There are two major objectives to a pollution prevention plan: (1) To identify sources of pollution potentially affecting the quality of storm water discharges associated with an industrial activity from a facility; and (2) to describe and ensure implementation of practices to minimize and control pollutants in storm water discharges associated with industrial activity. Specific requirements for a pollution prevention plan for furniture and fixture manufacturing facilities are described below. These requirements must be implemented in addition to the pollution prevention plan provisions discussed previously, or any other industry-specific requirements to which the facility is subject. For example, facilities with coal piles must comply with the provisions for coal pile runoff, as well as the pollution prevention requirements for the furniture and fixture manufacturing industry.

a. Description of Potential Pollution Sources. Under the drainage requirements, the site map must show areas where the following activities take place, if applicable: fueling; vehicle and equipment maintenance and/or cleaning; loading and unloading; material storage (including tanks or other vessels used for liquid or waste storage); outdoor material processing; waste treatment, storage, or disposal; haul roads; access roads; and rail spurs. 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

b. Measures and Controls. Following completion of the source identification and assessment phase, the permittee must evaluate, select, and describe the pollution prevention measures, BMPs, and other controls that will be implemented at the facility. The permittee must assess the applicability of the following categories of BMPs for their site: discharge diversions, drainage/storm water conveyance systems, runoff dispersions, and good housekeeping measures. In addition, BMPs include processes, procedures, schedules of activities, prohibitions on practices, and other management practices that prevent or reduce the discharge of pollutants in storm water runoff.

The pollution prevention plan must discuss the reasons each selected structural control or BMP is appropriate for the facility and how each will address the potential sources of storm water pollution. The plan also must include a schedule specifying the time or times during which each control or practice will be implemented. In addition, the plan should discuss ways in which the controls and practices relate to one another and, when taken as a whole, produce an integrated and consistent approach for preventing or controlling potential storm water contamination problems.

Permittees are also required to develop a preventive maintenance program that includes regular inspections and maintenance of storm water BMPs. The maintenance program requires periodic removal of debris from discharge diversions and conveyance systems. These activities should be conducted particularly during wet seasons. Permittees already controlling their storm water runoff with impoundments or sedimentation ponds must include the maintenance schedules for these ponds in the pollution prevention plan.

Under the inspection requirements of the pollution prevention plan, operators of furniture and fixture manufacturing facilities are required to conduct quarterly inspections. The inspections shall include: (1) An assessment of the integrity of storm water discharge diversions, conveyance systems, sediment control and collection systems, and containment structures; (2) visual inspections of vegetative BMPs to determine if soil erosion has occurred; and (3) visual inspections of material handling and storage areas and other potential sources of pollution for evidence of actual or potential pollutant discharges of contaminated storm water.

EPA believes that this quick and simple description will allow the permittee to assess the effectiveness of his/her plan on a regular basis at very little cost. The inspection will provide meaningful results upon which the facility may act quickly. The frequency of this inspection will also allow for timely adjustments to be made to the pollution prevention plan. If a BMP is found to be ineffective, corrective action must be implemented. A set of tracking or follow-up procedures must be used to ensure that appropriate actions are taken in response to the inspections. The inspection is intended to be performed by facility staff. This hands on inspection will also enhance the staff's understanding of the storm water problems on that site and effects on the management practices that are included in the plan.

Under employee training, the permit does not specify the frequency, however, 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.

Under the recordkeeping and internal reporting procedures of the pollution prevention plan, the permittee must describe procedures for developing and retaining records on the status and effectiveness of plan implementation. The plan must address spills, monitoring (if applicable), and BMP inspection and maintenance activities. Ineffective BMPs must be recorded and the date of their corrective action noted. According to the pollution prevention plan requirements, the permittee must evaluate the appropriateness of each storm water BMP that diverts, infiltrates, reuses, or otherwise reduces the discharge of contaminated storm water. In addition, the permittee must describe the storm water pollutant source area or activity (i.e., loading and unloading operations, raw material storage piles etc.) to be controlled by each storm water management practice.

6. Monitoring and Reporting Requirements

a. Monitoring Requirements. The regulatory modifications at 40 CFR 122.44 (i)(2) established on April 2, 1992, grant permit writers the flexibility to reduce monitoring requirements in storm water discharge permits. EPA has determined that the potential for storm water discharges to contain pollutants above benchmark levels, because of the industrial activities and materials exposed to precipitation, does not support sampling at facilities covered by this section of today's permit. 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 and zinc are above the bench mark concentrations for the furniture and fixtures sector. After a review of the nature of industrial activities and the significant materials exposed to storm water described by facilities in this sector, EPA has determined that the higher concentrations of nitrate plus nitrite nitrogen and zinc are not likely to be caused by the industrial activity, but