



Warwick Sewer Authority (WSA) – Industrial Pretreatment Program (IPP)

Toxic Organic Management Plan

The Federal Government, through the provisions of the General Pretreatment Regulations (40 CFR Part 403), and the Federal Water Pollution Act, also known as the Clean Water Act (33 United States Code (U.S.C.) § 1251 *et seq.*), requires that the local Sewer Authority establish procedures for the enforcement of pretreatment standards and requirements. In accordance with Article 6 of the Warwick Sewer Authority's (WSA) Sewer Use Ordinance (SUO) the WSA may require any user who discharges into the Publicly Owned Treatment Works (POTW) to ensure compliance with pretreatment methods and regulations including pollutant limits.

According to Federal pretreatment standards, Significant Industrial Users (SIU)/Categorical Industrial Users (CIU) are periodically required to monitor for Total Toxic Organics (TTO's). Federal law also allows for these User's to prepare, adopt, implement and maintain a Toxic Organic Management Plan, that if/when approved by the WSA's Industrial Pretreatment Program (IPP), will provide the User with a waiver from performing some/all of their required TTO monitoring.

In order to ensure that TTO's and solvents are not being discharged to the POTW, the WSA IPP is requiring that the User prepare and submit a Total Organic Management Plan in lieu of regular monitoring for some/all toxic organics and solvents. This form when completed, submitted and approved by the WSA's IPP will constitute the permitted User's Toxic Organics & Solvent Management Plan. The User will be ultimately responsible for adhering to all items addressed in the plan in order to ensure that TTO's and solvents are not discharged to the POTW.

When the Toxic Organic Management Plan has been completed, please retain a **COPY for your records** and **mail the ORIGINAL** document, complete with signatures and attachments (where required) to:

Edward Mathias, Pretreatment Coordinator
Warwick Sewer Authority
125 Arthur W. Devine Boulevard, Suite B
Warwick, RI 02886

On behalf of our Pretreatment Program, we thank you in advance for your cooperation in ensuring we receive the completed forms and for your steadfast commitment to environmental protection through pretreatment compliance.

Section 1 – General Facility Information

Name of Company or Corporation:	
“Doing Business As” (DBA) if different from Company/Corp. Name:	
Facility Address:	
Work Phone Number:	
Email Address:	
Plan Prepared By:	
Title:	
Signature & Date:	

Section 2: Confirmed Purchase and Use of Toxic Organics & Solvents

Does your firm use or reasonably expect to process (i.e. a work order from a location that may use or contain toxic organics) any solvents, chemicals or other compounds containing any of the toxic organic compounds listed in **TABLE A: EPA List of Toxic Organics** attached at the end of this document or other solvents such as xylene, acetone, etc. not listed in the attached table?

Yes - Complete all sections, excluding **SECTION 8**.

No - Complete **SECTION 5 & SECTION 8** only.

Section 3: Estimate of Annual Toxic Organics & Solvents Purchase and Usage

In **TABLE B: Estimate of Annual Toxic Organics & Solvents Purchase and Usage** provided at the end of this document, list the type and estimated amount of solvents or toxic organic chemicals purchased at/for your facility, along with a brief description detailing the use of the chemical (refer to the EPA list of toxic organic compounds provided). In addition to the EPA chemical list, include any/all other solvents used on the premises, for example: Acetone, 100 gal/yr, used for paint removal. Additional sheets may be used if required.

Section 4: Estimate of Annual Toxic Organics & Solvents Storage and Disposal

In **TABLE C: Estimate of Annual Toxic Organics & Solvents Storage and Disposal** provided at the end of this document, you must account for the total gallons of each solvent and/or toxic organic chemical you have listed in **TABLE B**. You must provide information regarding the volume of the chemical stored on site, the method of disposal (i.e., reclamation, hauler, consumption, evaporation, sewer discharge, other) and quantity, as well as, the total volume in gallons stored/disposed of annually for your facility. Additional sheets may be used if required.

Section 5: Certificate of Wastewater Analysis

Has your process wastewater been analyzed for the compounds listed in **TABLE A**?

No

Yes, ALL of the toxic organics and solvents identified in **TABLE A** have been analyzed

If yes, please attach a copy of the most recent analysis. If no, this monitoring must be conducted and the analytical results for all compounds listed in **TABLE A** must be included in the report.

Section 6: Process Operations Using Toxic Organics & Solvents

A. DISCHARGE PREVENTION

For each of the toxic organics and solvents identified in **TABLE B** you must provide a brief description of the process in which the chemical is used and the detailed process/methods employed to prevent and prohibit the chemical from entering the discharge from the facility (i.e., via drag-out, drippage, spillage, other).

Section 8: Written Assurance

Please complete only if No was selected in Section 2.

If your firm does not use or expect to process any of the toxic organics found in **TABLE A**, please provide written assurance detailing why you would not expect your waste stream to contain these pollutants. Please note that your process waste stream must still be analyzed a minimum of once by a RIDOH Certified Laboratory to demonstrate compliance. Additional monitoring may be required based upon the results of these analyses.

SECTION 9:

REPORT CERTIFICATION

“I 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 assure that qualified personnel properly gather and evaluate the information submitted. 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 violation. Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitations for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters occurred since the filing of the last report. I further certify that this facility is implementing and will abide by this Toxic Organic Management Plan as submitted to the Warwick Sewer Authority.”

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Printed Name of Authorized Agent

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Title of Authorized Agent

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Signature of Authorized Agent

Date

TABLE A: EPA LIST OF TOXIC ORGANICS

TTO Chemical Name		TTO Chemical Name	
1	Acenaphthene	57	2-Methyl-4,6-Dinitrophenol
2	Acrolein	58	N-nitrosodimethylamine
3	Acrylonitrile	59	N-nitrosodiphenylamine
4	Benzene	60	N-nitrosodi-n-propylamine
5	Benzidine	61	Pentachlorophenol
6	Carbon Tetrachloride	62	Phenol
7	Chlorobenzene	63	Bis(2-ethylhexyl)phthalate
8	1,2,4-Trichlorobenzene	64	Buty benzyl phthalate
9	Hexachlorobenzene	65	Di-n-butyl phthalate
10	1,2-Dichloroethane	66	Di-n-octyl phthalate
11	1,1,1-Trichloroethane	67	Diethyl phthalate
12	Hexachloroethane	68	Dimethyl phthalate
13	1,1-Dichloroethane	69	Benzo(a)anthracene
14	1,1,2-Trichloroethane	70	Benzo(a)pyrene
15	1,1,2,2-Tetrachloroethane	71	Benzo(b)fluoranthene
16	Chloroethane	72	Benzo(k)fluoranthene
17	bis(2-Chloroethyl)Ether	73	Chrysene
18	2-Chloroethyl vinyl ethers	74	Acenaphthylene
19	2-Chloronaphthalene	75	Anthracene
20	2,4,6-Trichlorophenol	76	Benzo(g,h,i)perylene
21	Parachlorometa cresol (4-chloro-3-methylphenol)	77	Fluorene
22	Chloroform	78	Phenanthrene
23	2-Chlorophenol	79	Dibenzo(a,h)anthracene
24	1,2-Dichlorobenzene	80	Indeno(1,2,3-cd)pyrene
25	1,3-Dichlorobenzene	81	Pyrene
26	1,4-Dichlorobenzene	82	Tetrachloroethylene
27	3,3'-Dichlorobenzidine	83	Toluene
28	1,1-Dichloroethylene	84	Trichloroethylene
29	1,2-trans-Dichloroethylene	85	Vinyl Chloride
30	2,4-Dichlorophenol	86	Aldrin
31	1,2-Dichloropropane	87	Dieldrin
32	1,3-Dichloropropylene (cis & trans)	88	Chlordane
33	2,4-Dimethylphenol	89	4,4'-DDT
34	2,4-Dinitrotoluene	90	4,4'-DDE
35	2,6-Dinitrotoluene	91	4,4'-DDD
36	1,2-Diphenylhydrazine	92	alpha-endosulfan (Endosulfan I)
37	Ethylbenzene	93	beta-endosulfan (Endosulfan II)
38	Fluoranthene	94	Endosulfan sulfate
39	4-Chlorophenyl phenyl ether	95	Endrin
40	4-Bromophenyl phenyl ether	96	Endrin aldehyde
41	Bis(2-chloroisopropyl)ether	97	Heptachlor
42	Bis(2-Chloroethoxy)methane	98	Heptachlor epoxide
43	Methylene Chloride	99	alpha-BHC
44	Methyl chloride (Chloromethane)	100	beta-BHC
45	Methyl bromide (Bromomethane)	101	gamma-BHC
46	Bromoform	102	delta-BHC
47	Dichlorobromomethane	103	PCB-1242
48	Chlorodibromomethane	104	PCB-1254
49	Hexachlorobutadiene	105	PCB-1221
50	Hexachlorocyclopentadiene	106	PCB-1232
51	Isophorone	107	PCB-1248
52	Naphthalene	108	PCB-1260
53	Nitrobenzene	109	PCB-1016
54	2-Nitrophenol	110	Toxaphene
55	4-Nitrophenol	111	(TCDD) 2,3,7,8-Tetrachlorodibenzo-p-dioxin
56	2,4-Dinitrophenol		

Table C: Estimate of Annual Toxic Organics & Solvents Disposal and Storage

Chemical Name	Gallons Typically Stored On-Site	GALLONS DISPOSED ANNUALLY					
		Discharged in Wastewater	Evaporated During Usage	Reclaimed On-Site	Shipped Off-Site	Consumed or Retained in Product	Other (Disposal Method)