

Notice: Reprint of Corrected Article

The article "Completing the Total Toxic Organic Forms" first appeared in the Spring 2002 newsletter. Unfortunately it contained a typo that altered the meaning of a sentence, and may confuse readers about the guidance given.

The article is being reprinted here in its correct version. Please disregard the earlier version of the article. We apologize for any inconvenience.

Completing the Total Toxic Organic Forms

The Fall 2001 newsletter included an article on filling out your Self-Monitoring Report (SMR) form. This article covers filling out your Total Toxic Organic (TTO) forms properly, as well as related issues.

Applicability

This article applies only to permitted Industrial Users who have TTO reporting requirements. Please examine page 6 of your permit for a mark under the TTO "Testing and Certification Requirements." If that area is not marked by an "x" then there are no requirements. If in doubt, ask your inspector.

Which certification form?

There are two different TTO certifications.

One certification form states, "*Based on my inquiry...this facility does not store, use or dis-*

charge..." this is the form to submit if you have no TTOs on-site.

The other form states, "*Based on my inquiry...no controlled toxic organics are discharged...*" this is the form to use if you store or use TTOs. You must also submit Organic Solvent Worksheets in your SMR submittal to account for TTOs stored, used and disposed of.

Your permit will state which certification form you should submit on page 6, as well as the testing requirements for TTOs, if any. Your TTO permit requirements are based on information submitted at the time the permit was last renewed or amended.

If you had no TTOs on-site previously but have some now (or vice versa), promptly inform your inspector in writing to maintain compliance with permit conditions and discharge regulations.

What must I report in the Organic Solvent Worksheet?

(Applicable only if you have TTOs on-site.)

Your inspector can provide you with a list of the TTOs that apply to your facility if you aren't sure. The TTO list is different for each federal category, and is specific about which chemical compounds must be reported. Submit one worksheet for each TTO used at your facility.

Only chemicals on the TTO list applicable to your facility must be reported. Use of Acetone and Isopropyl alcohol (IPA) never needs to be reported in the worksheets, nor do chemicals with similar structures to listed chemicals even if different by only one atom. You still must report all chemistry usage in permit applications and related documentation, however.

We hope you will find this article helpful. If you have any questions on your TTO requirements please contact your inspector.

TTO QUICK TIPS

- **Do NOT send in both certification forms with your SMR; they contradict each other!**
- **If you must submit an Organic Solvent Worksheet, submit one for each TTO used at your facility.**
- **All signatory requirements for your SMR apply to the TTO certification forms. See pages 11-12 of your permit.**
- **Copies of the TTO forms can be found at: <http://www.ci.san-jose.ca.us/esd/eeforms.htm>**

