

TABLE Z-4.—LIST OF BEST MANAGEMENT PRACTICES—Continued

| Activity | Best management practices |
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| Improper connections to storm sewers | Employee training. Inspection of tank foundations, connections, coatings, valves and piping systems. Comply with existing spill prevention, cleanup and countermeasure plans (SPCC plan) and State and Federal laws. Integrity testing by qualified professional. Plug all floor drains connected to sanitary or storm sewer. Perform smoke or dye testing to determine if interconnections exist between sanitary water system and storm sewer system. Update facility schematics to accurately reflect all plumbing connections. Install a safeguard against washwaters from processing areas entering the storm sewer unless permitted. |
| Waste Management | Train employees on proper disposal practices for all materials. Conduct waste reduction assessment—develop guidelines for the elimination of waste generation emissions. Institute industrial waste source reduction and recycling BMPs. Move waste management activities indoors (after safety concerns are addressed) and cover waste piles, dumpsters, hoppers, place on impermeable elevated surfaces. Prevent storm water runoff by curbing, building berms. Cover trucks & inspect for leaking wastes. Inspection of waste management areas for leaking containers, spills, damaged containers, uncovered waste piles, dumpsters, hoppers. Inspection of roof areas & outside equipment. Develop and maintain proper erosion control or site stabilization measures. Train employees on proper disposal practices for all materials. |

Sources: NPDES Storm Water Group Applications—Part 1.
 EPA, Office of Water. September 1992. "Storm Water Management for Industrial Activities—Developing Pollution Prevention Plans and Best Management Practices." EPA 832-R-92-006.
 EPA, Office of Research and Development. January 1993. "Investigation of Inappropriate Pollutant Entries into Storm Drainage Systems. A User's Guide." EPA/600/R-92/238.

4. Special Conditions

There are no additional requirements beyond those described in Part VI.B. of this fact sheet.

5. Storm Water Pollution Prevention Plan Requirements

All facilities covered by this section must prepare and implement a storm water pollution prevention plan. The establishment of a pollution prevention plan requirement reflects EPA's decision to allow operators of leather tanning facilities to select BMPs as the Best Available Technology/Best Control Technology (BAT/BCT) level of control for the storm water discharges covered by this section. The requirements included in pollution prevention plans provide a flexible framework for the development and implementation of site specific controls to minimize pollutants in storm water discharges.

EPA believes that pollution prevention is the most effective approach for controlling contaminated storm water discharges from leather tanning facilities. Pollution prevention plans allow the operator of a facility to select BMPs based on site-specific considerations such as facility size, climate, geographic location, the environmental setting of the facility, and volume and type of discharge generated. This flexibility is necessary because each facility will be unique in

that the source, type, and volume of contaminated surface water discharges will differ from site to site.

There are two major objectives to a pollution prevention plan (1) to identify sources of pollution potentially affecting the quality of storm water discharges associated with industrial activity from a facility; and (2) to describe and ensure implementation of practices to minimize and control pollutants in storm water discharges associated with industrial activity from a facility. Specific requirements for a pollution prevention plan for leather tanning facilities and facilities which make fertilizer solely from leather scraps and dust are described below.

a. Contents of the Plan. Storm water pollution prevention plans are intended to help leather tanners evaluate all potential pollution sources at a site, and assist in the selection and implementation of appropriate measures designed to prevent, or control the discharge of pollutants in storm water runoff. EPA has developed guidance entitled "Storm Water Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices," EPA, 1992 (EPA 832-R-92-006), to assist permittees in developing and implementing pollution prevention measures.

(1) Description of Potential Pollutant Sources. Each storm water pollution prevention plan must describe activities, materials, and physical features of the facility that may contribute to storm water runoff or, during periods of dry weather result in dry weather flows. This assessment of storm water pollution will support subsequent efforts to identify and set priorities for necessary changes in materials, materials management practices, or site features, as well as aid in the selection of appropriate structural and nonstructural control techniques. Plans must describe the following elements:

(a) Drainage—The plan must contain a map of the site that shows the pattern of storm water drainage, structural features that control pollutants in storm water runoff and process wastewater discharges, surface water bodies (including wetlands), places where significant materials are exposed to rainfall and runoff, and locations of major spills and leaks that occurred in the 3 years prior to the date of the submission of a Notice of Intent (NOI) to be covered under this permit. The map also must show areas where the following activities take place: fueling, vehicle and equipment maintenance and/or cleaning, loading and unloading, material storage (including tanks or other vessels used for liquid or waste