Toxic Organic Management Plan Guidelines

Industrial Users that Store, Use, or Generate Toxic Organic Compounds:

Refer to:

Attachment 1

(Page 2)

Industrial Users that **DO NOT** Store, Use, or Generate Toxic Organic Compounds:

Refer to:

Attachment 2

(Page 7)

The Federal pretreatment standards for Metal Finishing (40 CFR 433) and Electrical and Electronic Components (40 CFR 469) require Industrial Users to either (1) Perform self-monitoring of their wastewater for Total Toxic Organics (TTOs) or (2) Develop, implement, and maintain a Toxic organic Management Plan (TOMP) and submit a certification statement with each self-monitoring report that TTOs are not discharged.

How Do I Qualify to Certify in Lieu of TTO Monitoring?

A TOMP, once approved by the City of San José, allows your business to certify in lieu of performing routine TTO monitoring. Your business will be responsible for maintaining all items indicated in your TOMP, ensuring that toxic organic compounds are not discharged to the San José-Santa Clara Regional Wastewater Facility.

How Do I Prepare a Toxic Organic Management Plan?

These guidelines for preparing a TOMP have been adopted from the Environmental Protection Agency (EPA) Guidance Manual for Implementing TTO Pretreatment Standards. The TOMP includes 5 basic sections:

Section I: List of Toxic Organics
Section II: Process Engineering Analysis
Section III: Pollutant Control Evaluation
Section IV: Toxic Organics Management Program
Section V: Certification Statements

My Business Does Not Use Any TTOs, Should I Have a Toxic Organic Management Plan?

Even Industrial Users that do not store, use, or generate toxic organic compounds must monitor for TTOs if they do not have an approved TOMP on file. If your site meets this criteria, you may submit a simplified TOMP (See Attachment 2). It is beneficial for all users with TTO monitoring requirements to submit a TOMP for approval, because once approved, it allows certification in lieu of performing routine TTO monitoring.

What if I Have Added or Removed TTOs from my Business?

In the case of changes in the toxic organic compounds stored, used, or generated at your business, notify your Source Control Inspector. You may need to submit an updated Toxic Organic Management Plan for approval.

San José-Santa Clara Regional Wastewater Facility

CITY OF SAN JOSE
CAPITAL OF SILICON VALLEY

Environmental Services

www.sanjoseca.gov/pretreatment

For additional help, please contact your Source Control Inspector at: **(408) 945-3000**.

0618/QXXX/EGAD/KZ/pn

Attachment 1

Toxic Organic Management Plan Guidance for Industrial Users that Store, Use, or Generate Toxic Organic Compounds

Include the following on your title page:

- Toxic Organic Management Plan
- Date
- Business Name
- Discharge Address
- Description of Operations
- Industrial Wastewater Discharge Permit Number

Include the following sections in your Toxic Organic Management Plan:

I. List Of Toxic Organic Compounds (EPA Priority Pollutants)

From the following list of Toxic Organic Compounds, check all those which are either used in your facility, generated at your facility, or are stored on the premises. Include a list of these toxic organics with your Toxic Organic Management Plan. If none apply, refer instead to Attachment 2.

- ☐ Acenaphthene
- ☐ Acrolein
- ☐ Acrylonitrile
- ☐ Aldrin
- ☐ Alpha-Endosulfan
- ☐ Anthracene
- ☐ Benzene
- ☐ Benzidine
- ☐ Benzo(a)pyrene (3,4-benzopyrene)
- ☐ Beta-Endosulfan
- ☐ Bis (2-chloroethoxy) methane
- ☐ Bis (2-chloroethyl) ether
- ☐ Bis (2-chloroisopropyl) ether
- ☐ Chlordane (technical mixture and metabolites)
- ☐ Chlorinated naphthalene
- ☐ Chloroalkyl ethers
- ☐ Chrysene
- ☐ Dieldrin
- ☐ Diphenylhydrazine
- ☐ Endosulfan sulfate
- ☐ Endrin
- ☐ Endrin aldehyde
- ☐ Ethylbenzene
- ☐ Fluoranthene
- ☐ Fluorene
- ☐ Gamma-BHC (lindane)
- ☐ Haloethers
- ☐ Heptachlor
- ☐ Hexachlorobutadiene
- ☐ Hexachlorocyclohexane
- ☐ Hexachlorocyclopentadiene
- ☐ Indeno(1,2,3-cd) pyrene (2,3-o-phenlene pyrene)
- ☐ Isophorone
- ☐ Naphthalene
- ☐ Nitrobenzene
- ☐ N-Nitrosodimethylamine
- ☐ N-Nitrosodi-n-propylamine
- ☐ N-nitrosodiphenylamine
- ☐ Parachlorometa cresol
- ☐ Phenanthrene
- ☐ Phenol
- ☐ Toluene
- ☐ Toxaphene
- ☐ 1,12-Benzoperylene (benzo(ghi)perylene)
- ☐ 1,2,5,6-Dibenzanthracene(dibenzo(a,h)anthracene)
- ☐ 1,2-Benzanthracene (benzo(a)anthracene)
- ☐ 1,2-Dichloropropane
- ☐ 1,3-Dichloropropene (1,3-Dichloropropylene)
- ☐ 11,12-Benzofluoranthene (benzo(k)fluoranthene)
- ☐ 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD)
- ☐ 2,4-dimethylphenol
- ☐ 2,4-Dinitrotoluene
- ☐ 2,6-Dinitrotoluene
- ☐ 2-Chloroethyl vinyl ether (mixed)
- ☐ 3,3-Dichlorobenzidine
- ☐ 3,4-Benzofluoranthene (benzo(b)fluoranthene)
- ☐ 4-Bromophenyl phenyl ether
- ☐ 4-Chlorophenyl phenyl ether

- ☐ Chlorobenzenes, including:
  - Hexachlorobenzene
  - 1,2-dichlorobenzene
  - 1,3-dichlorobenzene
  - 1,4-dichlorobenzene
  - 1,2,4-trichlorobenzene

- ☐ Chlorinated ethanes, including:
  - Chloroethane
  - Hexachloroethane
  - 1,1,1-trichloroethane (TCE)
  - 1,1,2,2-tetrachloroethane
  - 1,1,2-trichloroethane
  - 1,1-dichloroethane
  - 1,2-dichloroethane

- ☐ Chlorinated phenols, including:
  - Pentachlorophenol
  - 2-chlorophenol
  - 2,4,6-trichlorophenol
  - 2,4-dichlorophenol

- ☐ Chloroethylenes, including:
  - Tetrachloroethylene (PCE)
  - Trichloroethylene (TCE)
  - Vinyl Chloride (Chloroethylene)
  - 1,1-dichloroethylene
  - 1,2-trans-dichloroethylene

- ☐ Halomethanes, including:
  - Bromoform (Tribromomethane)
  - Carbon Tetrachloride (Tetrachloromethane)
  - Chlorodibromethane
  - Chloroform (Trichloromethane)
  - Dichlorobromomethane
  - Dichlorodifluoromethane
  - Methyl Bromide (Bromomethane)
  - Methyl Chloride (Chloromethane)
  - Methylene Chloride (Dichloromethane)

- ☐ Heptachlor epoxide (BHC-Hexachlorocyclohexane):
  - Alpha-BHC
  - Beta-BHC
  - Gamma-BHC (lindane)
  - Delta-BHC

- ☐ Nitrophenols, including:
  - 2,4-Dinitrophenol
  - 2-Nitrophenol
  - 4-Nitrophenol
  - 4,6-Dinitro-o-cresol

- ☐ Phthalate esters, including:
  - Bis(2-ethylhexyl) phthalate
  - Butyl benzyl phthalate
  - Diethyl phthalate
  - Dimethyl phthalate
  - Di-n-butyl phthalate
  - Di-n-octyl phthalate
  - 4,4-DDT
  - 4,4-DDD (p,p-TDE)
  - 4,4-DDE (p,p-DDX)

- ☐ Polychlorinated biphenyls (PCBs), including:
  - PCB-1016 (Aroclor 1016)
  - PCB-1221 (Aroclor 1021)
  - PCB-1232 (Aroclor 1232)
  - PCB-1242 (Aroclor 1242)
  - PCB-1248 (Aroclor 1248)
  - PCB-1254 (Aroclor 1254)
  - PCB-1260 (Aroclor 1260)

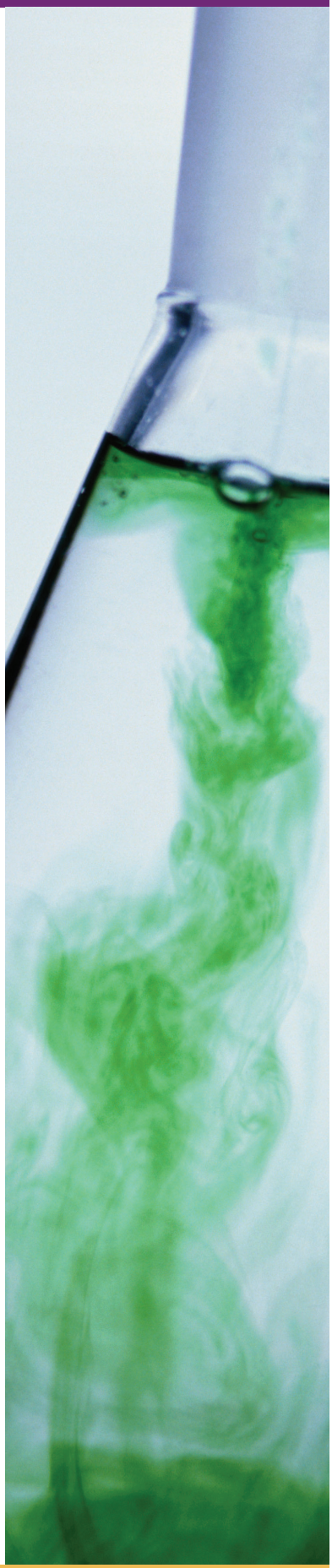
II. Process Engineering Analysis Description

The process engineering analysis should determine the source and type of toxic organic compounds found in your business' wastewater, including sources and compounds that could enter the wastewater in the event of spills, leaks, etc., based on the type of operations conducted. Such analysis should be based on one or more monitoring events or a review of historical wastewater effluent data for the toxic organic compounds which are required to be monitored under the applicable federal category(ies) (this monitoring can be fulfilled through the Baseline Monitoring Report [BMR], previous Self-Monitoring Reports [SMRs], or City monitoring data). The process engineering section should include:

1. A flow diagram to identify all possible wastewater sources;
2. A list of raw materials used in the industrial processes — including chemical additives and cleaning agents — and the wastewater stream(s) that toxic organic compounds could potentially enter;
3. A comparison of toxic organic compounds found in the effluent with the list of raw material origins and selection of the most probable wastewater sources;
4. An evaluation of toxic organic compounds found in the effluent, but not on the raw materials list and a determination of those formed as reaction products or by-products; and
5. An examination of sources such as equipment corrosion or raw material impurities that could result in release of toxic organic pollutants to wastewaters. For example, this could include supplier spec-sheets.

III. Pollutant Control Evaluation

Describe the evaluation of the control options that could be implemented to eliminate the toxic organic compound(s) or the potential source(s) of toxic organic compounds introduced to the treatment system. This may include facility modifications, solvent or chemical substitution, partial or complete recycle, reuse, neutralization, or operational changes. The analysis should be conducted on a case-by-case basis and may result in one or more feasible options to control each source or potential source of toxic pollutant discharge. Finally, evaluation of the available control options, including the advantages and disadvantages of each, may lead to a decision of whether a TOMP is a feasible alternative to TTO monitoring.



IV. Toxic Organic Compound Management Program

A. Toxic Organic Compound Used, Amount Purchased, and Amount Stored Onsite

Refer to the Federal List of Total Toxic Organic Compounds in your wastewater discharge permit and include in a table as shown below. List the type and estimated amount of toxic organic compounds purchased and used on a yearly basis and provide a brief description detailing the usage (toxic organic compounds in trade-name products should be provided).

Explain how purchasing practices will ensure that all new chemical compounds will be reviewed to determine the presence of regulated toxic organic compounds as listed on your wastewater discharge permit. If the chemical contains a regulated toxic organic compound, you must notify your Source Control Inspector and submit an updated Toxic Organic Management Plan for approval.

If applicable, notify customers not to send parts which may contain or be contaminated with regulated toxic organic compounds, etc.

Include a table with the headings shown below:

Name of Product and Toxic Organic Compound	Use of Toxic Organic Compound	Container Size and Type	Storage Location	Estimated Gallons Annually Purchased	Gallons Typically Stored On Site
Example Chemical: Toluene	Dissolving Polystyrene Material	2 Gallons HDPE	Flammable Materials Cabinet	15 Gallons	4 Gallons

B. Amount of Toxic Organic Compounds Disposed, Reclaimed, Consumed, or Evaporated Annually

Account for each toxic organic compound listed in Section A. Indicate the estimated volume of each of these compounds presently stored on site and the estimated volume disposed of annually by each method of disposal (e.g. hauled off-site, reclamation, consumption in final products, evaporation, or other).

Include a table with the headings shown below:

Name of Product and Toxic Organic Compound*	GALLONS DISPOSED, RECLAIMED, ETC. ANNUALLY				
	Shipped Off-site	Reclaimed On-site	Consumed or Retained In Product	Evaporated	Other (Indicate Disposal Method)
Example Chemical: Toluene	5 Gallons	N/A	5 Gallons	5 Gallons	N/A

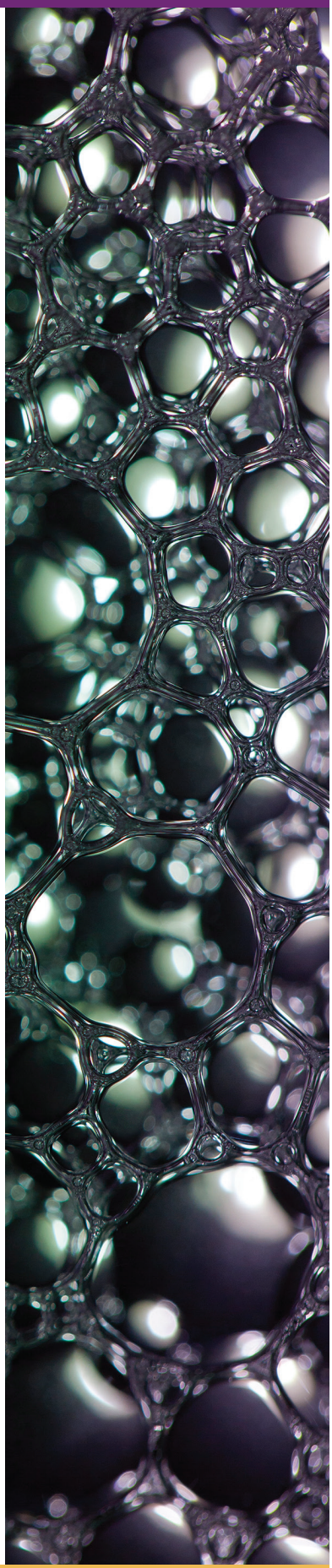
*** Include Descriptions of:**

1. Waste toxic organic compound container type, size, and labeling.
2. Collection methods and hazardous material hauling company used.

C. Toxic Organic Compound Process Operations

1. For each of the toxic organic compounds listed in Section A, provide a brief description of the process(es) in which that compound is used and describe in detail the work methods used to prevent and prohibit dragout, drips, and/or spills from entering wastewater discharged from your business. If the toxic organic compound is recycled or reused, describe this process as well.

2. If any toxic organic compounds listed in Section B are used in a process which discharges to the treatment system, provide a brief description detailing the procedure or process operation resulting in each discharge. Describe corresponding toxic organic compound concentrations and treatment technologies used.



D. Spill Control Procedures and Training

1. Describe the facility spill control, containment, segregation, and clean up procedures in effect for the toxic organic compounds on the premises. This would include measures taken in the toxic organic compound receiving area(s), storage area(s), transfer area(s), work area(s), and waste storage area(s) to prevent incidental and accidental spillage from entering the wastewater discharge (i.e., Spill Prevention and Chemical Management Plan or Spill Prevention, Control, and Countermeasures (SPCC) Plan). Measures to prevent and control spillage may include berms, sealed floor drains, absorbent material, etc.

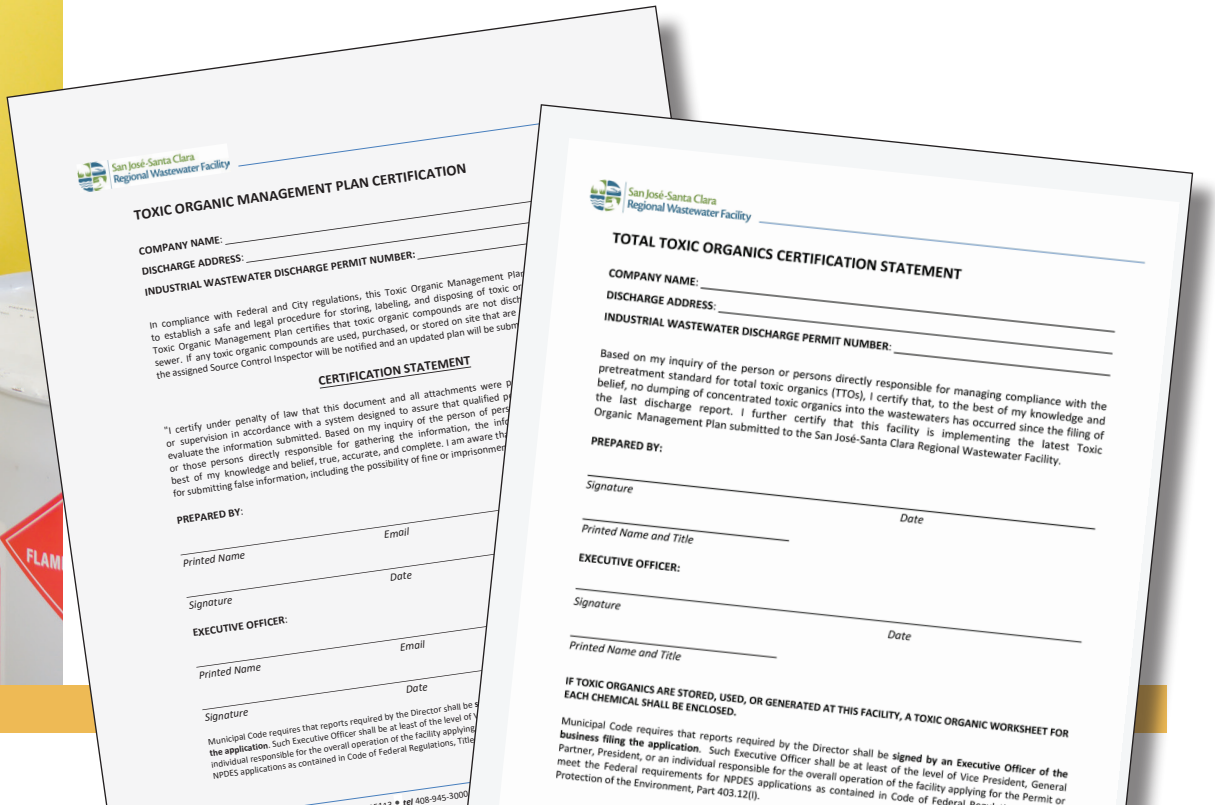
2. Describe the spill prevention and cleanup training for various employee classifications at the facility. Describe training topics conducted, frequencies, and record keeping of employees trained.

3. Indicate the volume of the largest vessel within each storage area and the capacity of the secondary containment area itself.

V. Certification Statements

A. Include the *Toxic Organic Management Plan Certification* with this submittal, which can be found at: www.sanjoseca.gov/pretreatmentforms.

B. A *Total Toxic Organics Certification Statement* and a *Toxic Organic Compound Worksheet* for each toxic organic chemical must be submitted with each Self Monitoring Report. These can be found at: www.sanjoseca.gov/pretreatmentforms.


San José-Santa Clara Regional Wastewater Facility

TOXIC ORGANIC MANAGEMENT PLAN CERTIFICATION

COMPANY NAME:

DISCHARGE ADDRESS:

INDUSTRIAL WASTEWATER DISCHARGE PERMIT NUMBER:

In compliance with Federal and City regulations, this Toxic Organic Management Plan to establish a safe and legal procedure for storing, labeling, and disposing of toxic or Toxic Organic Management Plan certifies that toxic organic compounds are not disch sewer. If any toxic organic compounds are used, purchased, or stored on site that are the assigned Source Control Inspector will be notified and an updated plan will be subm

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were p or supervision in accordance with a system designed to assure that qualified p evaluate the information submitted. Based on my inquiry of the person of pers or those persons directly responsible for gathering the information, the info best of my knowledge and belief, true, accurate, and complete. I am aware th for submitting false information, including the possibility of fine or imprisonme

PREPARED BY:

Printed Name Email

Signature Date

EXECUTIVE OFFICER:

Printed Name Email

Signature Date

Municipal Code requires that reports required by the Director shall be s the application. Such Executive Officer shall be at least of the level of V individual responsible for the overall operation of the facility applying NPDES applications as contained in Code of Federal Regulations, Title

San José-Santa Clara Regional Wastewater Facility

TOTAL TOXIC ORGANICS CERTIFICATION STATEMENT

COMPANY NAME:

DISCHARGE ADDRESS:

INDUSTRIAL WASTEWATER DISCHARGE PERMIT NUMBER:

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTOs), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since the filing of the last discharge report. I further certify that this facility is implementing the latest Toxic Organic Management Plan submitted to the San José-Santa Clara Regional Wastewater Facility.

PREPARED BY:

Signature Date

Printed Name and Title

EXECUTIVE OFFICER:

Signature Date

Printed Name and Title

IF TOXIC ORGANICS ARE STORED, USED, OR GENERATED AT THIS FACILITY, A TOXIC ORGANIC WORKSHEET FOR EACH CHEMICAL SHALL BE ENCLOSED.

Municipal Code requires that reports required by the Director shall be signed by an Executive Officer of the business filing the application. Such Executive Officer shall be at least of the level of Vice President, General Partner, President, or an individual responsible for the overall operation of the facility applying for the Permit or meet the Federal requirements for NPDES applications as contained in Code of Federal Regulations, Protection of the Environment, Part 403.12(l).

Attachment 2

Toxic Organic Management Plan Guidance for Industrial Users that **DO NOT** Store, Use, or Generate Toxic Organic Compounds

Include the following on your title page:

- Toxic Organic Management Plan
- Date
- Business Name
- Discharge Address
- Description of Operations
- Industrial Wastewater Discharge Permit Number

Include the following elements in your Toxic Organic Management Plan:

I. List of Toxic Organic Compounds

Review the List Of Toxic Organic Compounds (EPA Priority Pollutants) included in Attachment 1 and verify that none are stored, used, or generated at your business.

II. Process Engineering Analysis Description

The process engineering analysis should determine that no toxic organic compounds are found in your business' wastewater, and should verify there are no possible sources or compounds that could enter the wastewater in the event of spills, leaks, etc., based on the type of operations conducted. Such analysis should be based on one or more monitoring events or a review of historical wastewater effluent data for the toxic organic compounds which are required to be monitored under the applicable federal category(ies) (this monitoring can be fulfilled through the Baseline Monitoring Report [BMR]), previous Self-Monitoring Reports [SMRs], or City monitoring data). The process engineering section should include:

1. A flow diagram to identify all possible wastewater sources;
2. A list of raw materials used in the industrial processes — including chemical additives and cleaning agents — and the wastewater stream(s) that toxic organic compounds could potentially enter;
3. Analytical results of samples collected demonstrating no toxic organic compounds found in the effluent; and
4. An examination of sources such as equipment corrosion or raw material impurities that could result in release of toxic organic pollutants to wastewaters. For example, this could include supplier spec-sheets.

III. Pollutant Control Evaluation

If toxic organic compounds are not present onsite, a pollutant control evaluation is not required. Include a statement in this section indicating that no toxic organic compounds are stored, used, or generated. Also include the certification statement listed below under Section V. B. with each Self Monitoring Report.

IV. Toxic Organic Compound Management Program

Include a plan to ensure that no toxic organic compounds will be stored, used, or generated in the future. Explain how purchasing practices will review all new chemical compounds to determine the presence of regulated toxic organic compounds as listed on your wastewater discharge permit. If the chemical contains a regulated toxic organic compound, you must notify your Source Control Inspector and submit an updated Toxic Organic Management Plan for approval (see Attachment 1). If applicable, notify customers not to send parts which may contain or be contaminated with toxic organic compounds, etc.

V. Certification Statements

A. Include the *Toxic Organic Management Plan Certification* with the TOMP submittal, which can be found at: www.sanjoseca.gov/pretreatmentforms.

B. A *Total Toxic Organics Certification Statement* must be submitted with each Self Monitoring Report. This form can be found at: www.sanjoseca.gov/pretreatmentforms.

San José-Santa Clara Regional Wastewater Facility

TOXIC ORGANIC MANAGEMENT PLAN CERTIFICATION

COMPANY NAME:

DISCHARGE ADDRESS:

INDUSTRIAL WASTEWATER DISCHARGE PERMIT NUMBER:

In compliance with Federal and City regulations, this Toxic Organic Management Plan h
to establish a safe and legal procedure for storing, labeling, and disposing of toxic organ
Toxic Organic Management Plan certifies that toxic organic compounds are not discharg
sewer. If any toxic organic compounds are used, purchased, or stored on site that are not
the assigned Source Control Inspector will be notified and an updated plan will be submitte

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prep
or supervision in accordance with a system designed to assure that qualified perso
evaluate the information submitted. Based on my inquiry of the person of persons
or those persons directly responsible for gathering the information, the informa
best of my knowledge and belief, true, accurate, and complete. I am aware that th
for submitting false information, including the possibility of fine or imprisonment fo

PREPARED BY:

Printed Name Email

Signature Date

EXECUTIVE OFFICER:

Printed Name Email

Signature Date

Municipal Code requires that reports required by the Director shall be signed
the application. Such Executive Officer shall be at least of the level of Vice Pr
individual responsible for the overall operation of the facility applying for th
NPDES applications as contained in Code of Federal Regulations, Title 40 Pr

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San José-Santa Clara Regional Wastewater Facility

TOTAL TOXIC ORGANICS CERTIFICATION STATEMENT

COMPANY NAME:

DISCHARGE ADDRESS:

INDUSTRIAL WASTEWATER DISCHARGE PERMIT NUMBER:

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTOs), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since the filing of the last discharge report. I further certify that this facility is implementing the latest Toxic Organic Management Plan submitted to the San José-Santa Clara Regional Wastewater Facility.

PREPARED BY:

Signature Date

Printed Name and Title

EXECUTIVE OFFICER:

Signature Date

Printed Name and Title

IF TOXIC ORGANICS ARE STORED, USED, OR GENERATED AT THIS FACILITY, A TOXIC ORGANIC WORKSHEET FOR EACH CHEMICAL SHALL BE ENCLOSED.

Municipal Code requires that reports required by the Director shall be **signed by an Executive Officer of the business filing the application**. Such Executive Officer shall be at least of the level of Vice President, General Partner, President, or an individual responsible for the overall operation of the facility applying for the Permit or meet the Federal requirements for NPDES applications as contained in Code of Federal Regulations, Title 40 Protection of the Environment, Part 403.12(l).

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