



St. Joseph, Missouri - Water Protection Division
Industrial Pretreatment Program
Guidelines for the preparation of a Toxic Organic Management Plan
(TOMP)



1. Background and Regulatory Information

One alternative to routine Total Toxic Organic (TTO) monitoring is the preparation of a Toxic Organic Management Plan (TOMP). This option is available to regulated industrial users in the Electroplating (40 CFR §413), Metal Finishing (40 CFR §433) and Electrical and Electronic Components (40 CFR §469) categories.

A TOMP must specify the toxic organic compounds used, the method of disposal used (instead of discharge into wastestreams) and procedures for assuring that toxic organics do not routinely spill or leak into wastewater discharged to the City of St. Joseph's Publicly Owned Treatment Works (POTW). The following is a guide to aid Industrial User's (IU) when developing a TOMP.

2. Process Engineering Analysis

A process engineering analysis should be conducted to determine the source and type of toxic organic compounds found in this facility's wastewater, as well as those that could reasonably be expected to enter the waste stream in the event of spills, leaks, etc., based on the type of operations conducted at this facility. The process engineering analysis should include:

- A. An examination of published reports on the specific industry;
- B. A water flow diagram to identify all possible wastewater sources;
- C. A list of raw materials used in the industrial processes, including chemical additives, water treatment chemicals and cleaning agents, and the wastewater stream that each regulated toxic organic could potentially enter;
- D. Comparison of the toxic organic compounds found in the effluent with the list of raw materials and the location of the most probable wastewater source;
- E. Evaluation of the toxic organic compounds found in the effluent, but NOT found on the raw materials list and determination of those formed as reaction products or by-products;
- F. Examination of sources such as equipment corrosion, raw materials, impurities, etc., that could result in the release of toxic organic compounds to the sewer system.

3. Pollution Control Evaluation

An evaluation should be made of the control options that could be implemented to eliminate the source or potential source of toxic organic compound(s) introduced into the sewer system. This may include in-plant modifications, operational changes, solvent or chemical substitution, partial or complete recycle, reuse, and neutralization. Evaluation of the available control options may lead to a decision, if available, of whether a TOMP is a feasible alternative to TTO monitoring.



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4. Preparation of the TOMP

A TOMP should address:

- A. The location of sources(s) of pollutant(s);
- B. Control options explored;
- C. Effectiveness of control options in meeting effluent limits;
- D. The permittee's choice of options and the projected schedule for achieving necessary control.

At a minimum, the TOMP must include the following items:

- A. A complete inventory of all toxic organic chemicals in use or identified through sampling and analysis of the wastewater from each regulated process (organic constituents of trade-name products should be obtained from the appropriate suppliers as necessary).
- B. The methods of disposal used for the inventoried compounds, such as reclamation, contract hauling, or incineration.
- C. The procedures for assuring that the regulated toxic organic compounds do not spill or routinely leak into the sewer system via floor drains, cooling tower discharges (contact and non-contact), boiler blow downs, etc., or any other location which allows discharge of the compounds.
- D. Determinations or best estimates of the identities and approximate quantities of toxic organic compounds used, as well as discharged from the regulated manufacturing processes. Compounds present in the waste stream(s) that are discharged to the sewer system may be a result of regulated processes or disposal, spills, leaks, rinse water carry over, air pollution control and other sources.



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5. Submission of the TOMP and Certification Statement

An IU may submit a TOMP at any time and request that TTO monitoring requirements be discontinued upon Water Protection's approval and implementation of the TOMP. A prerequisite for use of this certification approach is a fully approved, implemented, and ongoing TOMP. An authorized representative of the company must make the following certification statement at the time of submission of the TOMP and with ALL periodic compliance reports:

"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."

Date

Signature

If the User is unable to make the above certification statement, the User shall notify Water Protection sixty (60) days prior to the due date for filing the periodic compliance reports. At that time, Water Protection should determine the appropriateness of requiring sampling and analysis for the specific toxic organic compounds and notify the User accordingly.

6. Reference

For more industry specific information including reporting, requirements, the TOMP, and monitoring for TTO's please see the United States Environmental Protection Agency's "Guidance Manual for Implementing Total Toxic Organics (TTO) Pretreatment Standards, September 1985."