quantities to be analyzed. Commenters felt that insufficient samples were collected for four other pollutants. Commenters indicated that the inclusion of metals in the monitoring requirements for all sector members. when so little data was submitted for these pollutants, is not statistically valid. Commenters also took exception to EPA's decision to aggregate data for the food processing industry because lack of subsector-specific data does not substantiate monitoring requirements for these pollutants. Commenters believe that monitoring data that does exist for the sector shows no difference between industrial and residential/ commercial areas. Also, commenters suggested that storm water data has shown to be very inconsistent and unrepresentative of the actual impact of discharges on receiving waters. Another common issues raised by the commenters was that the benchmark concentrations are unobtainable even with good BMPs. Commenters believe these levels are comparable to tertiary treatment standards for a full treatment system. Also, these cutoff levels appear to presage future permit limits for the industry which EPA has not demonstrated are necessary.

Several commenters believed that, if monitoring had to be conducted, the alternative monitoring is more appropriate since it more accurately reflects wastes from food and kindred products facilities. However, they suggested there should be an escape clause as with the proposed monitoring allowing facilities to only monitor for those pollutants expected to be present. Commenters felt that monitoring requirements will divert limited funds away from pollution prevention techniques needed to reduce pollutants in storm water as monitoring data show a correlation between enhanced housekeeping and preventative maintenance and reduced pollutant concentrations. Commenters concluded that combining visual examinations and a comprehensive site inspection is a much more appropriate way to evaluate storm water than monitoring.

Commenters also stated that EPA should give weight to the facilities who met Federal requirements in the application process and enforce against the thousands of facilities that ignored their obligations under the law rather than spending money on additional paperwork burdens. They suggested that sample results from the group applications should be credited towards the alternative monitoring requirements. Conversely, others commented that EPA should not provide "credit" to these groups, rather, EPA should recognize

the difficulty facilities experience in collecting adequate storm water samples from acceptable rainfall events, especially small business facilities and facilities in arid climates.

Realistically, commenters stated, very few facilities will be able to obtain all four quarterly samples and almost none will be able to collect all monthly samples for visual observation without constructing automatic sampling facilities. They pointed out that EPA has previously indicated manual sampling was acceptable and automatic sampling would not be required.

Additional concerns were raised with regard to specific pollutants recommended for analysis in the proposed monitoring. For example commenters pointed out that ammonia data are not presented in the proposed permit fact sheet but the proposed permit states that ammonia exceeds benchmark values. Commenters stated that absent data to substantiate, EPA should not require food and kindred products facilities to monitor for ammonia. Also, EPA should clarify its intent in requiring ammonia monitoring. Specifically, the proposed permit does not state whether EPA is concerned with the nitrogen load (i.e., TKN) on receiving waters, making ammonia monitoring irrelevant, or with the toxic effects of ammonia, making TKN monitoring unnecessary.

Commenters also argued that EPA does not discuss iron and zinc as pollutants of concern for the industry, raising question as to why food facilities have to sample for these parameters. EPA should work with the few facilities or subsectors of the industry that are found to have metals in their discharge rather than requiring all food and kindred products facilities to monitor these pollutants. Also, the proposed cutoff for iron (0.3 mg/l) is overly protective. The gold book acute aquatic life freshwater criteria is 1.0 mg/l. Commenters also pointed out that fecal coliform data would be superfluous to BOD and TSS data for the industry and testing is much more difficult.

Based on the comments on the proposed permit, EPA has eliminated the alternative monitoring requirements and re-evaluated the proposed monitoring requirements for the sector through conducting a subsector analysis for the industry. The sub-sector analysis identified only two of the nine subsectors as having pollutants in storm water at concentrations above the revised benchmark values. As a result, most facilities in the food and kindred products sector no longer are required to collect and chemically analyze storm water samples. Only two sub-sectors

will monitor: Grain Mill Products manufacturing (SIC code group 204) which will monitor for TSS and Fats and Oils manufacturing (SIC code group 207) which will monitor for TSS, BOD, COD and nitrate plus nitrite nitrogen.

Commenters in this sector also felt that additional requirements for pesticide storage were unnecessary. They contend that pesticide storage and use are currently regulated under FIFRA, State pesticide laws and the FDA. Further, anyone applying pesticides must be a certified applicator, trained in the safe and prudent use, as well as proper storage, of these products.

In response, EPA disagrees with the commenters statement that current pesticide storage and use regulations are adequate to prevent storm water contamination. Criteria for evaluating pesticide use and storage and criteria for evaluating storm water contamination from pesticide use and storage are not the same. With the increased use of pesticides at food and kindred products facilities compared to facilities in other sectors, EPA believes that the application and storage of these pesticides with storm water in mind is crucial to an effective storm water pollution prevention plan in this sector.

Textile Mill Products

Comments on Sector V, Textile Mill Products, focused primarily on the pollution prevention plan requirements and monitoring requirements. One commenter supported the permit requirement for visual examinations by indicating that visual examinations accompanied by facility-specific BMPs should most adequately address the minimal potential for controlling the contamination of storm water discharges at textile mill facilities. However, another commenter questions the usefulness of visual examinations, stating that EPA provides no justifications for such examinations.

In response, periodic inspections of controls are a requirement of the pollution prevention plan, and visual storm water runoff examinations and inspections should be treated as two distinct requirements. Visual examinations represent a minimum requirement in the assessment of the storm water discharge. The relative economic impact of the visual examination of the storm water should be minimal and, in conjunction with site specific BMPs can be used to evaluate the performance and effectiveness of best management practices employed at a particular facility. Visual examinations have been reduced to a quarterly frequency in the