

NPDES permits. Also, it may be more efficient to document some of the information on a key to the map or in a separate attachment. This would make the map easier to read and avoid the problem of clutter.

Today's permit requires permittees to indicate, on the site map, the location of all outfalls covered under the final permit. In addition, the facility must prepare an inventory of the types of discharges contained in each outfall (e.g., storm water and air conditioner condensate). This inventory, however, may be kept as an attachment to the site map. Basic information on the discharge points that are to be covered under the permit should be readily accessible. EPA believes that denoting the location of the outfalls is important to the permittee and will assist in determining potential pollutant sources for each outfall. EPA believes the benefit of doing so outweighs the problems pointed out by the commenters.

Inventory of Significant Materials and Significant Spills and Leaks Within the Past Three Years

The proposed multi-sector permit required that facilities prepare an inventory of significant materials that are or have been exposed to storm water discharges within the past three years. Facilities were also required to provide a list of significant spills and/or leaks within the past three years. Both these items must be included within the storm water pollution prevention plan with a description of the BMPs used to prevent exposure of such leaks or spills to storm water discharges.

Commenters stated that such inventories would be burdensome to compile. Commenters felt that facilities would not have this information readily available, especially recently acquired facilities. In lieu of preparing the inventories to cover activities within the past three years, commenters wanted inventories to be prepared from the effective date of the permit.

Residuals from the leaks and spills may be a major source of contamination of storm water discharges. EPA believes that it is important for facilities to develop inventories of significant materials and past significant spills and leaks. These inventories will help facilities identify the areas where best management practices should be implemented and is an integral part of storm water pollution prevention. EPA believes that this information is available to facilities and can be readily compiled from existing records. EPA does not believe this requirement represents an undue burden upon the permittee. In addition, this requirement

is commonly included within other issued NPDES storm water permits, therefore EPA is retaining this requirement in the final multi-sector storm water general permit.

Employee Training Requirements

The proposed multi-sector permit requested comment on whether a minimum training frequency of once per year should be specified for all industry sectors. Employee training is an effective tool in prevention pollution of storm water discharges. Employees that have been taught the importance of the pollution prevention plan measures and controls are more likely to thoroughly implement and continually maintain them. The training program is required to be described within the facility's pollution prevention plan and is applicable to all employees (including contractor personnel where relevant). Typical topics to be addressed include good housekeeping, materials management, and spill response procedures.

Many commenters supported the annual training requirement offered by EPA and one commenter felt that the training requirements were too high. However, most comments indicated that the training requirements should be more flexible. For instance, training should be based on the industrial activity and the complexity of the storm water pollution prevention plan which will affect how often an employee training program is necessary. This flexibility will ensure that training occurs only when necessary and may lessen the burden on those facilities that find training to be too burdensome.

To provide additional flexibility as the commenters suggested, today's permit includes training requirements that are sector-specific depending upon the needs assessed for each industry sector. Sectors with industrial activities that have a significant potential for storm water contamination to occur for reasons such as; operator error, lack of understanding of the operation of storm water controls, the need for frequent routine maintenance, the frequent changing of processes conducted outdoors, etc., will warrant some frequency of training. These types of facilities must conduct employee training at appropriate intervals which they determine necessary based upon these factors and others such as the number of employees, the complexity and types of pollution prevention measures and the rate of employee turnover.

Guidance for Storm Water Pollution Prevention Plan Development

Several commenters requested guidance on how to develop storm water pollution prevention plans and how to educate employees on storm water pollution prevention plan implementation. This information has already been prepared by EPA and is readily available. EPA published a guidance manual for storm water pollution prevention plan development and implementation in September 1992. The guidance manual, *Storm Water Management for Industrial Activities, Developing Pollution Prevention Plans and Best Management Practices* (EPA 832/R-92-006), was written to provide guidance for those facilities covered under the baseline general permit. However, the storm water pollution prevention plan requirements are similar and the manual is applicable for those who will be covered under the multi-sector permit. EPA also prepared a companion guidance document for construction activities, entitled *Storm Water Management for Construction Activities, Developing Pollution Prevention Plans and Best Management Practices* (EPA 832/R-92-005). This document is also available from EPA.

Monitoring Requirements

Benchmarks

The proposed multi-sector permit describes "pollutant benchmark values" (See Table 7, 58 FR 61169) which were used by EPA to determine the analytical monitoring conditions in the proposed permit. The benchmarks are also to be used by permittees who are required to conduct monitoring for comparison to determine if they qualify for the low concentration waiver. The standards are based primarily upon EPA Recommended Ambient Water Quality Criteria (Gold Book) values for toxic pollutants, and certain others, and NURP median concentrations for most conventional pollutants.

The benchmark values were used in two ways in the proposed permit. First, they were used as a standard of comparison against the median industry concentration for each pollutant that was sampled during the application process. If a median pollutant concentration in the sampling data for an industry sector was above the benchmark values it was considered a pollutant of concern for the industry sector. Under the proposed permit, when five or more median pollutant concentrations were higher than the benchmark values, the industry sector was required to perform analytical