containing a high concentration of just one pollutant and therefore monitoring should be conducted to determine if controls are adequately reducing the levels of the discharge.

Selection of Additional High Priority Sectors Based Upon Factors Other Than Sampling Data

When determining industry-specific monitoring requirements for facilities under the multi-sector permit, EPA identified three additional industry sectors based upon a review of the degree of exposure, types of materials exposed, and the need for more sampling data than what was submitted in the group application. The industry sectors identified are hazardous waste treatment, storage and disposal facilities (TSDFs), auto salvage yards and airports.

Commenters felt that selection of these industries as priority sectors was arbitrary, particularly for those sectors where it was determined that the monitoring data submitted was not adequate (automobile salvage yards and airports). Under today's permit EPA is continuing to require monitoring for these three sectors which were selected based upon criteria other than the methodology employing the part 2 sampling data. It is EPA's best professional judgement that these industries merit further monitoring based on anticipated presence of significant pollutants. The data submitted was insufficient to disprove the EPA conclusion that these types of facilities have a significant potential to discharge contaminants. EPA believes the data submitted for these industries is insufficient and not representative of the discharges from the facilities and therefore additional data should be collected.

Should the Multi-Sector Permit Require Facilities That Must Monitor for Total Recoverable Metals To Also Monitor for pH?

Not all sectors of the proposed multisector permit require facilities that must monitor for total recoverable metals to also monitor for pH. Because it is known that the toxicity of metals is affected in part by pH, EPA requested comment as to whether to add pH to the list of parameters to be monitored in those sectors where total recoverable metals are also being chemically monitored.

Several commenters agreed with the addition of pH as a parameter that should be measured for all sectors where monitoring of a total recoverable metal is required. These commenters argued that it is not an expensive

burden, requires little effort, and the data is needed to evaluate the impact of metals in the storm water discharge. One commenter stated that monitoring of pH would be appropriate since the pH of local rainfalls varies by the particular region where a facility is located. One commenter supported the use of this parameter only if toxicity changes in the metals could be demonstrated to occur at pH values presented in the group data. Several commenters stated that rather than the pH of the discharge being monitored that it is the pH of the receiving stream that is of critical concern. One commenter supported the monitoring of this parameter only if the EPA granted facilities the option of monitoring for other total recoverable metals or dissolved metals.

One commenter stated that monitoring of pH would only be necessary if pH in the receiving water is a problem and should be considered only after the total loading of an entire watershed is established showing that fluctuations in pH are not the result of pollutants from industrial activities, but are from sources such as acid rain. One commenter stated that they have performed studies which show that pH is not a concern for the food and kindred products sector.

The majority of the commenters were opposed to the blanket requirement to monitor pH whenever total recoverable metals were required to be monitored. The opposition was mainly due to the inherent problems associated with acid rain and in evaluating and linking the cause of toxicity to industrial activities and the associated storm water discharge. Several commenters strongly opposed a requirement to monitor pH believing it to be unnecessary. Many of those opposed felt the analysis should be left to the discretion of the facility in the development of their storm water pollution prevention plan.

EPA will not require facilities to also monitor pH for every sector that must monitor total recoverable metals. Rather, the decision will be left to the discretion of the facility or will be specifically required within a sector for other reasons. Monitoring the pH of the storm water may not provide an indication of the effectiveness of the storm water pollution prevention plan because of the influences of factors other than the facility's industrial activities on the pH of the discharge (i.e., acid rain). Allowing the facility to evaluate the effectiveness of the measurement of pH for each particular facility will alleviate the misinterpretation of the data that may result. This may be particularly

true for extreme pH values beyond those normally anticipated with acid rain.

Support or Opposition to Baseline Monitoring Requirements

In the proposed multi-sector permit, EPA modified some sector monitoring requirements based upon the group application data submitted. EPA requested comment for each industrial sector on the changed requirements from the 1992 baseline general permit that were proposed in the multi-sector permit. Fifteen of the sixteen commenters that commented on this issue were opposed to the monitoring requirements in the baseline permit. Several supported the deviations from the baseline permit which they claimed was based only on theoretical and potential discharges, whereas the monitoring requirements for the multisector permit were based on actual storm water discharge data from the industries. A couple of commenters stated that the use of the baseline monitoring requirements would defeat the purpose of the money and effort spent on collecting data for the application process.

One commenter, while still opposed to any monitoring requirements for the fiberglass and aluminum boat builders, supported the monitoring parameters in section IX.R.8 of the multi-sector permit in lieu of the baseline permit. Two commenters supported the change from the baseline permit requirements, which triggered monitoring at 50,000 flight operations per year, for airports. One commenter in the rubber and miscellaneous sector was concerned that *any* analytical monitoring was being associated with the sector because they do not have any outside storage.

Another commenter supported the changes in the requirements for the Glass, Clay, Cement, Concrete, and Gypsum product sector where only the ready-mix concrete plants must monitor because visual monitoring is more appropriate for determining whether BMPs are effective. One commenter from the steam electric group felt that the monitoring requirements from the baseline permit were more appropriate, particularly the annual monitoring, compared to the monthly visual observations and quarterly chemical monitoring in the multi-sector permit. The commenter stated that pollutants in their storm water discharge are essentially unvarying and that the original list of pollutants in the baseline general permit provided a more appropriate set of indicators of storm water contamination from their site.

EPA has reviewed both sets of monitoring requirements and as a result