially important aspect of pollution prevention at many facilities. Permittees must consider the storage of all such products under roof, in silos or covered hoppers, or under tarps to minimize exposure of particulates to precipitation and wind-blown losses.

Unstabilized areas at a site which may be related to material handling and storage or vehicle and equipment traffic should be considered for paving. These areas can build up significant levels of particulates from materials and material handling as well as soil and dust particles. Paving these areas allow good housekeeping measures to be practiced and make spills easier to clean up.

(b) Source Controls—Permittees must consider preventative measures to minimize the exposure of significant materials to storm water. Due to the large volumes of materials used in the primary metals industry, they are a significant potential source of pollutants in storm water discharges. Storage of a wide range of materials outside is common among many facilities and measures should be taken to reduce the potential for contamination of storm water.

Measures include moving materials inside, under roof or cover, removing waste materials from the premises, and establishing scheduled removal of wastes to minimize storage onsite. Other

measures to prevent runoff from contacting materials include swales, berms, dikes, or curbs to divert runoff away from significant materials or processes.

Source controls offer the most effective way to reduce pollutants in storm water discharges and are generally easier to implement than treatment measures.

(c) Preventive Maintenance—
Facilities must incorporate into their plan the inspection and maintenance of all equipment which could lead to releases of pollutants. This includes all particulate emissions control equipment, storage tanks and piping systems, and any other material handling equipment which could fail

and release pollutants.

All particulate pollution control equipment must be maintained to operate properly and effectively to control settling of particulate matter. The inspection of emissions control is particularly important as failures may not be immediately obvious and could lead to significant releases of particulate matter. Leaks or blockage in ducts, overflows of dust collection systems, or mechanical breakdown of scrubbers could all lead to heavy particulate emission which can be easily washed away by storm water discharges. Other potential losses include leaking tanks or valves which could contain a variety of acids, solvents, or other chemicals.

(d) Spill Prevention and Response Procedures—There are no additional requirements beyond those described in Part VI.C. of this fact sheet.

(e) Inspections—Primary metals facilities are required to conduct self inspections of all storage, process, and plant yard areas at least quarterly. These inspections will allow the effectiveness of the pollution prevention plan to be monitored. The potential for problems which could affect storm water are extremely varied and can have significant impacts over a short time period. These inspections are necessary to ensure that problems are identified and remedied as quickly as possible. Points of particular importance include pollution control equipment, material handling areas, and waste collection and disposal areas. Tanks, drums, silos, bins, and hoppers are other areas of potential concern.

(f) Employee Training—There are no additional requirements beyond those described in Part VI.C. of this fact sheet. 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