



Industrial Waste and Pollution Prevention

Total Toxic Organics Management Plan

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Total Toxic Organics (TTO) limitations have been promulgated for all process wastewater classified as Metal Finishing and Electroplating Categorical Discharge (40 CFR Part 433 and 40 CFR Part 413). TTO is defined as the summation of all toxic organics present in concentrations greater than 0.01 mg/L. Maximum daily TTO concentration limitations and compliance dates for metal finishers and electroplaters are as follows:

Category	TTO Limitation (mg/L)	Final Compliance Date
Metal Finishing	2.13	February 15, 1986
Electroplating – less than 10,000 GPD	4.57	July 15, 1986
Electroplating – 10,000 GPD or greater	2.13	July 15, 1986

The Permittee has the option of demonstrating compliance by routine TTO monitoring or by certifying, on each Reporting Period Information Self-Monitoring Report (SMR), that TTOs are controlled through the implementation of a Metropolitan Council approved TTO Management Plan. The certification does not remove liability for noncompliance with the TTO limitations. The certification option will not be accepted if existing monitoring data indicates noncompliance with TTO limitations or if Metropolitan Council has evidence of concentrated TTO discharges into public sewers. In such cases, routine TTO monitoring will be required.

Approval of the alternative certification by the Industrial Waste and Pollution Prevention Section requires the Permittee to develop and submit a TTO Management Plan that identifies the toxic organic compounds used. The TTO Management Plan must include the following:

1. A list of TTO compounds that are used in the metal finishing and electroplating processes. The list must include the quantity/concentration of TTO compounds present in products or raw materials used in the regulated processes. Information may be based on manufacturing or supplier information. Raw materials and products may include but are not limited to chemical additives; water treatment chemicals; cleaning compounds; and solvent degreasing agents.
2. A list and diagram of regulated processes where the TTO compounds identified above are used and may enter the process discharge. If the potential exists for a TTO compound to enter the process wastewater discharge, a pollutant control evaluation shall describe the in-plant control procedures used to limit or eliminate the TTO discharge. This may include chemical substitution, operation changes, spill control, recovery, reuse, or other control methods.
3. A list of the methods of disposal used in lieu of dumping, such as reclamation, contract hauling, or incineration.
4. A list of solvent degreaser discharge volumes and frequency of discharge including associated TTO compounds and concentrations if present.

Copies of completed hazardous waste license applications may be submitted to supplement the information requested in 1-4 above. However, the essential information requested must be included in the submittal.