

**Total Toxic Organics (TTO) Certification Policy
&
Toxic Organic Management Plan (TOMP) Preparation Guide**

**Industrial Pretreatment Program
Division of Wastewater Treatment
City of Dayton**

An industrial user regulated under the Electroplating, or Metal Finishing, or Electrical and Electronic Components Category may, in lieu of monitoring for Total Toxic Organics (TTO), certify that concentrated toxic organics were not discharged during the reporting period. This document outlines the procedure to be followed when certifying for TTO and provides guidance for the preparation of a Toxic Organic Management Plan (TOMP).

TOTAL TOXIC ORGANICS CERTIFICATION POLICY

In order to qualify for the TTO certification option in lieu of monitoring, the industrial user must meet the following conditions:

- The industrial user's wastewater discharge must be regulated under 40CFR part 413, or 433, or 469. *Other categorical pretreatment standards that contain TTO limits, do not allow the option of certifying in lieu of monitoring.*
- A baseline analysis of all wastestreams, which may contain toxic organic chemicals, must show compliance with the appropriate standards. The electroplating (413) and metal finishing (433) industrial users may, upon City of Dayton approval, sample and analyze for only those toxic organics that are used and or stored at their facility when performing baseline analysis. The electrical and electronic components industrial user (469) must sample and analyze for all toxic organics applicable to that category when performing baseline analysis.
- Sampling and analysis shall be performed in accordance with the techniques prescribed in 40 CFR part 136 and amendments thereto. Where 40 CFR part 136 does not contain sampling or analytical techniques for the pollutant in question, or where part 136 sampling and analytical techniques are inappropriate for the pollutant in question, sampling and analysis shall be performed by using analytical methods or other applicable sampling and analytical procedures approved by the City of Dayton.
- An effective TOMP must be developed by the industrial user, then submitted to and approved by the City of Dayton. The approved TOMP must be implemented before the industrial user may certify in lieu of monitoring. Continued implementation of the TOMP must be demonstrated during annual inspections. *Until the TOMP is approved and implemented, the industrial user must monitor for and report TTO according to requirements contained in their "Administrative Order for Industrial Wastewater Discharge".*
- Once the approved TOMP has been implemented by the industrial user, in order to certify in lieu of monitoring, the following certification statement on the Periodic Report on Continued Compliance form, must be signed by an Authorized Representative of the company. This must be done each time self-monitoring reporting is required, according to the "Administrative Order for Industrial Wastewater Discharge" of the industrial user.

"Based on my inquiry of the person or persons directly responsible for managing compliance with the standards for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastestream has occurred since filing the last Periodic Report on Continued Compliance. I further certify that this facility is implementing the current

Toxic Organic Management Plan which is on file with the City of Dayton, Division of Wastewater Treatment.”

- If any production process is modified, or if conditions change that effect the use and or storage of toxic organics, the City of Dayton, Division of Wastewater Treatment must be notified and the TOMP modified and re-submitted for approval. Analytical results from City of Dayton sampling for TTO may be used for this purpose, but the City of Dayton reserves the right to require the industrial user to sample and analyze for TTO.

TOXIC ORGANIC MANAGEMENT PLAN GUIDE
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The City of Dayton requires that the Toxic Organic Management Plan (TOMP) be submitted whether certifying in lieu of monitoring for TTO or not. The City must then review and approve the TOMP before the industrial user may certify in lieu of monitoring. Until the TOMP is approved and implemented, the Industrial User must sample and analyze for TTO, and report those results to the City.

The TOMP is not intended to supersede any local, state, or federal regulation. Many of the TOMP requirements may already be required for other regulations, especially RCRA (40 CFR 262, 264, and 265) and the “Emergency Planning and Community Right-to-Know Act”, Title III of the Superfund Amendments and Reauthorization Act (SARA). The TOMP objective is to provide assurance that toxic organics are properly used and disposed of instead of being discharged to the sewers.

An industrial user regulated under the Electroplating, or Metal Finishing, or Electrical and Electronic Components Category **must thoroughly address all of the following steps in completing the TOMP.** **If Step #1**, “Toxic Organics Inventory” reveals that your facility does not use or store toxic organic compounds or compounds containing such toxic organics, as regulated by the applicable categorical pretreatment standard, then you may proceed to the last page of the form.

STEP #1 - Toxic Organics Inventory

- A.** Identify and list all toxic organic chemicals used at your facility. Estimate the maximum daily amount and the average daily amount of toxic organics stored at your facility. For a list of regulated toxic organics consult the following appropriate source:
- Electroplating 40CFR 413, §413.02 (i), or OAC, 3745-3-11 (D)(6)
 - Metal Finishing 40CFR 433, §433.11 (e), or OAC, 3745-3-12 (E)(5)
 - Electrical and Electronic Components 40CFR 469, §469.12 (a), or OAC, 3745-3-10 (E)(2), (F)(2)
- B. Trade names will not be accepted;** consult material safety data sheets and/or technical bulletins for the organic constituents. Do not attach material safety data sheets or technical bulletins in lieu of listing the organic constituents, unless specifically requested by the City of Dayton.
- C.** If no toxic organic compounds or compounds containing such toxic organics are identified as being used or stored at your facility, then you may proceed to Step # 7. If any toxic organic compounds or compounds containing such toxic organics are identified as being used or stored at your facility, then you must complete Steps # 2 through # 6.

STEP #2 - Identify and Approximate the Quantities of TTO in the Wastestream

- A. Wastestreams must be sampled and analyzed using USEPA approved methods, see 40CFR 136. Sampling and analyses should be conducted for only those individual compounds reasonably expected to be present in the wastestream. The City of Dayton shall be provided with a copy of the reporting form from the laboratory analyzing the wastestream samples. Results from City monitoring may be used to fulfill this requirement.
- B. Describe the step(s) in the regulated process in which toxic organics are used.
- C. Describe the sources where toxic organics may be introduced into the wastestream besides B. above (i.e., floor drains).
- D. Provide a flow schematic showing all of the sources where toxic organics may enter the wastestream.
- E. List the approximate quantities (i.e., gallons/day) of each toxic organic chemical used at each step in the regulated process.
- F. Evaluate any regulated TTO found in the effluent, but not on the TTO inventory list in part A and determine if they are formed as reaction products or by-products, raw materials impurities, equipment corrosion, or other sources.

STEP #3 - Methods of Disposal

- A. Describe the waste(s) being generated.
- B. Provide the amount of waste being disposed of, and the frequency of disposal.
- C. Provide the method(s) of disposal (i.e., surface impoundment, direct discharge, reclamation, or contract disposal).
- D. Provide the name of the contractor(s) or the receiving stream.
- E. Estimate the maximum daily amount and the average daily amount of waste stored at your facility.
- F. Provide your facility's RCRA generator number.
- G. Describe the storage of waste generated awaiting disposal. This should include, but is not limited to, location of storage (preferably indoors or a roofed area), the duration of storage, and the types of waste being stored (includes solvent soaked rags and absorbents/adsorbents). The storage area must be designed and maintained to not allow leakage. Incompatible wastes should not be stored together.
- H. Evaporation of waste is not an acceptable disposal method. All waste containers should be covered.
- I. Evaluate control options that could be implemented to minimize or eliminate the discharge of toxic organics or the source or potential source where toxic organics are introduced to the treatment system. These include but, are not limited to, the following:
 - in-plant modification
 - solvent / chemical substitution
 - partial or complete recycle
 - neutralization
 - operational changes

STEP #4 - Practices to Insure that Spills or Leaks do not Routinely Occur

- A.** Describe the practices to be followed, including housekeeping procedures, during the use, collection, and storage of organics to insure that organics do not spill or leak. These practices should include, but are not limited to:
- properly labeling and handling toxic organic containers,
 - storing a minimal amount of organics at the site,
 - a centralized storage area (preferably indoors or a roofed area) designed and maintained not to allow leakage,
 - sealing floor drains when they are in the area where toxic organics are used or stored,
 - overflow control equipment, and
 - containment system (sump or dike) capable of holding 10% of the total volume stored or the volume of the largest container, which ever is greater. The containment system must be designed and maintained not to allow leakage.
- B.** Describe the procedures that will provide routine and detailed visual inspections to insure the absence of leaking storage containers (i.e., tanks, drums, pipes, etc.). The City of Dayton recommends visual inspections at least once a week.
- C.** Describe how all employees are trained in the proper use, collection, and storage of all chemicals with which they work.
- D.** Describe the procedures by which employees are informed of the health risks associated with exposure to the toxic organic chemicals with which they work.
- E.** Provide a simple but complete floor plan showing the storage location of toxic organics prior to use and toxic organics waste awaiting disposal.

STEP #5 - Spill or Leak Procedures

- A.** Notifications procedures
1. A list of agencies to be contacted with their telephone numbers must be posted where organics are used and stored. This list includes, but is not limited to, your facility's emergency response coordinator, the Ohio EPA district office, and the City of Dayton, Division of Wastewater Treatment.
 2. If a spill or leak enters the wastewater, the City of Dayton, Division of Wastewater Treatment, and Ohio EPA district pretreatment unit should be promptly notified with the following information:
 - a. your facility's name
 - b. the receiving POTW (City of Dayton, Wastewater Treatment Plant)
 - c. the chemical(s) and the cause of the spill/leak
 - d. quantity of the chemical(s)
 - e. time and duration of spill/leak
 - f. steps being taken and/or planned to eliminate and prevent any further spill/leaks.
- B.** Describe the practices to be followed in the event of a spill or leak (i.e., containment, treatment, disposal, etc.).
- C.** Describe the equipment / supplies on site to contain a rupture in the largest container.
- D.** Describe how employees will be trained in the procedures to follow in the event of a spill or leak of a toxic organic.

STEP #6 – Certification Statement for Facilities Using or Storing Total Toxic Organics

“Based on my inquiry of the person or persons directly responsible for managing compliance with the standards for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastestream has occurred since filing the last Periodic Report on Continued Compliance. I further certify that this facility is implementing the current Toxic Organic Management Plan which is on file with the City of Dayton, Division of Wastewater Treatment.”

Signature of Authorized Representative

Date

Authorized Representative Name (print or type)

Title

STEP #7 - Certification Statement for Facilities Not Using or Storing Total Toxic Organics

“I certify that toxic organic compounds or compounds containing such toxic organics, as regulated by an applicable categorical pretreatment standard, are not used or stored at this facility. If any production process is modified, or if conditions change that effect the use and or storage of toxic organics, I will notify the City of Dayton, Division of Wastewater Treatment.”

Signature of Authorized Representative

Date

Authorized Representative Name (print or type)

Title