(a) Good Housekeeping—Permittees must describe protocols established to reduce the possibility of mishandling chemicals or equipment and training employees in good housekeeping techniques. Specifics of this plan must be communicated to appropriate plant personnel.

(b) Preventative Maintenance— Permittees are required to develop a preventative maintenance program that includes regular inspections and maintenance of storm water BMPs. The purpose of the inspections is to assess the effectiveness of the storm water pollution prevention plan. The inspections allow facility personnel to monitor the success or failure of elements of the plan on a regular basis. The use of an inspection checklist should be considered. A checklist ensures that all required areas are inspected, as well as providing documentation for the recordkeeping requirement.

(c) Spill Prevention and Response Procedures-Permittees are required to identify appropriate material handling procedures, storage requirements, containment or diversion equipment, and spill cleanup procedures that will minimize the potential for spills and in the event of a spill enable proper and timely response. Areas and activities that typically pose a high risk for spills at food and kindred products processing facilities include raw material unloading and product loading areas, material storage areas, and waste management areas (e.g., dumpsters, compactors). These activities and areas, and their accompanying drainage points, must be described in the plan.

(d) Inspections—In addition to the comprehensive site evaluation required under XI.U.6.b. (Comprehensive Site Compliance Evaluation) of this section of today's permit, qualified personnel must inspect designated equipment and areas of the facility at appropriate intervals as specified in the plan. Areas that are found to possibly contribute pollutants to storm water are identified in this section of today's permit as requisite areas for periodic scheduled inspections. A set of tracking or followup procedures must be used to ensure that appropriate actions are taken in response to the inspections. Records of inspections must be maintained. Inspections shall be carried out by qualified facility personnel at least once each year.

(e) Employee Training—Permittees must describe a program for informing personnel at all levels of responsibility of the components and goals of the storm water pollution prevention plan. Training should address topics such as good housekeeping, materials management, and spill response procedures. A schedule for conducting this training must be provided in the plan. Where appropriate, contractor personnel also must be trained in relevant aspects of storm water pollution prevention. 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—Permittees must describe procedures for developing and retaining records on the status and effectiveness of plan implementation. The plan must address spills, monitoring, and BMP inspection and maintenance activities. Ineffective BMPs must be reported and the date of their corrective action noted.

(g) Sediment and Erosion Control— Permittees must identify areas that, due to topography, activities, soils, cover materials, or other factors have a high potential for significant soil erosion. Measures to limit erosion in these areas must be identified.

(h) Management of Runoff— Permittees must provide a narrative assessment of traditional storm water management practices that divert, infiltrate, reuse, or otherwise manage storm water runoff so as to reduce the discharge of pollutants. Based on the assessment, the permittee must identify practices that are reasonable and appropriate for the facility and must describe the particular pollutant source area or activity to be controlled by each storm water management practice. Reasonable and appropriate practices must be implemented and maintained.

b. Comprehensive Site Compliance Evaluation. The storm water pollution prevention plan must describe the scope and content of comprehensive site evaluations that qualified personnel will conduct to (1) confirm the accuracy of the description of potential pollution sources contained in the plan, (2)determine the effectiveness of the plan, and (3) assess compliance with the terms and conditions of this section of today's permit. Comprehensive site compliance evaluations must be conducted at least annually for food and kindred products processing facilities. The individual or individuals who will conduct the evaluation must be identified in the plan and should be members of the pollution prevention team. Evaluation reports must be retained for at least 3 years after the date of the evaluation. Where compliance

evaluation schedules overlap with inspections required under XI.V.3.a.(3)(d) of this section, the compliance evaluation may be conducted in place of one such inspection.

Based on the results of each evaluation, the description of potential pollution sources, and measures and controls, the plan must be revised as appropriate within 2 weeks after each inspection. Changes in the measures and controls must be implemented on the site in a timely manner, and never more than 12 weeks after completion of the evaluation.

## 6. Monitoring and Reporting Requirements

a. Analytical Monitoring Requirements. EPA believes that food and kindred products 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, the permit requires grain mill products facilities and fats and oils products facilities to collect and analyze samples of their storm water discharges for the pollutants listed in Tables U-14 or U-15. The pollutants listed in Tables U-14 or U-15 were found to be above benchmark levels for a significant portion of facilities in these subsectors that submitted quantitative data in the group application process. Because these pollutants have been reported at benchmark levels from grain mill products and fats and oils products facilities, 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.

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, zinc is above the bench mark concentrations for the grain mill and beverage products subsectors. After a review of the nature of industrial activities and the significant materials exposed to storm