OhioEPA
State of Ohio Environmental Protection Agency
Southwest District

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Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

July 23, 2009

Mr. David Vickroy
Hartzell Manufacturing Company, Inc.
P.O. Box 808
Miamisburg, Ohio 45343

Re: Hartzell Manufacturing Co., Inc. -- Miamisburg -- IU Inspection & Notice of Violation

Dear Mr. Vickroy:

On July 14, 2009, I conducted the annual industrial user (IU) inspection at the Hartzell Manufacturing facility in Miamisburg. The facility was represented by Mike Alspaugh and yourself. The facility is considered to be a significant industrial user (SIU) as defined in Ohio Administrative Code (OAC) 3745-36-02(U)(1) due to the fact the facility is subject to categorical standards. Because of the iron phosphating and gold irriditing operations, the facility is regulated under 40 CFR 433.17, New Source Metal Finishing Standard. The inspection included the phosphating and irriditing lines.

The Toxic Organic Management Plan (TOMP) with the sampling data needs to be submitted by the facility to use the certification option for its Total Toxic Organics (TTOs). The facility is still not using the correct units on its self-monitoring reports. The contract laboratory provides the units in milligrams per liter, but the self-monitoring report requires the data be submitted in micrograms per liter. Because of these issues, the facility will receive a rating of marginal.

Brief Description of Facility

Hartzell Manufacturing is job shop metal finisher. The facility's primary function is the fabrication of parts, but they can also do various types of metal finishing. These include an iron phosphating treatment, gold irriditing, chromating, and powder coating. The facility's primary customer base is the manufacture of parts for the medical equipment manufacturers in the Cincinnati area. The facility also makes control boxes for other manufacturers.

The facility is investigating the removal of the gold irriditing process, and replacing it with a clear non-chrome sealer. This would eliminate the Alodine 5200 and the chromium in the process. The iron phosphating line would still remain at the facility. Hartzell is still working with its customers on this switch. Some customers are now using the non-chrome alternative of Alodine 5900.

Regulated Flows and Pretreatment

The facility discharges wastewater from its iron phosphating and irriditing lines. On a batch basis, the concentrate tanks are discharged. The soap and acid tanks are dumped at the same time to neutralize each other. This is done every couple months. If the lines are not running, then there is no discharge for the facility. The solids may be removed from the system every three to four years. These would be disposed of off-site. The gold irriditing tank is not dumped.

The wastewater is discharged into a trench drain in the washroom that goes to the sewer. There is both a still rinse and a pressure rinse. There is also a vapor degreaser associated with the process. The degreaser is using trichloroethylene for part cleaning. A still is being used for this. There is no discharge associated with the degreaser. The wastestream is taken by Parts Cleaning Technology. This volume was reduced due to the still. There is a welder at the facility that has been tied into the closed loop chiller. This discharge has been eliminated.

Sampling

The facility is sampling as required in its permit with the exception of TTOs. Sampling was completed in the second half of 2008, but not in the first half of 2009. A TOMP has still not been submitted to allow for the use of the certification statement. This certification statement was included in the report for the first half of 2009. The TOMP must be submitted, or the facility will need to sample for TTOs once every six months. As part of the TOMP, sampling of the volatile and semi-volatile organics must be completed and submitted with the plan. The sampling completed in the second half of 2008 can be used for this purpose. After approval, a certification statement can be submitted with each self-monitoring report. If the facility chooses not to submit a TOMP, the sampling of all TTO parameters is required once every six months. A copy of the TOMP guidance has been attached to this report. In addition, the data should be reported in micrograms per liter (ug/L) not milligrams per liter (mg/L). This was also noted in last year's inspection. This letter will serve as the Notice of Violation for these reporting violations.

REQUIRED ACTIONS

1) Hartzell Manufacturing must submit a Toxic Organics Management Plan (TOMP) or sample twice a year for Total Toxic Organics (TTOs). If the certification option is chosen, the TOMP must be submitted by August 28, 2009.

2) Hartzell Manufacturing must report the data in micrograms per liter (ug/L) not milligrams per liter (mg/L) for its self-monitoring reports. This must be done with the next report.

Your assistance was appreciated. Should you have any additional questions, feel free to contact me at 937.285.6108.

Sincerely,

Marianne Piekutowski
District Pretreatment Coordinator
Division of Surface Water

Enclosures

Cc: Dave Reinker, Miamisburg
Ryan Laake, DSW/CO

OhioEPA

State of Ohio Environmental Protection Agency
Southwest District Office

Pretreatment Compliance Inspection Report

Section A: National Data System Coding					
Permit #	**NPDES#**	**Month/Day/Year**	**Inspection Type**	**Inspector**	**Facility Type**
1DP00044*BP	OHP000187	07/14/2009	I	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	**Entry Time**	**Permit Effective Date**
Hartzell Manufacturing Company, Inc. 2533 Technical Drive Miamisburg, Ohio 45342	9:00 am	11/01/2008
	Exit Time	**Permit Expiration Date**
	9:30 am	10/31/2013
Name(s) and Title(s) of On-Site Representatives	**Phone Number(s)**	
Dave Vickroy, President Mike Alspaugh	937.859.5955	
POTW Receiving Discharge	**Categorical Standard(s) or Other Classifcation**	
City of Miamisburg WWTP	40 CFR 433.17	

Section C: Areas Evaluated During Inspection (S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated)				
M	Pretreatment			

Section D: Summary of Findings (Attach additional sheets if necessary)

See attached report.

Inspector	Reviewer
7/23/09	7/24/09
Marianne Piekutowski Division of Surface Water Southwest District Office Date	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: ***Hartzell Manufacturing Co., Inc.***

Date of inspection: ***July 14, 2009***

OH Number: ***OHP000187***

IDP Number: ***1DP00044*BP***

Facility Representative: ***David Vickroy, Mike Alspaugh***

Inspector(s): ***Mari Piekutowski***

COMPLIANCE

1. Date of last pretreatment inspection: ***July 17, 2008***

2. Has the facility been in compliance with its permit limits since the last inspection? ~~Y~~ / **N**
   If no, explain:

There was TTO sampling submitted for the second half of 2008, but not the first half of 2009. The facility must submit a Toxic Organics Management Plan (TOMP) in order to certify for this parameter. The TOMP Guidance is being included with this report. The reports need to be in micrograms per liter not milligrams per liter. This report will also serve as the Notice of Violation for these items.

3. Is the facility in compliance with all other requirements?
   Sampling procedures **Y** / ~~N~~ / ~~NA~~
   Reporting (late reporting, failure to report, etc) ~~Y~~ / **N** / ~~NA~~
   Compliance schedules ~~Y~~ / ~~N~~ / **NA**
   Submitted BMR and 90 day compliance reports ~~Y~~ / ~~N~~ / **NA**
   Any other requirements ~~Y~~ / ~~N~~ / **NA**

   If any of the above five answers is no, explain:

4. Was the facility required to perform any actions as a result of the last inspection? **Y** / ~~N~~
   Explain any unresolved actions:

The facility only sampled once for TTOs. This must be done twice a year, or a TOMP must be submitted and approved so the facility can certify they are not being discharged. The reports still don't have the correct units. The facility is reporting data that was provided in milligrams per liter as micrograms per liter. Either have the lab provide the results in micrograms per liter, or convert the data.

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: ***40-45***

6. Shifts/Day: ***1***

7. Production Days/Year: ***260***

8. Hours/shift: ***9 (working some overtime)***

9. Any production changes since the last inspection? ~~Y~~ / **N**
   If yes, explain:

10. General facility description and operations:

Job shop metal fabricator. Provide phosphating, gold irriditing, powder coating and painting services for metal equipment, control boxes, and a variety of other parts.

FACILITY OPERATIONAL CHARACTERISTICS (CONTINUED)

11. Any change in materials used in production since the last inspection? ~~Y~~ / **N**
If yes, explain:

The chemicals used at the facility include iron phosphating, detergents, mild phosphoric acid, alodine, and trichloroethylene in the vapor degreaser. The facility is has reduced the amount of Alodine 5200 (chromate) used, and is using a non-chrome clear conversion sealer (Alodine 5900). There is a welder at the facility that has been placed on a the closed loop chiller so it no longer discharges.

12. Any expansion or production increase expected within the next year? ~~Y~~ / **N**
If yes, explain:

WASTEWATER TREATMENT

13. Provide a schematic diagram and description of the wastewater treatment system:

There is no pretreatment system. When the concentrate tanks are dumped, the soap and acid tanks are dumped at the same time for purpose of neutralization.

14. Was a PTI issued for the treatment system? ~~Y / N~~

15. Were there any modifications to the treatment system since the previous inspection? ~~Y / N~~

If yes, was a PTI obtained? ~~Y / N~~

PTI Number: Date:

16. What is the treatment mode of operation? ~~Batch / Continuous /~~ **Combination**

If batch, list the frequency and duration:
Rinse tanks are discharged as needed. There is a still rinse and a pressure rinse that discharge to a trench drain in the room. The gold irriditing is not discharged. The iron phosphate tank is discharged with the soap tank to self-neutralize. This is done approximately three times a year.

17. Who is responsible for operating the treatment system?
NA

18. How often is the treatment system checked?

NA

19. Is there an alarm system for the system? ~~Y / N~~
Explain:

20. Is there an operations and maintenance manual? ~~Y / N~~

21. Is an inventory of critical spare parts maintained? ~~Y / N~~
If yes, list:

22. Are there any bypasses in the system? ~~Y / N~~
If yes, describe the location:

Have bypasses occurred since the last inspection? ~~Y / N~~

Was the POTW notified? ~~Y / N~~

23. Are residuals or sludges generated? Y / ~~N~~

Method of disposal:

Clean out the chromating (alodine) tank infrequently. The chrome is treated and precipitates out, and this leaves a dry sludge. This would be done every four to five years.

Frequency and amount of disposal:

There has not been enough generated for disposal.

Name of hauler/landfill/disposal facility:
Parts Cleaning Technology takes the trichloroethylene from the vapor degreaser, and would be used for all waste disposal. The facility has also added a distilling for this. The volume for disposal is down due to the still and the reduction in the usage.

Is any sludge generated subject to RCRA regulations? Y / ~~N~~

If land applying sludge, is there a sludge management plan? ~~Y / N~~

PROCESS AND WASTEWATER INFORMATION

24. List all processes generating wastewater, current wastewater flows, and where applicable, production rates as well as values on which the permit limits are based:

REGULATED PROCESS	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
	End-of-Pipe	Permit	Current	Permit	Current
Phosphating & Irriditing		--	*3,500*		
Total Regulated Process Flow			*3,500*		
Non-Contact Cooling			--	*There is a rooftop mounted closed loop chiller.*	
Blowdown			--		
Reverse Osmosis			--		
Demineralizer Regeneration			--		
Filter Backwash			--		
Compressor Condensate			--		
Storm Water			--		
Other Dilute Flows			--		
Unregulated Flows (provide list)			--		
Sanitary			*950*		
TOTAL FLOW			*4,450*		

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).

The facility has received coverage under the 'No Exposure" certification for its storm water.

SELF MONITORING

26. Sample location(s) described in the facility's permit:

The manhole/cleanout located fifty feet north of the edge of the fabrication/office side building.

27. Is the facility sampling at the location(s) described in the permit? **Y / ~~N~~**
    If no, describe the actual location:

28. Is the location(s) where the facility is sampling representative? **Y / ~~N~~**
    If no, indicate a representative location:

29. Is the flow measured or estimated? **~~Measured~~ / Estimated**

    If measured, how often is the meter calibrated?

    If estimated, describe method of estimation:
Based on the facility's water bill.

30. Is pH monitored continuously? **~~Y~~ / N**
    If yes, how often is the meter calibrated?

31. Does the facility collect its own samples? **~~Y~~ / N**
    If no, specify the sample collector:

Belmont Laboratories

32. Are appropriate sampling procedures followed?
    Monitoring frequencies **Y / ~~N~~**
    Sample collection (grab for pH, O&G, CN, phenols, VOCs) **Y / ~~N~~**
    Flow proportioned samples ***Samples are time composited.*** **Y / ~~N~~**
    Proper preservation techniques **Y / ~~N~~**
    Sample holding times **Y / ~~N~~**
    Chain-of-custody forms **Y / ~~N~~**

33. Are samples analyzed in accordance with 40 CFR 136? **Y / ~~N~~**

34. Laboratory conducting analyses:

Belmont Laboratories

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? Y / ~~N~~
If yes, identify organics:

Trichloroethylene

36. Does the facility have a current toxic organic management plan(TOMP)? ~~Y~~ / **N**

If yes, is it being implemented? ~~Y / N~~

37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: ~~Y~~ / **N**

38. Does the facility need a spill prevention plan or slug discharge control plan? ~~Y~~ / **N**

If yes, does the facility have a written plan? ~~Y / N~~

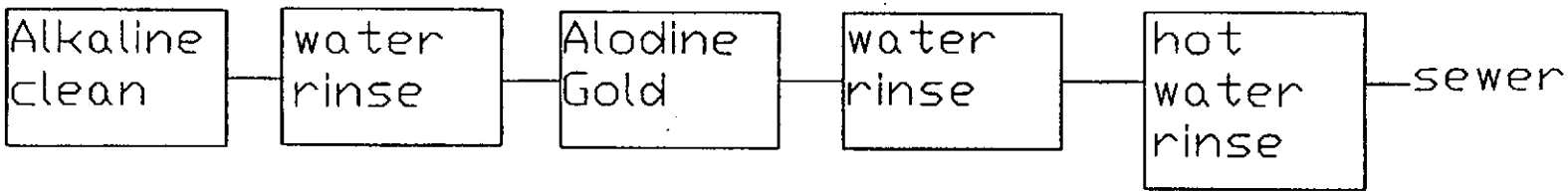
39. Identify any potential slug load or spill areas:

None noted.

REQUIRED FOLLOW-UP ACTIONS

1) ***Hartzell Manufacturing must submit a Toxic Organics Management Plan (TOMP) or sample twice a year for Total Toxic Organics (TTOs). This should be submitted as soon as possible to coincide with the permit renewal.***
2) ***Hartzell Manufacturing must report the sampling data in micrograms per liter (ug/L) not milligrams per liter (mg/L).***

Gold Alodine



Iron Phosphatizing

Ohio EPA Policy	Pretreatment and National Pollutant Discharge Elimination System: Toxic Organics Management Plan	
DSW-0100.008 DSW-0500.008 **Final**	Statutory references: ORC 6111.03; ORC 6111.042 Rule references: 40 CFR Parts 413, 433 and 469; OAC 3745-3; OAC 3745-33; OAC 3745-36.	Ohio EPA, Division of Surface Water Revision 0, January 30, 1988 Revision 1, February 23, 1989 Revision 2, August 23, 2002 Revision 3, December 21, 2006
THIS POLICY DOES NOT HAVE THE FORCE OF LAW Pursuant to Section 3745.30 of the Revised Code, this policy was reviewed on the last revision date.		

History

This document was originally published on January 30, 1988, addressing only the NPDES program. It was incorporated into the Division of Water Pollution Control Policy Manual in August 1988 as policy number 1.08. It was revised on February 23, 1989. On September 30, 1999, the Division of Surface Water published its Policy Manual and Guidance Manual. At that time, this document was considered guidance material and was published in the Guidance Manual as Permit Guidance 4. The current review of this document has expanded it to address the pretreatment program and to incorporate additional information on pollution prevention. This review has also concluded that this document belongs in the Policy Manual. As a result, this document is published in the NPDES section of the Policy Manual as DSW-0100.008 and in the Pretreatment section of the manual as DSW-0500.008.

Purpose

The purpose of this policy it to provide clarification to staff and the regulated community regarding the types of information needed to implement the Total Toxic Organics (TTO) monitoring alternative available under 40 CFR Parts 413, 433 and 469.

Background

Federal categorical standards for Electroplating (40 CFR Part 413), Metal Finishing (40 CFR Part 433) and Electrical and Electronic Component Manufacturing (40 CFR Part 469) provide for an alternative to total toxic organics (TTO) monitoring. In lieu of periodic monitoring, the entity has the option to implement a toxic organics management plan that is acceptable to the control authority and submit a statement (to be included with the periodic monitoring reports) certifying that concentrated toxic organics have not been discharged during the reporting period and that the facility is implementing its toxic organics management plan.

Applicability

This policy is applicable to industries regulated by the Electroplating (40 CFR 413), Metal Finishing (40 CFR 433) or Electrical and Electronic Component Manufacturing (40 CFR 469) categorical standards that discharge to surface waters or POTWs, for which Ohio EPA is the Control Authority. These categorical standards allow certification as an alternative to TTO monitoring.

Toxic Organics Management Plan (TOMP)

A. In accordance with 40 CFR 413.03, 433.12 and 469.13, an acceptable TOMP must specify the toxic organic compounds used, the method of disposal used (instead of discharge into wastestreams) and procedures for ensuring that toxic organics do not routinely spill or leak into wastewater discharged to the POTW or surface waters. A TOMP should include the following information.

   1. A complete inventory of all toxic organic chemicals in use or identified through sampling and analysis of the wastewater from regulated process operations. Organic constituents of trade-name products should be obtained from the supplier.

   2. A pollution prevention assessment for TTOs.

   3. A description of the methods of disposal other than discharge to wastewaters, such as reclamation, contract hauling, or incineration.

   4. The procedures for ensuring that the regulated toxic organic pollutants do not spill or routinely leak into process wastewaters, floor drains, noncontact cooling water, groundwater, surface waters, sanitary sewers or any other location which allows the discharge of the compounds.

   5. The identities and determinations or best estimates of approximate quantities of toxic organic pollutants used in and discharged from the regulated processes. Compounds present in the wastestreams that are discharged to sanitary sewers or surface waters may be a result of regulated processes or disposal, spills, leaks, rinse water carryover, air pollution control, and other sources.

B. Initial Sampling. All toxic organic compounds, as indicated on the list included in the appropriate categorical standard, should be sampled and analyzed; however, industries in the Electroplating and Metal Finishing categories may sample for only those toxic organics present if demonstrated to Ohio EPA's satisfaction that only certain toxic organic compounds are present (See 40 CFR 413.03 and 433.12). This can be demonstrated by providing Material Safety Data Sheets or other information from the supplier, or by providing an accurate inventory of organics on the premises. Ohio EPA requests that it be provided the reporting form from the laboratory analyzing the sample.

C. Certification Eligibility. In order to qualify for the certification alternative, the following criteria should be met:

   1. The baseline analysis should show compliance with the appropriate TTO standards;

   2. An acceptable TOMP must be submitted (See 40 CFR 413.03, 433.12 and 469.13); and

   3. The following certification statement must be signed by an officer of the company or manager responsible for overall plant operations, and submitted with the TOMP

and each subsequent periodic compliance report: (See OAC 3745-3-06(F) and 40 CFR 413.03, 433.12 and 469.13)

> "Based on my inquiry of the person or persons directly responsible for managing compliance with the standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no discharge or dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the control authority."

D. Certification Re-evaluation. At least every five years, the TOMP should be updated and the regulated waste stream should be sampled and analyzed for the required TTOs or those toxic organic compounds expected to be present (those in the Electrical and Electronic Component Manufacturing category must sample for all toxic organics included on the list in 40 CFR 469 (40 CFR 469.13).

E. Revocation of Certification Eligibility. The certification eligibility may be revoked if independent sampling reveals violations or results inconsistent with the values reported by the entity or for other cause.

Furthermore, if any production process is modified, or if conditions change that affect the use and/or storage of toxic organics, Ohio EPA should be notified. Ohio EPA may require that additional sampling be performed.

Toxic Organic Management Plan Procedures

The TOMP is submitted only when certifying for TTO. The TOMP is not intended to supersede any local, state, or federal regulation. Many of the TOMP requirements and elements may already be required for other regulations, especially RCRA (40 CFR 262, 264 and 265), the "Emergency Planning and Community Right-To-Know Act", Title III of the Superfund Amendments and Reauthorization Act (SARA) and environmental certifications like ISO 9001 or ISO 14001. The TOMP objective is to provide assurance that toxic organics are properly used, minimized and/or otherwise disposed of instead of being discharged to surface waters/sewers.

The following areas should be addressed in a TOMP.

A. Organic Inventory.

1. List all toxic organic chemicals used, generated, or stored at your facility. Estimate the maximum daily amount and the average daily amount of toxic organics stored at your facility. For a list of regulated total toxic organics (TTO), consult the following sources:

Electroplating	40 CFR 413
Metal Finishing	40 CFR 433
Electrical and Electronic Components	40 CFR 469

2. Trade names are not acceptable because specific toxic organics used must be specified (40 CFR 413.03, 433.12 and 469.13). The applicant should consult material safety data sheets and/or technical bulletins for the organic constituents. Materials safety data sheets or technical bulletins should not be submitted in lieu of listing the organic constituents, unless specifically requested by Ohio EPA.

3. The above information may be given in tabular form. For example:

Organic Inventory - Storage

Product Name	TTO Constituent	Max. Daily Amt.	Min. Daily Amt.
Easy Clean	Toluene	110 gals.	55 gals.

B. TTO Analysis.
The following steps should be taken to evaluate the wastewater:

1. Collect samples and have analysis done using USEPA approved methods, see 40 CFR 136;

2. Ohio EPA should receive a copy of the reporting form from the laboratory analyzing the wastestream samples;

3. The step(s) in the regulated process in which toxic organics are used should be described;

4. The source where toxic organics could be introduced into the wastestream besides number 3 above (e.g., floor drains) should be described;

5. A flow schematic showing all of the sources and pathways where toxic organics could enter the wastestream should be provided;

6. The approximate quantities (e.g., gallons/day) of each toxic organic chemical used at each step in the regulated process should be listed; and

7. Evaluate any regulated TTO found in the effluent, but not on the TTO inventory listed in part A and determine if they are formed as reaction products or by-products, raw materials, impurities, equipment corrosion or other sources.

C. Pollution Prevention Assessment.
Evaluate pollution prevention options that could be implemented to minimize or eliminate the discharge of toxic organics introduced into the wastestream. These options include, but are not limited to, the following.

1. Material Substitution - Evaluate replacing existing toxic organic materials with non-toxic organic materials. Non-toxic materials may not be covered under the regulated TTO parameter list and will vastly simplify TOMP preparation requirements. Substitutes for toxic organics are available for many cleaning, metal working and coating applications. For example, aqueous cleaners and other non-

toxic organic materials may be effective replacements for cleaning solvents containing regulated organics. Alternative coatings for painting that do not contain toxic organics, such as water-based coatings, may also be a viable option.

2. Improved Operating Practices - Evaluate practices to eliminate or minimize the use or loss of toxic organics that are discharged to the wastestream. For example, consider implementing sound inventory control practices to reduce loss of toxic organics due to poor storage practices. These practices include using toxic organics prior to shelf-life expiration and storing toxic organics according to manufacturers' recommendations to prevent degradation or contamination. Consider implementing appropriate procedures and training staff to ensure that minimal amount of toxic organics are used to do a task. For example, consider manual precleaning methods (such as wiping or brushing) prior to using solvents containing toxic organics. Evaluate process control options (including monitoring for specific gravity, conductivity, pH, biological activity, etc.) for minimizing toxic organics loss to the wastestream from poor management of metal working fluids.

3. Technology Changes - Evaluate new technologies and improved equipment to eliminate or minimize the use or discharge of toxic organics. New technologies may eliminate toxic organic use completely and vastly simplify TOMP preparation requirements. For coating activities, consider technologies such as powder coating and ultraviolet (UV) curable coating. To reduce toxic organic loss from coating activities such as painting, consider improved transfer efficiency using electrostatic spraying or high volume low pressure (HVLP) spraying. For cleaning, consider technologies such as aqueous cleaning systems and media blasting (dry ice, plastic, abrasives, etc.).

4. Recycling - Evaluate recycling opportunities for toxic organics. Environmentally sound recycling practices for toxic organics will help prevent material loss and reduce raw material costs. Cleaning solvents containing toxic organics can be recovered for reuse using solvent distillation. Metal-working fluids and wastewater from paint water curtains, which may contain toxic organics, can be recovered using recycling equipment such as filtration and centrifugation. Other recycling opportunities could include using waste exchanges to find buyers for unwanted toxic organics.

Once the pollution prevention opportunities are identified, a technical and economic evaluation of viable options should be conducted to select options/projects that are technically and economically feasible. Management commitment and funding should be secured for the selected options/projects and a schedule of implementation should be developed. Finally, a measurement system to track the success of the implemented project should be developed and adjustments made to it on an ongoing basis, as needed.

For additional assistance with these and other pollution prevention options and facility pollution prevention assessments, contact the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP) at (614) 644-3469 or visit OCAPP's Web site at http://www.epa.state.oh.us/ocapp/ocapp.html.

D. Methods of Disposal.
A review of the methods of disposal should include the following:

1. A description of the waste(s) being generated;

2. Information on the amount of waste being disposed and the frequency of disposal;

3. Information on the method(s) of disposal (i.e., surface impoundment, direct discharge, sanitary sewers, incineration, reclamation or contract disposal);

4. The name of the contractor(s);

5. An estimation of the maximum daily amount and the average daily amount of waste stored at your facility;

6. The above information may be given in tabular form. For example:

Waste Type	Waste Disposal Amount/Frequency	Disposal Method	Contractor	Waste Storage Max. Daily/Ave. Daily
Waste Paint (F003)	10 drums 2/yr.	Incineration	ABC Inc.	10 drums/3 drums

7. The facility's RCRA generator number, if any; and

8. A description of the storage of waste generated awaiting disposal. This should include, but is not limited to, location of storage (preferably indoors or a roofed area), the duration of storage, and the types of waste being stored (includes solvent soaked rags and absorbents). The storage area should be designed and maintained to not allow leakage.

E. Practices to Ensure that Spills or Leaks do not Routinely Occur.
The following information is generally sufficient:

1. A description of the practices to be followed, including housekeeping procedures, during the use, collection, and storage of organics to ensure that organics do not spill or leak. These practices should include, but are not limited to:

   a. proper labeling and handling containers of toxic organics;
   b. storing a minimal amount of organics at the site;
   c. a centralized storage area (preferably indoors or a roofed area) designed and maintained not to allow leakage;
   d. sealing floor drains when they are in the area where toxic organics are used or stored;
   e. Overfill control equipment (sensors, alarms etc); and
   f. secondary containment system (sump or dike) capable of holding 110 percent of the total volume stored or the volume of the largest container, whichever is greater. The containment system should be designed and maintained not to allow leakage;

2. A description of the procedure that will provide routine and detailed visual inspections to ensure the absence of leaking storage containers (i.e., tanks, drums, pipes, etc); Ohio EPA recommends visual inspections at least once a week;

3. A description of how all employees are trained in the proper use, collection, and storage of all chemicals they work with; and

4. A simple but complete floor plan showing the storage location of toxic organics prior to use and toxic organic waste awaiting disposal. This plan should include all floor drains, dikes, and containment areas in the storage facility.

F. Spill or Leak Notification and Containment Procedures.
The following information is generally sufficient:

1. The name of the individual responsible for implementing the TOMP;

2. The name of your facility's emergency response coordinator;

3. Notification procedures

   a. A list of agencies to be contacted during an emergency and their telephone numbers should be posted where organics are used and stored. This list should include, but is not limited to, the following:

      i. Facility's Emergency Response Coordinator;
      ii. Secondary (or backup) Facility Coordinator;
      iii. Fire Department;
      iv. POTW;
      v. Ohio EPA District Office;
      vi. Ohio EPA Emergency Response Section 1-800-282-9378 (24 hr. phone/7 days a week); and
      vii. Local Emergency Planning Committee (LEPC).

   b. If a spill or leak enters the wastewater and the POTW or surface waters, Ohio EPA district pretreatment/NPDES unit should be promptly notified with the following information:

      i. facility's name;
      ii. receiving POTW or surface water;
      iii. chemical(s) and cause of the spill/leak;
      iv. quantity of the chemical(s);
      v. time and duration of spill/leak; and
      vi. steps taken and/or planned to eliminate and prevent further spills/leaks;

4. A description of practices to be followed in the event of a spill or leak (i.e., containment, cleanup, treatment, disposal, etc.);

5. A description of equipment/supplies on site to contain and clean up spills and leaks; and

Additional Sources of Information

U.S. EPA Guidance Manual for Implementing Total Toxic Organics (TTO) Pretreatment Standards. U.S. EPA, Office of Water. 440-1-85-009-T. September 1985.

Ohio Waste Minimization and Pollution Prevention Planning Guidance Manual. Ohio EPA, Office of Pollution Prevention. September 1993.

For more information contact:

Ohio EPA, Division of Surface Water
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