

final permit. For more information on visual examinations see the monitoring section of this summary.

In response to the Agency's request for comments regarding proposed alternative monitoring requirements, one commenter contends that it does not believe that the annual or semiannual monitoring and reporting requirements put forth by the Agency are necessary or appropriate. In assessing this comment, it should again be noted that the Agency had only requested comments on the possibility of imposing the proposed alternative monitoring requirements on textile facilities.

Today's permit does not include the proposed alternative monitoring requirements. Based on the revised methodology for determining monitoring requirements at the industry sub-sector level, the textile industry is no longer required to conduct chemical monitoring for any specific pollutant. Due to the nature of the industry, and the fact that most operations at such facilities are conducted indoors, the contact of storm water with most pollutants typical of this industry are minimized or eliminated. The statistical analysis performed by the Agency using the Part 2 sampling data when conducted at the sub-sector level supports this conclusion.

Wood and Metal Furniture and Fixtures

Only six comments were submitted addressing the wood and metal furniture and fixtures manufacturing industry. Each of the comments supported the proposed monitoring conditions, which only requires quarterly visual examinations of storm water discharges. In today's final permit, this requirement remains unchanged. Analytical monitoring of storm water discharges will not be necessary from wood and metal furniture and fixtures manufacturing facilities, unless there are co-located activities, such as coal piles, refuse piles, landfills etc., which may be required to monitor under provisions elsewhere in the permit.

Rubber, Plastic, and Miscellaneous Products

The majority of the comments received on Sector Y, Rubber, Plastic Products, and miscellaneous manufacturing industries, pertained to the proposed monitoring requirements and the inspection and recordkeeping requirements of the permit. In addition, comments were received regarding EPA's description of the pollutant sources and the assessment of the monitoring results submitted with the

group applications. The Rubber Manufacturers Association (RMA) supported the specific BMP requirements which were proposed to control zinc in storm water discharges from rubber manufacturing facilities. Concern was also expressed regarding the consolidation of group applications into the 29 industrial sectors. The proposed permit only required visual examinations of storm water samples for facilities in this sector, rather than chemical testing which was proposed for 17 of the 29 sectors. While commenters supported the absence of analytical testing requirements, they also argued that the frequency (quarterly) for the visual examinations was excessive. Commenters also opposed the proposed alternate monitoring requirements which would have required analytical testing for certain parameters.

In the final permit, EPA modified the methodology for determining the types of facilities which are required to conduct analytical testing of storm water. The revised methodology is discussed in section VI.E of the final fact sheet and also in the monitoring portion of this summary. EPA believes that the sub-sector methodology better targets the monitoring requirements toward the specific types of facilities within the 29 sectors which pose the greatest risk to the storm water quality.

Based on the sub-sector methodology, the final permit requires that manufacturers of rubber products conduct analytical testing of storm water samples for zinc. This pollutant was shown to be a pollutant of concern from the monitoring data which were submitted by rubber products manufacturers (i.e., the median concentration was above the EPA benchmark concentration of 0.065 mg/l for zinc). Testing of grab samples is required quarterly during the second and fourth years of the permit. However, permittees may omit the testing during the fourth year if the second year results are below the benchmark concentration. In addition, the final permit provides for "alternate certification" in lieu of monitoring (see section VI.E.3 of the fact sheet) on a pollutant-by-pollutant basis as well as on an outfall-by-outfall basis. As such, analytical testing for zinc would not be required for facilities which do not use zinc, or for facilities where industrial activities are not exposed to storm water.

The final permit only requires analytical testing of storm water samples for rubber products manufacturers. However, the final permit does retain the requirement for a quarterly visual examination for all

facilities (including rubber manufacturers) in this sector. This requirement is also standard for all sectors of the permit. EPA believes that the quarterly frequency appropriately balances the costs associated with the visual examinations with the need to periodically assess any pollutant loadings in the discharges and the effectiveness of the storm water pollution prevention plan.

A commenter in this sector also expressed concern that analytical testing for a number of parameters in storm water had been a requirement of EPA's baseline general permit of September 9, 1992 for facilities in major SIC group 30. EPA recognizes that there are differences in the requirements between today's multi-sector general permit and the previous baseline general permit. These differences are the result of the additional information concerning these facilities obtained during the group application process. However, concerns regarding the requirements of the baseline general permit are outside the scope of the present permitting action.

The proposed permit would have required a comprehensive site compliance evaluation at "appropriate" intervals, but not less than once per year. A commenter argued that this was too vague and should be clarified. In response, the final permit now simply requires a comprehensive site compliance evaluation at a minimum of once per year for all facilities covered by the permit.

The commenter was also unclear regarding the "qualified" personnel who are required to conduct the comprehensive site compliance evaluations. In discussing the requirements for a comprehensive site compliance evaluation, section VI.C.4 of the fact sheet notes that inspectors should be members of the pollution prevention team. Such individuals should be familiar with the potential pollutant sources at the facility, and the control measures developed for the storm water pollution prevention plan to control pollutant discharges. EPA believes that facilities should be able to identify appropriate individuals for the necessary site evaluations. The commenter also requested that the permit provide that the facility inspections (required by Part XI.Y.3.d of the permit) would be conducted at appropriate intervals as stated in the storm water pollution prevention plan. Such a requirement was included in the proposed permit and has been retained in the final permit. The commenter objected to the requirement that facilities maintain records of inspections and visual examinations.