



METRO WATER RECOVERY

TOTAL TOXIC ORGANICS & TOXIC ORGANIC MANAGEMENT PLAN IMPLEMENTATION POLICY

PURPOSE/SCOPE: This document defines the Industrial Pretreatment Program's approach for managing the authority monitoring requirements for Total Toxic Organics and for evaluating Toxic Organics Management Plans specific to sampling strategies.

Version Number	Approved By	Effective Date
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AUTHORITY FRAMEWORK

Metro's EPA-approved Industrial Pretreatment Program (approved August 25, 1986) requires Metro to:

1. Inspect and perform authority monitoring of each Significant Industrial User (SIU) at least annually (40 CFR § 403.8(f)(2)(v)).
2. Issue Wastewater Discharge Permits (Permits) to SIUs, including Categorical Industrial Users (CIUs), as required under 40 CFR § 403.8(f) and § 403.12. Permits include self-monitoring requirements based on applicable categorical standards. The Control Authority, responsible for implementing the IPP, enforces these requirements and approves TOMP's where applicable.

The Control Authority is defined as the entity responsible for implementing and enforcing the IPP, including permitting, monitoring, and enforcement of SIUs within Metro's service area. Per 40 CFR § 403.3(f), the term Control Authority refers to The POTW if the POTW's Pretreatment Program Submission has been approved in accordance with the requirements of 40 CFR § 403.11. Summarized, Metro is the Control Authority for Industrial Users within Metro's service area.

In alignment with the EPA, Region VIII Strategy, Metro enforces a comprehensive approach to monitor and regulate TTO discharges from CIUs. This strategy emphasizes the necessity for the control authority to inspect and sample the effluent from each CIU at least annually, as stipulated in 40 CFR § 403.8(f)(2)(v), and recommends that POTWs sample for all regulated pollutants discharged to the treatment works, ensuring comprehensive oversight and compliance.

Metro's implementation of this strategy includes the following actions, as they specifically pertain to the implementation of this TTOs policy:

- Annual Inspections and Sampling: Conducting thorough inspections and effluent sampling of each SIU at least once a year to assess compliance with discharge standards.
- Comprehensive Pollutant Monitoring: Sampling for all regulated pollutants, including TTOs, to ensure that all potential contaminants are monitored and controlled.
- Enforcement of Compliance: Taking necessary enforcement actions against SIUs that fail to meet discharge standards, including the potential for penalties or other corrective measures.

These summary bullets are not intended to represent Metro's full scope of training, monitoring, or enforcement activities. By adopting the EPA Region VIII Strategy in this manner, Metro ensures a focused and consistent framework for the management and regulation of TTOs, aligning with federal guidelines and enhancing pretreatment protection efforts.

may request additional supporting information or perform site visits to verify completeness of the TOMP as part of its review process.

TOMP Review

Metro will review and act on TOMP applications based on the following:

1. Metro evaluates each TOMP utilizing *The Guidance Manual for Implementing Total Toxic Organics (TTO) Pretreatment Standards* (U.S. EPA September 1985).
2. Metro will review the list of pollutants reasonably expected to be present in the CIU's wastestream, supported by documentation such as material inventories, engineering studies, or process balances. Metro will review this list for completeness and appropriateness. This review may include site visits or other requests for information.
3. Metro will approve, conditionally approve, or deny TOMP applications formally in writing.
 - If approved or conditionally approved, Metro will:
 - establish a list of TTO pollutants to be monitored for authority monitoring and for CIU self-monitoring and integrate these requirements into the Permit;
 - establish conditional implementation or operational requirements and integrate these requirements into the Permit; and
 - maintain records of TOMP approvals, granted TTO sampling waivers, and CIUs required to sample under Permit conditions to ensure historical tracking and regulatory compliance.
 - If denied, Metro will issue a decision letter to the CIU.

TOMP Implementation Requirements

CIUs with approved TOMP must annually qualify for a TTOs sampling waiver. To qualify, the CIU must meet all of the following requirements:

1. The CIU must have previously demonstrated the absence of TTOs in its discharge (e.g., Baseline Monitoring Reports or 90-Day Compliance Reports).
 - Other analytical data sets may also qualify provided they are representative of normal operations and demonstrate that TTOs are not present in the discharge.
 - Acceptable demonstrations may include prior annual self-monitoring, corrective action sampling, or other Metro-approved data showing no reasonable potential for TTOs.
 - If the CIU has modified equipment, materials, or processes in a way that could introduce TTOs since the last demonstration, Metro will require a new evaluation such as targeted resampling for pollutants reasonably expected to be present or an updated TOMP review before the waiver can continue.
2. Authority Monitoring must not register a TTO violation at the permitted facility.
3. Metro must document annually during an on-site inspection that no TTOs are reasonably expected in current operations. Annual inspections consider:
 - Raw materials used;
 - Manufacturing or production processes;

- The CIU fails to submit its annual TTOs certification or otherwise demonstrate continued qualification during inspection.
 - Metro revokes the TOMP due to enforcement actions, changes in categorical applicability, or other regulatory reasons.
 - If a previously approved TOMP is revoked or invalidated, the CIU must immediately resume sampling for the full list of TTOs specified in its Permit. Metro may also require additional monitoring or corrective actions.
 - In cases where a TOMP is revoked or invalidated, sampling requirements are governed by the same requirements outlined in TTO Sampling for CIUs without an Approved TOMP (below). This approach ensures consistency in the type, frequency, and validity of self-monitoring required under the Permit until a revised TOMP is approved.
3. **TOMP Revision Timing Considerations:**
- **Pre-change submission:** If a CIU submits a TOMP revision before implementing a change, additional sampling may or may not be required. Please consult with Metro. The approved TOMP and waiver remain valid until Metro reviews and approves the revision. Only after receiving written approval from Metro, the CIU may implement the operational changes.
 - **Post-change submission:** If a CIU makes a change before submitting a TOMP revision, self-monitoring is required immediately upon implementing the process change. Essentially, the approved TOMP becomes invalid by implementing the process change. Sampling requirements are governed by the same principles outlined in TTO Sampling for CIUs without an Approved TOMP (below) until Metro reviews and approves the revised TOMP.

TTO Self-Monitoring by CIUs without an Approved TOMP

If a CIU does not request to utilize a TTO certification in lieu of monitoring, if Metro does not approve a TOMP submitted by a CIU, or if the TOMP is revoked or invalidated, the CIU is required to self-monitor at the frequency indicated in the Permit. In this case, the CIU must sample for the full list of TTOs applicable to its categorical or sub categorical requirements. This approach ensures that all potentially relevant toxic organics are evaluated, maintains compliance with EPA categorical standards, and allows Metro to verify that no unauthorized discharges occur.

CIUs are expected to collect representative samples and follow approved analytical methods and QA/QC procedures consistent with 40 CFR Part 136. If a self-monitoring event fails to produce valid analytical data (e.g., due to laboratory QA/QC issues, sample preservation errors, or other invalid conditions), the Event shall be deemed a failure and the CIU must promptly notify Metro. A failure is defined as a sampling Event in which analytical data are invalid, inconclusive, or do not meet established Quality Assurance/Quality Control (QA/QC) criteria. For TTOs, which are evaluated as the sum of individual compounds across multiple analytical methods, the success of the Event is contingent upon the validity of all individual pollutant constituent methods. If any single required method fails for the TTO list, the entire TTO Event shall be considered a failure. Although issues may originate from a single parameter or method,

Specific steps are outlined below (see TTO Sampling Waiver for CIUs with an Approved TOMP).

- **Without an approved TOMP:** Metro will continue to schedule Events until valid pollutant data are obtained. If sampling cannot be completed within the calendar year, Metro documents all attempts and submits the information to EPA in accordance with 40 CFR §403.12(i).

These Region VIII Strategy procedures are applied solely to satisfy the annual monitoring requirement when valid analytical data cannot be obtained. These procedures do not substitute for regular compliance monitoring or modify any existing permit requirements.