

## Toxic Organic Management Plan

Facilities that perform any of the following categorical processes are regulated under the 40 CFR Pretreatment requirements concerning Total Toxic Organics (TTO): Electroplating, Metal Finishing, Electrical & Electrical Components, Copper Forming, Aluminum Forming, and Coil Coating (can-making subcategory).

The requirements include sampling for those TTO compounds which would reasonably be expected to be present and the submission and implementation of a Toxic Organic Management Plan (TOMP) in order to reduce or eliminate the discharge of organics and to meet the categorical permit limit as is applicable to the sector. The permit limit is included as a part of the facilities Industrial Wastewater Discharge Permit. Facilities must either sample annually for TTO or must submit a TOMP for approval to reduce monitoring.

The following information is required to be included in the TOMP.

1. Complete inventory of all Toxic organic compounds in the regulated process.
2. Description of how the compounds are used in the regulated process.
3. Estimated on how much of the compound is used per item manufactured (e.g. lbs, SF, each item) and an estimate of how much is discharged.
4. Description of the method of disposal used for each compound (e.g. reclamation, contract hauling or incineration).
5. Explain the control measures used to ensure that compounds do not spill, leak, or otherwise contaminate the wastewater discharge to the sanitary sewer collection system (e.g. pretreatment, chemical storage, employee training).
6. List what type of inspections are performed, the frequency and by whom.
7. Reporting procedures in the event of an accidental leak or spill of organics.
8. Submission of the TOMP includes a certification statement signed by an authorized representative responsible for the overall plant operations.

“Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the control authority.”