monitoring data from NURP and the Gold Book.

After reviewing the comments and data, EPA revised the "benchmark" values and the methodology used to determine which industries will monitor for their storm water. Based upon the revised methodology, steam electric facilities are required to conduct chemical monitoring of their storm water discharges for total recoverable iron. Monitoring discharges from coal piles is still required if coal is utilized or stored at the facility in conformance with 40 CFR 423.

Several commenters complained that there would be exorbitant additional costs involved with the "benchmark" monitoring requirements and/or BMP's required by and peculiar to the Multi-Sector permit. Several commenters requested justification for those requirements which they felt were unjustified and more stringent than the requirements of the general baseline

Since the Multi-Sector permit was created as a result of the group application process using data supplied by and specific to each industry sector, the permit requirements have been tailored to the unique needs of each industry sector. For this reason, EPA believes that industries that obtain coverage under the Multi-Sector permit and comply with the terms of that permit will reduce pollutant discharges to waters of the United States to a greater degree than would occur under coverage of the baseline general permit. However, coverage is available to those industries under either permit upon the submission of the appropriate notice of intent (NOI). All the BMPs mentioned in the Multi-Sector permit are suggestions utilized to illustrate the intent of the permit and illustrate a method by which compliance can be achieved. Other equivalent BMPs may be implemented, at the discretion of the permittee, to attain those illustrated results. EPA realizes that the permittee is most familiar with the particular industrial site and is best qualified to determine which BMPs are equal to, or perhaps more effective in satisfying the intent of the permit. EPA encourages the use of these other BMPs or practices which attain or improve upon the Multi-Sector permit goals, especially those which are easier or less costly to implement.

Sector O of the Multi-Sector permit focuses attention on both coal pile runoff and any other storm water discharge associated with industrial activity at steam electric power generating facilities. Coal pile runoff has, however, been identified as a particularly serious threat to water

quality and therefore the EPA has developed effluent guidelines (40 CFR 423) to regulate its discharge. The requirements for coal pile runoff from the guidelines have been incorporated into the multi-sector general permit.

Storm water discharges from woodburning power plants are not covered under the Multi-Sector permit since no applications were received from woodburning power plants under the group permit application process. EPA developed the Multi-Sector permit in response to only those facilities who applied for group permit coverage. Wood-burning plants may obtain coverage under the baseline general permit or an individual storm water permit.

For the sake of consistency with the other sectors in the multi-sector permit and to eliminate the duplication of regulation, EPA has removed reference to the requirements for permit coverage for industrial activities associated with construction. It must be noted, however, that a permit is required for storm water discharges from construction activities which additively disturb five or more acres, and such coverage is available through EPA's general permit for storm water discharges associated with construction activity.

Several comments dealt with the topic of monthly visual examination and documentation of storm water discharges as being burdensome, unjustified, and potentially impossible to comply with when dealing with the random occurrences of storm events and the numbers of outfalls to be sampled. EPA has relaxed the required frequency of visual examinations from a monthly to a quarterly basis. EPA has included the requirement for only limited analytical monitoring of storm water discharges from Sector O facilities based upon "benchmark" values. Annual compliance monitoring/reporting of runoff from coal storage areas/piles is also required as specified in 40 CFR 423. To aid in the reduction of resources necessary to comply with the visual sampling requirements for facilities with several outfalls, the permittee, if practicable, can combine and/or eliminate outfalls, apply the representative discharge provisions of VI.C.4. of the permit or utilize automatic samplers.

Motor Freight, Rail, and Passenger Transportation, Petroleum Bulk Oil Stations, and the U.S. Postal Service

There were a number of comments received regarding the requirements for the sector P, the ground transportation sector. The comments focused on grouping of facility types in the sector,

eligibility under the sector, and the storm water pollution prevention plan requirements.

Several commenters, including members of the passenger bus, tank truck carrier, motor carrier, and warehouse industries, were concerned with the grouping of a range of transportation facilities in the ground transportation sector. Concern was particularly expressed regarding the 'long-term implications' of this "umbrella" permitting practice. In response, EPA has retained the original grouping of transportation facilities as presented in the proposed permit. Although the gross operations of these different types of facilities may differ, EPA found that the vehicle maintenance and repair activities are remarkably similar and pose equally similar threats to storm water pollution. Further, EPA found that comparable best management practices were used at these varying facilities. In terms of the long term effect of this grouping, EPA assures the commenters any additional permitting efforts will revisit the appropriateness of sector groupings based upon information as it becomes available.

One commenter expressed particular concern about the inclusion of warehouses in the land transportation sector. EPA grouped regulated warehouse facilities in the land transportation sector because, when such facilities have exposure to storm water, it is often due to exposure of vehicle maintenance shops and equipment cleaning operations. EPA reminds the commenter that facilities are required to meet the permit conditions for all industrial activities (and hence sectors) which they may have onsite.

Several commenters, including members of the passenger bus, tank truck carrier, and warehouse industries, requested that EPA clarify its position regarding vehicle wash waters and its definition of "commingling" of storm water and vehicle wash waters. Vehicle wash waters, water discharged from a vehicle washing activity, are required to be permitted separately from the storm water discharges from such areas. Although most facilities design such wash areas to drain most, if not all, wash waters during the washing activity, some facilities may have stagnant pools of washwater that do not drain or discharge. If a storm event results in the discharge of both the remaining wash waters and storm water, the storm water permit would only cover the storm water discharges and not commingled wastes. Similarly, if vehicle washing activities are performed during a storm event or immediately