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generated). Because of the industrial processes involved in leather tanning, BMPs that concentrate on source reduction, recycling and containment/ diversion will be the most helpful for reducing pollution in storm water runoff.

Source reduction BMPs include good housekeeping, materials management practices, preventive maintenance, spill prevention and response activities and employee training. Activities associated with good housekeeping include:

Operation and Maintenance—Keep floors clean and dry, regularly pick up garbage and waste materials, make sure equipment is working properly, routinely inspect for leaks or conditions that could lead to discharges of chemicals or contact of storm water with raw materials, intermediate materials, waste materials etc., reduce chemical spills resulting from carelessness and prepare program to control spills and carry out cleanups. Ensure that spill cleanup procedures are understood by employees. Eliminate unnecessary uses of water such as leaving hoses running.

Materials Storage and Maintenance— Store containers away from direct traffic routes to prevent accidental spills, stack containers according to manufacturers instructions to avoid damaging containers, store containers on pallets to prevent corrosion of containers, assign responsibility of hazardous material inventories to a limited number of people who are trained to handle hazardous materials.

Material Inventory Procedures— Identify all chemical substances present in the work place, label all containers, clearly mark on the inventory hazardous materials that require special handling, storage or use.

Preventive Maintenance—Identify equipment, systems and facility areas that should be inspected, schedule periodic inspections of the equipment and systems, timely adjustments, repair, or replacement of equipment and systems. Maintain complete records on inspections, equipment, and systems. Install automatic monitoring devices to detect abnormal discharge of gases and hazardous substances.

Containment/diversion BMPs involve segregating areas of concern by covering or berming the activity and controlling dust. Diversion dikes, curbs and berms are temporary or permanent diversion structures that prevent runoff from passing beyond a certain point, and divert runoff away from its intended path. Dikes, curbs and berms are already in use at some leather tanning facilities.

Part 1 group application data indicate that BMPs have not been widely implemented at the representative sampling facilities. The most commonly listed material management practice is roofing and covers. Table Z–4 lists BMPs associated with different activities that take place at leather tanning facilities.

TABLE Z-4.-LIST OF BEST MANAGEMENT PRACTICES

Activity	Best management practices
Temporary Outdoor Storage of fresh or brine	Store hides indoors if possible.
cured hides.	Cover the hides with a roof or temporary covering (e.g., polyethylene, tarpaulin etc.). Minimize storm water runon by enclosing the area or building a berm around the area. Inspect area regularly for proper implementation of good housekeeping and control measures.
Beamhouse Operations	Store chemical drums & bags and empty lime & depilatory chemical containers indoors if pos- sible, preventive maintenance.
	Cover chemical drums & bags, empty lime & depilatory chemical containers and leather scraps with roof or temporary covering (e.g., tarpaulins, polyethylene) and store on elevated impermeable surface.
	Curbing, containment dikes around chemical storage, empty lime & depilatory chemical con- tainers and leather scrap storage area.
	Inspect area regularly for leaking drums, broken bags, proper implementation of good house- keeping and control measures, (broken cracked dikes), material inventory, material storage and operation & maintenance.
	Clean up leaks & spills quickly & completely, use drip pans for leaking equipment. Good Housekeeping—all paved areas should be swept regularly, eliminate unnecessary flush- ing with water and label chemical drums and containers.
	Employee training on good housekeeping, proper handling of chemicals.
Tanyards	BMPs for Tanyards (empty chemical containers and hides, leather dust, shavings) are the same as those listed above for Beamhouse Activities.
Retan and wet finish	Dust reduction through frequent inspection of vacuum, collector (bag & cyclone), and filter sys-
	tems.
	Dust reduction through enclosure and covering.
	Preventive maintenance/inspection of dust collection systems.
	Good Housekeeping-regular sweeping of paved areas, eliminate unnecessary flushing with water and label chemical drums and containers.
	Employee training on good housekeeping, proper handling of chemicals.
Dry Finish	Preventive maintenance, inspection of spray booths.
	Employee training on proper disposal of spent solvents.
Receiving and shipping	Cover shipping & receiving area.
	Cover trucks.
	Vehicle positioning—locating trucks while transferring materials to prevent spills onto the ground surface.
	Grade berm or curb area to prevent storm water runon contamination, divert rain gutters away
	from loading area.
	Clean spills immediately.
	Inspect trucks for leaks.
	Employee training in spill prevention.
Liquid Storage in Above Ground Tanks	Clearly tag valves to avoid human error.
	Install overflow protection devices on tank systems to warn operator or to automatically shut down transfer pumps when tanks reach full capacity.
	Secondary containment around tanks.