Based on the revised methodology for determining pollutants of concern (discussed under monitoring), EPA has determined that limited analytical monitoring requirements are necessary to aid the asphalt or lubricant manufacturing facilities in evaluating the effectiveness of the permit. Today's permit contains analytical monitoring requirements for total suspended solids (TSS) from these facilities. There are also compliance monitoring requirements for asphalt emulsion manufacturing facilities which are subject to the storm water effluent limitations guidelines. Facilities in this sector should not overlook this requirement.

One commenter indicated that the frequency of the visual examination of storm water discharge was burdensome and suggested reducing the frequency to a semi-annual basis. In response EPA believes that facilities must perform visual examinations of storm water discharges in order to assess the effectiveness of the storm water pollution prevention plan over the course of the year. The discharge of pollutants may be impacted by the seasonal weather changes, or operational changes that occur over the course of 6 months. It is necessary for a facility to examine their storm water discharge on a quarterly basis to assess how these changes impact the quality of the discharge. The same commenter also suggested that a facility not be required to perform the visual exam after two consecutive "clean" samples are observed. EPA does not agree with the commenters suggestion. It is not possible to define a "clean" sample for a visual examination, because the visual exam is subjective. The exam is not intended to provide facilities with an absolute means of comparing their discharge to other facilities' discharges, it is intended to provide operators with a relative comparison of the discharge quality from one period to another.

One commenter indicated that the compliance monitoring requirements and numerical effluent limitations should be eliminated for the asphalt roofing emulsion manufacturing facilities. The commenter felt that group application sampling data showed there was no need for monitoring. EPA's response is that the numerical effluent limitations for storm water discharges associated with asphalt roofing or pavement emulsion must be included in any NPDES permit which covers these discharges as required by the effluent limitations guideline at 40 CFR Part 443. The permit must also require at least annual monitoring for any pollutant limited by the effluent limitations

guideline. These are requirements which cannot be modified in the context of this permit issuance.

## Stone, Clay, Glass, and Concrete Products

There were a number of comments received regarding the proposed permit requirements for the glass, clay, cement, concrete, and gypsum product manufacturing sector. These comments focused primarily upon three areas; the types of industrial activities addressed under the sector, the storm water pollution prevention plan storm water pollution prevention plan requirements, and the monitoring requirements.

Several commenters indicated that they believed the sector included too diverse a range of industrial activities, and that sectors should be created for each of the various industrial activities currently covered under the one sector. Commenters were concerned that industries with relatively little discharge of contaminated storm water had been placed into a sector with industries with higher contamination, and that more stringent monitoring requirements were being placed upon their industry than would have been required had their industry or group been considered separately.

In response to these and other concerns, EPA has revised its methodology for determining the monitoring requirements. EPA divided this sector into four subsectors for further data analyses and comparison to benchmarks. The subsectors included: glass products manufacturing, cement manufacturing, clay products manufacturing, and concrete products manufacturing. Monitoring requirements were determined based upon this subsector analyses.

However, in relation to the storm water pollution prevention plan requirements for the sector, these requirements remain the same as proposed. EPA believes there is sufficient flexibility within these requirements to allow the each permittee to select the most appropriate measures for their site. Therefore, subsectored pollution prevention plan requirements were not added to the final permit.

Commenters also expressed concern that the storm water pollution prevention plan requirements for this sector are burdensome, particularly the requirements for storage of fine granular solids, removal of spilled materials, and management of runoff. One commenter stated that storage of bulk dry materials in an enclosed area would be too costly, and that covering the materials with a tarp would be impractical given the

need to access the piles. In response, EPA wishes to clarify that today's permit requires that facilities prevent the exposure of fine, dry granular solids to storm water. The permit does not require these materials to be enclosed. or permanently covered. At a minimum, a facility must cover these storage piles while the piles are not in use and while it is raining. However, the piles need not be constantly covered, provided a tarp or other removable cover is near by. It should also be clarified that the requirement does not apply to coarse granular material such as sand or gravel, only to fine granular materials that are readily suspended or dissolved into storm water such as cement or fly ash.

The same commenter stated that a facility should be permitted to select the BMPs for removal of spilled materials from paved areas. In response, EPA wishes to clarify that the permit allows "regular sweeping, or other equivalent measures" therefore the permit does provide the permittee flexibility in selecting the methods for removing spilled materials.

The majority of the comments received regarding the requirements for glass, clay, cement, concrete, and gypsum product manufacturing facilities addressed the monitoring requirements contained in the proposed permit. Many of these comments addressed the methodology for selection of this sector as a "priority" monitoring sector. These comments expressed concern that the monitoring methodology did not consider the variation in industrial activities within the sector.

The comments also expressed concern that the bench mark or "cut-off" concentrations were too restrictive. As a result of these and other comments, EPA has modified the methodology for selection of industries as "priority monitoring sectors (comments regarding the methodology for selection are addressed separately in this attachment). The selection of industries and parameters for monitoring was made at the subsector level. Sampling requirements for the glass subsector, the cement subsector, the clay subsector, and the concrete subsector were determined separately. The results of the modification in the monitoring methodology are a reduced list of parameters for analytical monitoring in the concrete, clay and cement products manufacturing facilities.

A number of commenters endorsed the alternative monitoring requirements which were included in the fact sheet for the proposed permit because these requirements only consisted of visual examination of discharge without any