

storage), material processing, and waste disposal, haul roads, access roads, and rail spurs. In addition the site map must also identify the location of all outfalls covered under this permit. The facility must prepare an inventory of the types of discharges contained in each outfall. This inventory may be kept as an attachment to the site map.

*(b) Inventory of Exposed Materials*—Facility operators are required to carefully conduct an inspection of the site and related records to identify significant materials that are or may be exposed to storm water. The inventory must address materials that within 3 years prior to the date of the submission of a Notice of Intent (NOI) to be covered under this permit have been handled, stored, processed, treated, or disposed of in a manner to allow exposure to storm water. Findings of the inventory must be documented in detail in the pollution prevention plan. At a minimum, the plan must describe the method and location of onsite storage or disposal; practices used to minimize contact of materials with rainfall and runoff; existing structural and nonstructural controls that reduce pollutants in storm water runoff; existing structural controls that limit process wastewater discharges; and any treatment the runoff receives before it is discharged to surface waters or a separate storm sewer system. The description must be updated whenever there is a significant change in the types or amounts of materials, or material management practices, that may effect the exposure of materials to storm water.

*(c) Significant Spills and Leaks*—The plan must include a list of any significant spills and leaks of toxic or hazardous pollutants 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. Significant spills include, but are not limited to, releases of oil or hazardous substances in excess of quantities that are reportable under Section 311 of CWA (see 40 CFR 110.0 and 40 CFR 117.21) or Section 102 of CERCLA (see 40 CFR 302.4). Significant spill may also include releases of oil or hazardous substances that are not in excess of reporting requirements and release of materials that are not classified as oil or a hazardous substance. The list shall be updated as appropriate during the term of the permit.

*(d) Sampling Data*—Any existing data on the quality or quantity of storm water discharges from the facility must described in the plan. The description should include a discussion of the methods used to collect and analyze the

data. Sample collection points should be identified in the plan and shown on the site map.

*(e) Risk Identification and Summary of Potential Pollutant Sources*—The description of potential pollution sources culminates in a narrative assessment of the risk potential that sources of pollution pose to storm water quality. This assessment should clearly point to activities, materials, and physical features of the facility that have a reasonable potential to contribute significant amounts of pollutants to storm water. Any such activities, materials, or features must be addressed by the measures and controls subsequently described in the plan. In conducting the assessment, the operator of the facility must consider the following activities: loading and unloading operations; outdoor storage activities; outdoor processing activities; significant dust or particulate generating processes; and onsite waste disposal practices. The assessment must list any significant pollution sources at the site and identify the pollutant parameter or parameters (i.e., total suspended solids, biochemical oxygen demand, etc.) associated with each source.

*(2) Measures and Controls.* Under the description of measures and controls in the storm water pollution prevention plan requirements, this section proposes that all areas that may contribute pollutants to storm water discharges shall be maintained in a clean, orderly manner. This section also proposes that the following areas must be specifically addressed:

*(a) Areas to be Addressed.*

*(i) Storage Areas for Raw, Semiprocessed, or Finished Tannery By-products*—Pallets and/or bales of raw, semiprocessed, or finished tannery by-products (e.g., splits, trimmings, shavings, etc.) that are stored where there is potential storm water contact, must be stored indoors or protected by polyethylene wrapping, tarpaulins, roofed storage area or other suitable means. Materials should be placed on an impermeable surface, the area should be enclosed or bermed or other equivalent measures should be employed to prevent runoff or runoff of storm water.

*(ii) Material Storage Areas*—Label storage units of all materials (e.g., specific chemicals, hazardous materials, spent solvents, waste materials). Maintain such containers and units in good condition. Describe measures that prevent or minimize contact with storm water. The facility must consider indoor storage and/or installation of berming and diking around the area to prevent runoff or runoff of storm water.

*(iii) Buffing/Shaving Areas*—The plan must describe measures that prevent or minimize contamination of the storm water runoff with leather dust from buffing/shaving areas. The facility may consider dust collection enclosures, preventive inspection/maintenance programs or other appropriate preventive measures.

*(iv) Receiving, Loading, and Storage Areas*—The plan must describe measures that prevent or minimize contamination of the storm water runoff from receiving, unloading, and storage areas. Exposed receiving, unloading and storage areas for hides and chemical supplies should be protected by a suitable cover, diversion of drainage to the process sewer, directing rain gutters away from loading/receiving areas, grade berming or curbing area to prevent runoff of storm water or other appropriate preventive measures.

*(v) Outdoor Storage of Contaminated Equipment*—The plan must describe measures that minimize contact of storm water with contaminated equipment. Equipment should be protected by suitable cover, diversion of drainage to the process sewer, thorough cleaning prior to storage or other appropriate preventive measures.

*(vi) Waste Management*—The plan must describe measures that prevent or minimize contamination of the storm water runoff from waste storage areas. The facility may consider inspection/maintenance programs for leaking containers or spills, covering dumpsters, moving waste management activities indoors, covering waste piles with temporary covering material such as tarpaulin or polyethylene, and minimizing storm water runoff by enclosing the area or building berms around the area.

*(vii) Vehicle Maintenance and Fueling*—Permittees must follow all applicable requirements described in Part XI.P. for controlling storm water discharges from vehicle maintenance and refueling areas.

*(viii) Improper Connections to Storm Sewers*—The plan must describe measures which prevent and prohibit washwaters from processing areas from entering storm sewers. The facility must install safeguards against wash waters entering storm sewers and train employees on proper disposal practices for disposal of all process waste materials.

These areas are sources of pollutants in storm water from leather tanning facilities. EPA believes that the incorporation of BMPs such as those suggested, in conjunction with the pollution prevention plan, will substantially reduce the potential of