

CCCCSD GUIDELINES FOR PREPARING A TOTAL TOXIC ORGANIC (TTO) MANAGEMENT PLAN

I. GOAL STATEMENT

- A. General statement regarding the goals and objectives of the TTO Management Plan.
- B. Identify the strategies that will be used to accomplish the goals.

II. FACILITY INFORMATION

- A. General Description of Facility Operations.
- B. Process Wastewater Discharge Sources - Routine and Non-routine.

III. TOXIC ORGANIC INFORMATION

The coverage of this information needs to be comprehensive. Consider using a table or chart to present the information required in III.A. through III.D.

- A. TTO Inventory - List all chemicals used, produced or stored at the facility that contain constituents regulated under the District's TTO limit.
- B. TTO Analytical Data from Process Discharge - Provide a minimum of two years of analytical data for monitoring TTO discharges.
- C. Processes Using TTOs - Identify all processes within the facility that use TTO compounds in the process including maintenance activities.
- D. TTO Disposition:
 - 1. For each TTO compound listed in the TTO inventory, identify the disposition of the compounds.
 - 2. Provide an estimate of the average volume of TTO compounds used per month.
 - 3. Provide an estimate of the average volume of TTO waste generated per month.

IV. TTO CONTROL MEASURES

Identify the control measure to be implemented under each category listed below, and explain how the measure will have a beneficial effect on controlling TTO discharges to the sanitary sewer.

- A. Administrative Controls
Examples:
 - 1. Conduct work practices involving TTO compounds away from sanitary sewer inlets.
 - 2. Develop and implement work practices that will ensure spill prevention.
- B. Engineering Controls
Examples:
 - 1. Install secondary containment for storage and process areas that handle TTO compounds.
 - 2. Modify processes to eliminate use of TTO compounds.
 - 3. Install equipment to prevent spills.

C. Inventory Controls

Examples:

1. Eliminate or minimize use of chemicals on-site that contain TTO compounds.
2. Monitor new purchases to control the introduction of TTO compounds.

V. EMPLOYEE TRAINING

- A. Identify employees to be trained, the scope of training to be provided, and the frequency at which training will be given.
- B. Include a copy of the training material specific to the TTO Management Plan.

VI. CERTIFICATION

- A. Certification Statement

"Based on my inquiry of the person or persons directly responsible for managing compliance with the TTO limitations, I certify that this facility is fully implementing the toxic organic pollutant management plan submitted to the Control Authority (Central Contra Costa Sanitary District) on ____ (date to be specified) ____."

- B. Signature

The Certification Statement must be signed by an authorized facility representative, i.e., an officer of the company or manager responsible for overall plant operations.