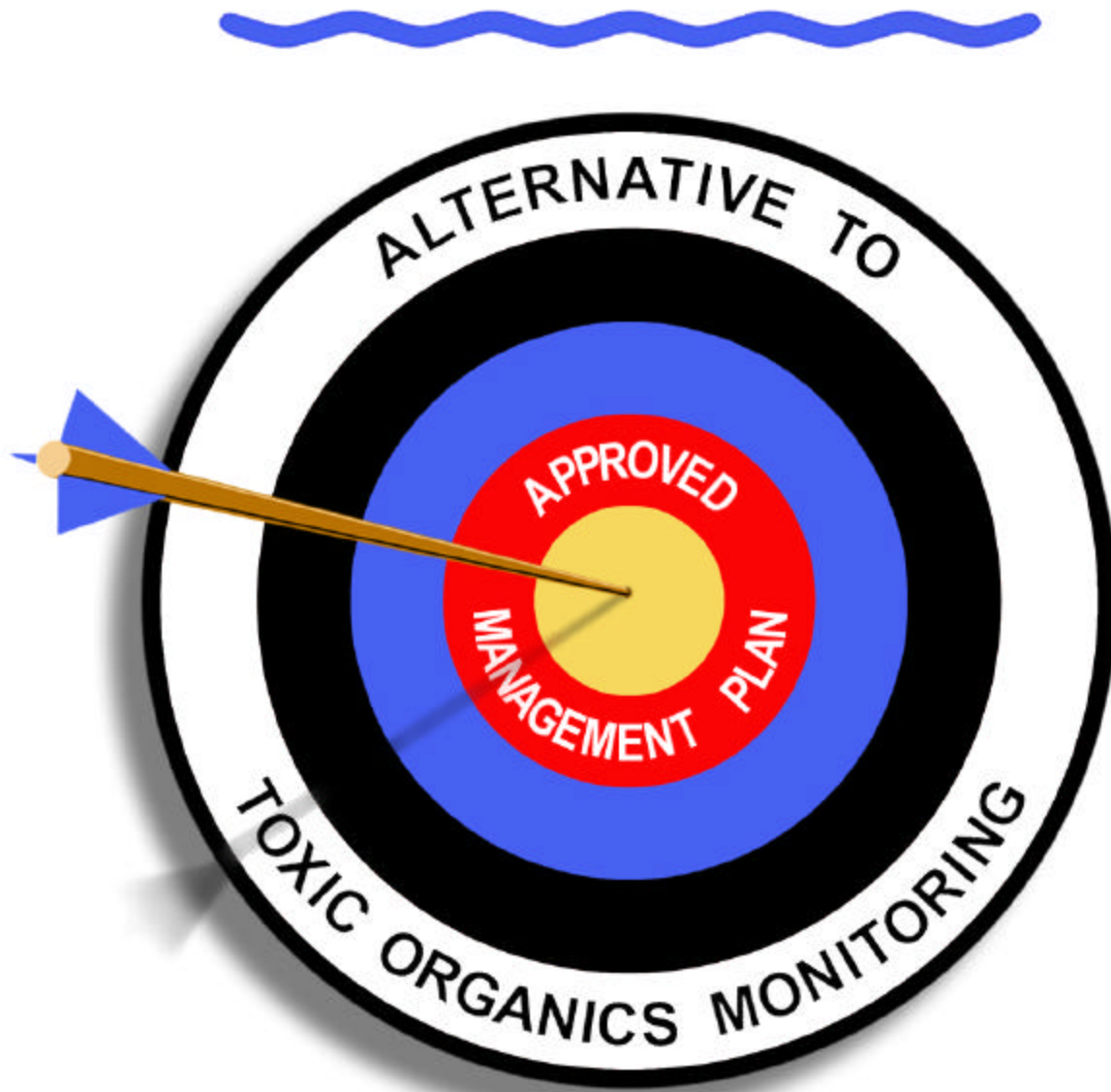


Guide to Preparing a Streamlined Toxic Organic Management Plan



“Target Your Toxics Management”

**City of Los Angeles
Bureau of Sanitation
Industrial Waste Management Division**

The City of Los Angeles Bureau of Sanitation, Industrial Waste Management Division (IWMD) administers the federal and local pretreatment program for the City of Los Angeles. IWMD monitors, regulates, and controls industrial wastewater discharges to the City's sewer system by administering and enforcing the local Industrial Waste Control Ordinance as well as federal EPA pretreatment regulations. An Industrial User discharging to the City's sewer system is responsible for maintaining compliance with the conditions and requirements specified in the Industrial Wastewater Permit. For assistance, call the IWMD Engineering Section at (323) 342-6092 or the Inspection Section at (342) 342-6190.

2012 Edition

This publication was originally prepared in 2001 by Jacobs Engineering Group Inc. under contract to the City of Los Angeles. Donna Toy Chen served as the Project Manager. IWMD staff included Lonnie Ayers and Sherrill Bond. This edition updated the IWMD's phone numbers and address.

Introduction

The Bureau of Sanitation Industrial Waste Management Division (IWMD) has adopted a new simplified procedure for industrial users (IU's) to prepare, certify, and submit a streamlined Toxic Organic Management Plan (TOMP). Once approved by the IWMD, the IU is authorized to certify compliance rather than monitor for toxic organics.

Industrial categories that may rely upon a certified and approved TOMP in place of monitoring include Electroplating (40 CFR 413), Metal Finishing (40 CFR 433), and Electrical and Electronics Components (40 CFR 469). These three categories represent a majority of the active categorical dischargers permitted in the City.

Regulatory Background

Seven federally regulated industrial categories have pretreatment standards established for total toxic organics (TTO). The term TTO is defined as the sum of specific toxic organic compounds found in the process discharge at a concentration of 0.01 mg/l (10 ppb) or more. Categories affected by a TTO limit include:

- Electroplating (40 CFR 413),
- Metal Finishing (40 CFR 433),
- Electrical and Electronic Components (40 CFR 469),
- Metal Molding and Casting (40 CFR 464),
- Coil Coating (40 CFR 465),
- Aluminum Forming (40 CFR 467), and
- Copper Forming (40 CFR 468).

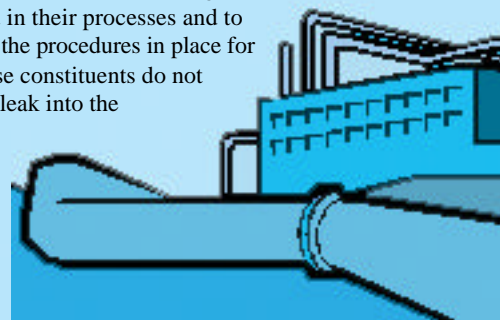
In addition to these seven categories, Pharmaceutical Manufacturing (40 CFR 439) is subject to a specific list of toxic organics with individual discharge limits.

Compliance with the pretreatment standards may be demonstrated in several different ways. The USEPA has proposed three approaches to allow for maximum flexibility while ensuring reductions in the amount of organic pollutants discharged. The three proposed approaches are:

- 1) Meet a numerical limit for the total sum of a list of specific organic pollutants.
- 2) Meet a numerical limit for an indicator parameter of TTO.
- 3) Develop and certify the implementation of a toxic organic management plan (TOMP).

Not all three approaches are available to all seven industrial categories. Reliance upon an approved TOMP in place of monitoring for TTO is limited to the first three categories: Electroplating, Metal Finishing, and Electrical and Electronic Components.

In preparing a TOMP, the USEPA requires an IU to identify all of the toxic and non-conventional organic constituents used in their processes and to describe in detail the procedures in place for ensuring that these constituents do not routinely spill or leak into the wastewater system. The TOMP also requires the IU to describe procedures enacted for controlling the formation of chlorinated byproducts.



These requirements for preparing a TOMP have proven to be an involved and complex process, which requires a significant amount of paperwork and extensive review by the POTW or cognizant regulatory authority. The procedure is burdensome in that it requires the IU to compile a large amount of process information. This data collection is then followed by a process engineering analysis and a pollution control evaluation. To date, few Plans have been prepared and submitted to the IWMD for approval.

The IWMD Approach

In an effort to streamline the overall preparation and approval process, the Bureau of Sanitation Industrial Waste Management Division has adopted a simplified procedure for preparing a TOMP. This simplified procedure makes use of the fact that much of the paperwork requested by the USEPA is already on file. Submittal of this information occurs when an IU initially files for an Industrial Wastewater Permit and is updated upon each permit renewal cycle.

It is also known through periodic monitoring of the effluent by the IWMD, which facilities are consistently compliant. Rather than postpone the approval of a TOMP while these facilities conduct an exercise documenting how they ensure compliance, the IWMD recognizes that demonstrated compliance is the relevant issue. For these reasons, the streamlined TOMP was proposed.

The streamlined TOMP consists of two single-page forms: the Request for TOMP Approval and the TOMP Checklist. Example forms may be found at the back of this guide (please contact IWMD for official forms). The TOMP Checklist covers all of the USEPA requirements for obtaining a TOMP in an abbreviated, yet comprehensive and easy to complete format. The Request for TOMP Approval allows the IU to certify that their Plan is being implemented and that they comply with TTO pretreatment standards.

Instructions for Completing the Streamlined TOMP

The following instructions are provided to assist in the preparation and completion of a streamlined TOMP. As previously stated, a streamlined TOMP consists of two single-page forms: the Request for TOMP Approval and the TOMP Checklist. Should you have any questions regarding the completion of these forms, please contact the IWMD for assistance.

Request for TOMP Approval

This form provides the IWMD with basic information about your operation and it allows you to certify that your TOMP is being implemented. To be eligible for filing a Request for TOMP Approval, all of your industrial waste discharges must be in compliance with TTO pretreatment standards.

Section 1 - Provide the DBA (Doing Business As) name of the facility or industrial user as identified in your current Industrial Wastewater Discharge permit. Identify your industrial category type (i.e., electroplating, metal finishing, or electrical and electronic components).

Section 2 - Provide the phone number of the Plant Manager, Chief Executive Officer, or other person responsible for certifying the TOMP. List all waste discharge permits held by the facility along with the IU identification number assigned by the IWMD.

Section 3 - Provide a complete street address, including zip code, for the location where the permitted discharge occurs. Do not enter a P.O. Box or mailing address.

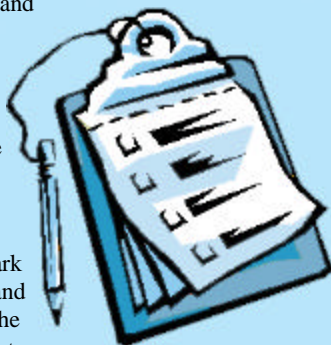
Sections 4, 5, and 6 - The person responsible for certifying the TOMP must sign and print their full name on the line following the certification statements, followed by their title and date. The person signing the form assumes full legal responsibility for ensuring that the facility is in compliance with TTO pretreatment standards, that the filed Plan is being implemented, and that all submitted information is true, accurate, and complete.

Section 7 - No action is required. This section of the form lists all of the information required by the USEPA for inclusion in the TOMP. This same scope and format of information is followed in the TOMP Checklist.

TOMP Checklist

The TOMP Checklist is designed to easily document your usage of toxic organics and the Best Management Practices you utilize to prevent their discharge. As required by the USEPA, the left side of the Checklist covers the usage and management of toxic organics while the right side covers the utilization of Pollution Prevention techniques.

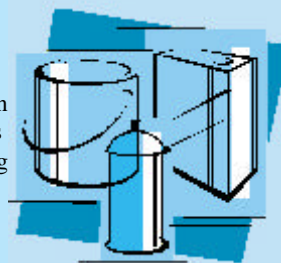
To complete the form, place a checkmark in column "A" to identify your usage and sources of toxic organics followed by the BMPs employed. An IWMD representative will complete Column "B" as part of the verification process.



Toxic Organic Compounds (left side)

TO Usage - Indicate by placing a checkmark in Column "A" whether Material Safety Data Sheets (MSDSs) for toxic organics or materials containing toxic organics have been submitted with the most recent permit application. If none have been submitted, then submit the MSDSs with this form.

TTO Sources - Indicate all potential sources of TTO that may be present or used in the facility such as solvents, lubricants, or cleaning solutions. Other sources may include leaking tanks, contaminants or ingredients in the raw materials, chemical reactions that may result in the production of TTO, organics-contaminated discharges from air pollution control devices, leaching of plasticizers from non-metallic process tanks and piping, painted surfaces or cleanup of painting equipment, etc. If other, please specify.



Disposal Methods - Indicate the method used to dispose of TTO whether via offsite disposal or reclamation, discharge to sanitary sewer, evaporation and sludge disposal, or incineration. If other, please specify the type of disposal method.

Spill Prevention Techniques - Indicate all types of spill prevention devices or techniques that the facility employs as part of its TOMP. These could include berms surrounding all processes and/or bulk chemical containers containing toxic organics, sealing off or rerouting floor drains, double-containment or continuous monitoring of process tanks and process piping, storm drain collection and treatment systems, good housekeeping practices, etc. If other, please specify.

Treatment Technologies - Indicate the types of treatment technologies employed in treating toxic organics such as carbon adsorption, dissolved air flotation, air sparging, oil and grease extraction, evaporation, steam stripping, or biological treatment. If other, please specify.

Employee Training - Indicate whether you provide training to your employees in the proper application of Best Management Practices to help ensure the continued benefit of Pollution Prevention.

Other - Indicate other sources of TTO or other disposal methods, spill prevention techniques, or treatment technologies employed in the management of toxic organics.

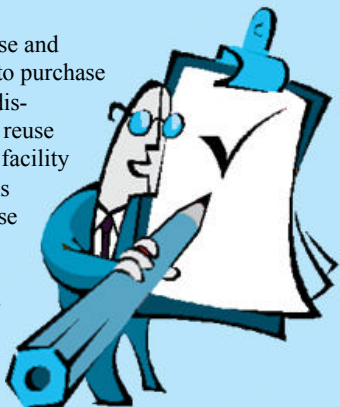
Pollution Prevention Techniques (right side)

Material Substitution Practices - Indicate when material substitution of a toxic organic either with a non-toxic compound or a less toxic compound has been utilized to reduce or prevent the release of a toxic organic into the environment. If other, please specify.

Process Modifications - Process modifications can result in potential savings of raw materials while reducing pollutant discharges. Identify the process modifications the facility has employed to reduce or eliminate the use of toxic organics. If other, please specify.

On-Site Reuse Techniques - On-site reuse and recycling methods can reduce the need to purchase raw materials while reducing pollutant discharges. Identify the applicable on-site reuse and recycling methods employed at the facility when handling toxic organics or materials containing toxic organics. If other, please specify.

Off-Site Recycling and/or Reclamation - Identify which options are employed for off-site recycling and/or reclamation of material that may contain toxic organics. If other, please specify.



Installation of Specialized P2 Equipment - Indicate the operating configurations, pollution prevention (P2) systems, and equipment that improve the opportunities for reducing and controlling organic pollutant discharges. If other, please specify.

Product Changes - Modifying the final product can sometimes be performed to reduce or eliminate the use of toxic organics. Two viable approaches include product substitution (convert to a less toxic product that provides an acceptable level of performance) and product reformation (convert to less toxic components). Indicate which if any of these approaches have been used at the facility.

Water Conservation Techniques - Indicate the water conservation techniques employed at the facility. Properly implemented, conservation can reduce both water and process chemical usage. Further benefits include reduction of overall waste streams, the need for smaller treatment systems, improved ease of waste stream segregation, and lesser quantities of treatment sludge for offsite disposal. If other techniques are employed, please specify.

Operating Practices and Management - Compliance with certain state, federal, and local guidelines for pollution prevention may qualify as a Toxic Organic Management Plan. Submittal of evidence of compliance and implementation of plans and other documentation required by the following state and Federal programs are acceptable to the IWMD in lieu of formal TOMP:

- 1) SB-14 - California Department of Toxic Substances Control (DTSC) Source Reduction and Management Review Act of 1989 (requires submittal of facility Reports and Plans).
- 2) ISO 14000 - A voluntary certification process for waste stream management (requires submittal of evidence of certification through this standard).
- 3) EMS - Environmental Management Systems (requires evidence of implementation of an approved environmental management system per ISO 14000 standards). Implementing changes of operating practices that will

result in segregated waste streams usually allows for reduced costs in controlling, reclaiming, and treating toxic organics. Please indicate if your facility is participating in any of these operating practices or management programs.

Other - Please attach additional pages if more space is needed to describe pollution prevention techniques or BMPs employed by your facility that are not listed on the TOMP Checklist.

Forms Submittal

Upon completion of these two forms, attach all supporting documentation as needed and mail to the following address:

**City of Los Angeles
Industrial Waste Management Division
2714 Media Center Drive
Los Angeles, CA 90065
Attn: Environmental Engineer, SIU Permitting Section**

Upon receipt of the Request for TOMP Approval, the IWMD will proceed to evaluate the request. The IWMD will verify the information submitted, request additional information as necessary, and conduct an engineering analysis to determine that the TOMP is sufficiently effective to be approved. Through the issuance of an amended permit, the facility will be notified of TOMP approval.

If final approval cannot be granted, the facility may implement additional BMPs and refile for approval by providing evidence that the modifications are effective. The facility must continue to comply with all current permit requirements, including TTO monitoring, until an amended permit indicating TOMP approval has been issued. After receipt of the amended permit, the facility is required to submit periodic certification statements as an alternative to TTO monitoring.

In Conclusion

The IWMD wants your facility to succeed in complying with the regulations as a responsible industrial discharger. This simplified set of procedures is designed to facilitate compliance by minimizing the monitoring and paperwork burdens imposed by the regulations. IWMD will work with you to ensure this process works as smoothly and efficiently as possible. To this end, IWMD hopes this new TOMP Approval program will be well received by the regulated community.

References

U.S. Environmental Protection Agency. Monitoring Flexibility for Organic Pollutants, Federal Register, Vol. 66, No.2, January 3, 2001, Proposed Rules.

U.S. Environmental Protection Agency, Guidance Manual for Implementing Total Toxic Organics (TTO) Pretreatment Standards, September 1985.

City of Los Angeles, Public Works, Bureau of Sanitation, Industrial Waste Management Division. Total Toxic Organics Monitoring and Monitoring Options, June 2001.

REQUEST FOR TOXIC ORGANIC MANAGEMENT PLAN APPROVAL																		
DBA: _____		CATEGORY: _____																
PHONE: (____) _____ - _____																		
PERMIT(S):	W -	W -	IU															
ADDRESS:	STREET: _____																	
	CITY, STATE, ZIP: _____																	
<p>This is a request for approval of the Toxic Organic Management Plan (TOMP) utilized by this facility. The undersigned authorized representative understands that approval of the TOMP will allow the facility to certify with each periodic Self-Monitoring Report that the TOMP is implemented rather than monitor for toxic organics.</p>																		
	<p>I certify that this facility is implementing the attached Toxic Organic Management Plan.</p> <p>Based on my inquiry of the person or persons directly responsible for managing compliance with pretreatment standards for total toxic organics (TTOs), I certify, to the best of my knowledge and belief, that no dumping of concentrated toxic organics into the wastewater has occurred since the TOMP has been implemented.</p> <p>I certify that this facility will continue to monitor for toxic organics until the City of Los Angeles has approved the attached TOMP.</p>																	
<p>I further certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p>																		
Auth. Representative Signature _____		Print Name _____	Title _____															
			Date _____															
<p>In requesting that no monitoring of toxic organics be required, the industrial user indicated above shall submit, to the satisfaction of the City of Los Angeles, a Toxic Organic Management Plan that specifies the following:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">Toxic Organic Compounds Used</td> <td style="width: 33%;">Disposal Methods</td> <td style="width: 33%;">Treatment Technologies</td> </tr> <tr> <td>Toxic Organic Sources</td> <td>Spill Prevention Techniques</td> <td>Employee Training</td> </tr> </table> <p>The Toxic Organic Management Plan also requires that the industrial user specify which of the following Pollution Prevention techniques are utilized:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">Material Substitution</td> <td style="width: 33%;">Off-Site Reuse/Reclamation</td> <td style="width: 33%;">Water Conservation</td> </tr> <tr> <td>Process Modifications</td> <td>Install P2 Equipment/Systems</td> <td>Operating Practices & Management</td> </tr> <tr> <td>On-Site Reuse</td> <td>Product Changes</td> <td>Other</td> </tr> </table>				Toxic Organic Compounds Used	Disposal Methods	Treatment Technologies	Toxic Organic Sources	Spill Prevention Techniques	Employee Training	Material Substitution	Off-Site Reuse/Reclamation	Water Conservation	Process Modifications	Install P2 Equipment/Systems	Operating Practices & Management	On-Site Reuse	Product Changes	Other
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Process Modifications	Install P2 Equipment/Systems	Operating Practices & Management																
On-Site Reuse	Product Changes	Other																

NOTE: Upon approval, the City of Los Angeles will incorporate the approved Toxic Organic Management Plan as part of the Industrial Wastewater permit.

FOR OFFICIAL USE ONLY

Postmarked Date: _____	Data Input By: _____	Reviewed By: _____
Received Date: _____	Input Date: _____	Review Date: _____

TOXIC ORGANIC MANAGEMENT PLAN (TOMP)

IU DBA NAME:

IU #:

Instructions: This form must be submitted with the "Request for Toxic Organic Management Plan Approval." Please place a checkmark (✓) in Column "A" for all items applicable to this facility.

Note: Column "B" to be completed by City personnel to verify the accuracy of this TOMP.

A	Toxic Organic Compounds	B		A	Pollution Prevention Techniques	B
	TO Usage				Material Substitution	
	MSDS's Attached				Water-based (non-halogenated) solvents	
	MSDS's Previously Submitted				Non-chlorophenolic biocides	
	TTO Sources				Alkaline (not solvent) degreasing	
	None				Replace acetone with ethyl acetate	
	Solvent				Process Modifications	
	Lubricant				Water-based coolants & Inks, not oil-based	
	Cleaning Solution				Drag-out reduction (air knives, drain boards)	
	Non-Metal Tanks				Use of high pressure/low volume systems	
	Raw Materials				Reusable filters/containers, not disposable	
	Chemicals Reaction				On-Site Reuse	
	Air Pollution Control Devices				Solvent recycling	
	Paints				Regeneration of forge & machine coolants	
	Other				Polystyrene recycling	
	Disposal Methods				Off-Site Recycling/Reclamation	
	Offsite Disposal or Reclamation				Tramp oils	
	Discharge to Sewer				Machine shop coolants	
	Evaporation				Inter-industry waste exchange	
	Incineration				Install P2 Equipment/Systems	
	Treatment				Refrigerated freeboard on vapor degreasers	
	Other				Over-flow control devices	
	Spill Prevention Techniques				Closed-loop systems	
	Berming				Equipment modernization	
	Floor Drains				Product Changes	
	Process Tanks				Substitution (use a less toxic product)	
	Process Piping				Reformulation (use less toxic components)	
	Ground Water Protection				Water Conservation	
	Storm Drain				Over-tank rinsing	
	Sewer Connections				Counter-current rinsing	
	Cleanouts				Cascade rinsing	
	Storage Areas				Static rinsing	
	Other				Reuse of treated effluent	
	Treatment Technologies				Use of spray rinsing	
	Carbon Absorption				Install aeration device on faucets	
	Dissolved Air Flotation				Recirculating cooling	
	Air Sparging				Operating Practices & Management	
	Oil and Grease Extraction				SB-14	
	Evaporation				ISO 14000	
	Steam Stripping				Environmental Management System (EMS)	
	Biological Treatment				Other Environmental Management Programs	
	Employee Training				Segregate wastestreams eliminating TO and other pollutant formation	
	Proper Application of BMPs				Other (List)	
	Other (List)					
	See Attached				See Attached	

FOR OFFICIAL USE ONLY

Verification By:

Signature

Print Name

Title

Date



CITY OF LOS ANGELES



SANITATION
DEPARTMENT OF
PUBLIC WORKS

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities.