inspections of material handling and loading/unloading areas in the permit. Therefore, the language in today's multisector permit will clarify this requirement.

Numerous comments were received on the requirement to perform monthly inspections at processing areas, transport areas and treated wood storage areas of facilities performing wood surface protection and preservation activities. The commenters argued that these inspections are unnecessary because employees are currently trained to prevent drippage of treatment chemicals on unprotected soils. They feel these requirements are duplicative of requirements under RCRA Subpart W. EPA disagrees that these inspections are unnecessary. Documentation associated with the listing of wood preserving and wood surface protection wastes at 40 CFR 261 showed that there remains a potential for storm water to become contaminated through incidental activities such as tracking of material, fugitive emissions, rushed operations and miscellaneous other activities. EPA therefore believes it is necessary to require these inspections so that site personnel may identify sources of pollutants and to implement BMPs to minimize contamination of storm water discharges at each facility. Where inspections of this type are being conducted for another program requirement, such as for RCRA, those inspections can suffice for meeting the requirements of this permit.

Some commenters were concerned that the requirement to identify areas where soils are contaminated as a result of past surface protection and preserving activities would be too burdensome. Some commenters stated that it might require extensive and very expensive testing of areas to determine where residual contamination remained and may even require expensive environmental site assessments. Several commenters argued that areas where contamination still remains could be identified through the site inspections, and once identified could then be remediated. In response, EPA disagrees that the requirement is too burdensome. The proposed permit stated that "Where information is available, facilities that have used chlorophenolic, creosote, or chromium-copper-arsenic formulations for wood surface protection or preserving activities on site in the past should identify in the inventory the following: areas of contaminated soils, treatment equipment and stored materials that still remain and practices employed to minimize the contact of these materials with storm water runoff." If information is readily

available, then the pollution prevention team would merely incorporate that information into the plan and identify pollution prevention measures to minimize contact with run-off. If the information is not available, no additional site assessments would be required. The fact sheet language in today's multi-sector permit clarifies this requirement.

In general, commenters supported the proposal that timber product facilities that do not surface protect or preserve should not be required to monitor their storm water discharges. These commenters agreed that storm water pollution prevention plans provide the necessary protection for controlling storm water pollution at timber product facilities. Many comments were received on the sampling and monitoring required by those timber products facilities that use formulations for wood surface protection and preservation. Many of the commenters were opposed to the sampling and monitoring requirements because they would impose significant administrative and economic burdens on wood preserving facilities in particular. They stated that the data obtained through the proposed monitoring program would provide marginal benefits to EPA because the highly variable data could not be used to measure the performance of BMPs. They believe that the efforts and expenses would be better used in developing and implementing pollution control measures. A few commenters also argued that wood preserving facilities should not have to monitor for TSS, COD and BOD because the requirement is based on concentrations from NURP studies which were performed in residential areas and because these pollutants are not toxic to aquatic life. Some commenters were opposed to monitoring requirements at remote storage sites because there is neither meteorological equipment nor staff available and transportation to these sites is very difficult.

Some commenters did not agree with the requirement for facilities that use copper-chromium-arsenic formulations to sample for both copper and arsenic because it is not supported in the data. These commenters suggested that, if additional data was needed, only one of the parameters (copper) be monitored because sampling for both was unnecessary. Other commenters argued that arsenic should not be required to be sampled because, while toxic to humans if ingested, it is not toxic to aquatic organisms. Numerous commenters argued that timber product facilities where chlorophenolic formulations were used in the past for wood

preservation should not be required to monitor storm water discharges for pentachlorophenol where prior testing has shown that there is no chlorophenolic residue at the facility.

A number of commenters in this sector also commented about: the proposed cut-off concentrations that would be used to determine whether facilities must sample during the fourth year of the permit term or under the alternative certification provisions of the permit; the variability of pollutant concentrations in storm water discharges; the eventual imposition of effluent limitations based on the cutoff concentrations; the use of total recoverable metals analyses; the toxicity of pollutants to aquatic organisms given receiving water dilution during wet weather events; the alternative monitoring provisions proposed in the fact sheet; the use of visual monitoring; the quality of the part II sampling database; the identification of priority sectors for monitoring and other monitoring issues that are discussed under the monitoring section of this summary.

As a result of the comments on monitoring throughout the multi-sector permit, EPA has revised the methodology for determining which sectors need to monitor (See discussion under monitoring). The methodology developed for the final permit analyzed the group application data based on three digit (or more) sub-sectorization of the industries represented in the groups. Based on this revised methodology, the timber products sector has been divided into four sub-sectors for data analysis. These four sub-sectors are SIC code groups 2421 (sawmills and planing mills), 2491 (wood preserving), 2411 (log storage), and 2426/2429/243/244/ 245/2493/2499 (millwork, veneer, wood containers, plywood and structural wood, and wood products not elsewhere classified). Using the data in the group application database, and data submitted subsequent to development of the database, EPA analyzed the monitoring requirements for these four sub-sectors using the revised benchmarks. As a result, EPA is now requiring monitoring of all four subsectors in the timber products sector. SIC code 2421 will monitor for COD, TSS and zinc. SIC code group 2491 will monitor for total recoverable arsenic and total recoverable copper, SIC code group 2411 will monitor for TSS and SIC code groups 2426/2429/243/244/245/2493/ 2499 will monitor for COD and TSS. In addition, the timber products industry must perform quarterly visual examinations of their storm water pollution prevention plan. EPA believes