housekeeping practices provide a simple and inexpensive means of controlling pollutants from entering storm water and therefore will not be overly burdensome to regulated facilities.

EPA believes that frequent and thorough inspections are necessary to ensure adequate functioning of: sediment and erosion controls, leachate collection systems, intermediate and final covers, and significant materials storage containers. Failure of any of the aforementioned items could cause contamination of storm water with sediment, leachate, or significant materials stored onsite. EPA believes it is necessary to conduct inspections both during storm events and during dry weather. Inspections during dry periods allow facilities to identify and address any problems prior to a storm event, thereby minimizing the chance for storm water contamination. Inspections during significant storm events ensure that measures are functioning as originally intended and provide an opportunity for facilities to observe what materials and/or activities are exposed to storm water. Pollution prevention plans must address the specific inspection requirements for active and inactive landfills and land application sites described in Part XI.L.3.a.(3).(d) of today's permit.

Failures of significant materials storage containers, leachate collection and treatment systems, cover materials, and sedimentation and erosion controls can result in storm water contamination. EPA believes it is necessary to maintain these items in good working order to prevent storm water contamination. Consequently, EPA is requiring (in pollution prevention plans) that owners or operators ensure the maintenance of material storage areas to prevent leaking or rupture and all elements of leachate collection and treatment systems to prevent commingling of leachate with storm water. Pollution prevention plans must also describe measures to be taken to protect the integrity and effectiveness of any intermediate and final covers.

EPA believes controls are needed to reduce potential TSS contamination of storm water and to reduce suspended solids which have been carried by storm water before the discharge leaves the site. Therefore, EPA has chosen to require that pollution prevention plans address both stabilization and structural controls to reduce potential TSS loadings to surface waters.

## 5. Monitoring and Reporting Requirements

a. Analytical Monitoring Requirements. This section establishes separate requirements for municipal solid waste landfills (MSWLFs) and industrial landfills. These requirements are discussed below.

(1) MSWLFs. The Agency believes that the MSWLF criteria in 40 CFR 258.60 will effectively separate runoff from active and inactive areas at newer landfills. As a result, separate requirements have been established for active and inactive areas at MSWLF sites

For discharges from active landfill areas, the Agency believes that there is reasonable potential for runoff to contact waste materials. In these areas, runoff may also become commingled with leachate. In fact, a significant percentage of landfill facilities that submitted group applications, identified leachate and wastes as "exposed materials." In addition, total suspended solids (TSS) levels are also likely to be elevated where contact occurs with wastes, disturbed areas, and daily/intermediate cover materials.

At this time, the Agency does not believe that there are sufficient data available to establish numeric limits based on best available technology for storm water discharges from active MSWLF areas. The data submitted in the part 2 applications, as well as leachate data from available literature, suggest that a variety of constituents may be present at levels that are highly site-specific depending on the types and extent of contact with exposed wastes and extent of commingling with leachate. Furthermore, the volumes of runoff generated will be dependent on the frequency and intensity of precipitation events. For TSS, little or no data are available to characterize the TSS levels in active landfill area runoff and to assess the performance of treatment technologies/best management practices currently in use.

Therefore, in this section, EPA is requiring that landfill operators develop storm water pollution prevention plans. For active landfill areas, these plans should be tailored toward minimizing contact of storm water with waste materials. The plans should also include design and implementation of best management practices and/or treatment methods to control the pollutants likely to be found in runoff at the site. For the active portion of the landfill, this section also requires quarterly monitoring for TSS and total recoverable iron (see below) to quantify the performance of BMPs/treatment measures. These data may be used in the future in the development of individual and/or general permits to establish numeric limitations based on best available technology. It should also

be noted that EPA is currently in the process of developing effluent limitation guidelines for discharges of leachate from waste management facilities (including MSWLFs). Where these effluent guidelines apply to discharges from active areas, facilities will be required to comply with these requirements on the effective date.

For units/areas that ceased receiving wastes after October 1991, EPA believes that closure criteria under 40 CFR 258.60 will minimize or eliminate pollutant loadings from waste materials to storm water. For MSWLF units closed in accordance with these criteria, TSS should be the only pollutant of concern. Again, EPA does not believe that adequate data are currently available to establish a numeric limitation based on best available technology (BAT) for TSS in storm water discharges from inactive areas. TSS concentrations in untreated storm water discharges have not been sufficiently well characterized to address the site-specific variability arising from local geology and topography along with individual cover materials and reclamation practices. Furthermore, the available data do not support an assessment of the relative performance of specific BMPs/treatment measures. Quarterly TSS monitoring is required to provide additional data to evaluate the effectiveness of specific control measures.

The Agency is uncertain whether all MSWLF units which ceased receiving wastes prior to October 1991 will have been closed in such a manner to ensure long term stability and minimize the potential for runoff to contact wastes and leachate. Therefore, operators of units that were closed prior to October 1991 are required to conduct the same monitoring as required for active areas. This monitoring is intended to evaluate the integrity and performance of final cover materials in minimizing pollutant loadings to storm water discharges. Based on the results of this monitoring, the permitting authority may elect to continue/modify or terminate the required monitoring, provide for additional permit conditions (including specific BMPs and/or numeric limitations), or terminate coverage under the permit, as appropriate.

An exception from most monitoring requirements is provided for older landfill areas closed prior to October 1991 in accordance with State requirements that meet or exceed the final cover criteria in 40 CFR 258.60. Similar to newer units, TSS should be the only pollutant of concern at these sites and only quarterly TSS monitoring is required.