facilities with BMPs already in place are still required to develop a pollution prevention plan. Existing BMPs may, however, be used as part of the pollution prevention plan, if it is determined that the BMPs adequately address the potential pollutant sources at the site. The Agency notes that Table M-3 of the proposed fact sheet, Storm Water BMPs for Automobile Salvage Yards, is a list of BMPs to be considered when developing the pollution prevention plan. These BMPs may not, however, be appropriate under all conditions, nor may this list be all inclusive. Permittees should use this table as guidance when considering which BMPs to implement at their site.

Numerous commenters indicated that the costs for automobile salvage yard facilities to comply with the proposed multi-sector permit will be too burdensome. Several comments stated that the cost would exceed \$15,000 per facility. Costs, including the time and money necessary to meet the proposed documentation and monitoring requirements, may force some facilities out of business. Several comments stated that smaller facilities would have to hire a professional engineering firm to develop the pollution prevention plan and an additional employee to perform the recordkeeping and monitoring requirements. The cost estimates referred to in these comments are based on the requirements in the proposed multi-sector permit. The Agency notes that several of these proposed requirements have been reduced in today's final permit and that these reductions will significantly reduce the cost of compliance. The reductions include requiring analytical monitoring only for certain facilities, a pollutant-by-pollutant alternative certification for those facilities that are subject to analytical monitoring, a decrease in the minimum frequency of visual examinations of storm water discharges from monthly to quarterly, and a reduction in the minimum employee training requirements. EPA believes it is feasible, even for small businesses, to fulfill the requirements of today's permit without hiring outside help. The Agency has provided guidance, such as the manual; "Storm Water Management for Industrial Activities; Developing Pollution Prevention Plans and Best Management Practices" to assist permittees with the development and implementation of pollution prevention plans.

A few commenters stated that the comprehensive site compliance evaluation for automobile salvage yard facilities should only be required once a year, not twice as was proposed in the

multi-sector permit. The Agency agrees with these commenters and notes that today's final permit has been revised to require a comprehensive site compliance evaluation at a minimum of once per year in this and all other sectors.

A few commenters stated that the inspection requirements for automobile salvage yard facilities are too burdensome. In particular, commenters stated that the requirement to implement any changes in measures and controls as a result of these inspections within 12 weeks should be changed. Although 12 weeks is enough time to make management procedural changes, commenters felt it is not sufficient to implement structural changes to the facility. Commenters requested a 1 year time frame to implement such changes.

The Agency believes that the majority of the changes required as a result of the quarterly inspections will be procedural or programmatic in nature. Therefore, a 12 week time-frame should be sufficient for the implementation of the majority of the changes to the plan under this section. In the event that a permittee believes structural changes to the facility are necessary, the permittee should contact their EPA permitting authority and discuss a possible schedule for implementing the changes. Changes requiring construction are allowed additional time for implementation under the terms of the permit.

Several commenters stated that the quarterly inspections for leaks from vehicles and outdoor storage areas are too burdensome. Comprehensive site compliance evaluations and the requirement to remove fluids from vehicles when they arrive on-site, or as soon as feasible thereafter, make quarterly inspections unnecessary. One commenter questioned why quarterly inspections for leaks from vehicles is necessary if fluids must be removed from vehicles when they arrive on-site, or as soon as feasible thereafter. The Agency notes that there are certain circumstances in which fluids cannot be removed from vehicles immediately. Therefore, quarterly inspections should include checking vehicles which still have fluids for leaks. Vehicles that have been completely drained of fluids are not of concern for this inspection. EPA believes that the quarterly inspections required under the proposed permit target areas with a significant potential to contaminate storm water, such as outdoor storage of containers. Therefore, today's final permit includes quarterly inspection requirements.

A few commenters stated that EPA should allow facilities in the

Automobile Salvage Yard sector additional time to construct structures needed to control contamination of storm water runoff. One suggestion was to allow these facilities 5 years to construct storm water pollution control structures, as long as the construction design and schedule is developed by a professional engineer (PE) and is 50% complete within 24 months, 75% complete within 36 months, and 100% complete within 60 months. Compliance deadlines under the multisector permit allow facilities up to 3 years from the effective date of the permit to construct structural BMPs that are called for in the pollution prevention plan. The Agency believes that in most cases 3 years is sufficient time to complete construction of structural BMPs. Permittees that feel they cannot complete construction within this specified time period should contact the applicable EPA Regional office.

Several commenters stated that the proposed recordkeeping requirements would be the most expensive segment for facilities subject to the Automobile Salvage Yard sector. Facilities should not be required to document the volume of fluids removed from vehicles as they are received since transporters or recyclers document the total volume of fluids removed from the site when collection is made for recyling. Commenters also indicated that reports should be prepared at the time the materials are sold or recycled, and not necessarily every month. In response, EPA has deleted these requirements from the final permit since many permittee already track such information for other purposes.

Scrap Recycling and Waste Recycling Industries

A number of commenters requested clarification on the prohibition of the discharge of washwater from tipping floor areas. To clarify, the final permit specifically prohibits the discharged of washwater from tipping floor areas to any part of a storm sewer system. This is considered a process wastewater discharge which is not authorized by this storm water permit. This permit also does not authorize discharges to the sanitary sewer system.

A substantial number of commenters expressed concerns regarding the appropriateness and costs associated with requiring the usage of structural erosion and sediment controls at scrap recycling facilities. Commenters frequently stated that such a requirement was inappropriate at this stage of the permitting process and that scrap recycling facilities should be