



Wastewater Discharge Permit Application Instructions

All questions must be answered. **DO NOT LEAVE BLANKS.** If you answer "no" to question E.1., you may skip to Section I. Otherwise, if a question is not applicable, indicate so on the form. Instructions to some questions on the permit application are given below.

SECTION A - INSTRUCTION (GENERAL INFORMATION)

1. Enter the facility's official or legal name. Do not use a colloquial name.
 - a. Operator Name: Give the name, as it is legally referred to, of the person, firm, public organization, or any other entity which operates the facility described in this application. This may or may not be the same name as the facility.
 - c. Indicate whether the entity which operates the facility also owns it by marking the appropriate box:

If the response is "No", clearly indicate the operator's name and address and submit a copy of the contract and/or other documents indicating the operator's scope of responsibility for the facility.
4. Provide the physical location of the facility that is applying for a discharge permit.
5. Provide the mailing address where correspondence from the City may be sent.
6. Provide all the names of the authorized signatories for this facility for the purposes of signing all reports. The designated signatory is defined as:
 - a. A responsible corporate officer if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:
 - (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or
 - (ii) the manager of one or more manufacturing, production or operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second-quarter **1980** dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
 - b. A general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship, respectively.
 - c. The principal executive officer or director having responsibility for the overall operation of the discharging facility if the Industrial User submitting the reports is a Federal, State, or local governmental entity, or their agents.

- d. A duly authorized representative of the individual designated in paragraph (a), (b), or (c) of this section if:
 - (i) the authorization is made in writing by the individual described in paragraph (a), (b), or (c);
 - (ii) the authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the Industrial Discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and
 - (iii) the written authorization is submitted to the City.
 - e. If an authorization under paragraph (d) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of paragraph (d) of this section must be submitted to the City prior to or together with any reports to be signed by an authorized representative.
8. Provide the name of a person who is thoroughly familiar with the facts reported on this form and who can be contacted by the City (e.g., the plant manager).

SECTION B - INSTRUCTIONS (BUSINESS OPERATIONS)

- 1. Check off all operations that occur or will occur at your facility. If you have any questions regarding how to categorize and/or identify your business activity, contact the City for technical guidance.
- 3. For all processes found on the premises, indicate the Standard Industrial Classification (SIC) Code Number, as found in the most recent Edition of Standard Industrial Classification Manual prepared by the Executive Office of the President, Office of Management and Budget. This document is available from the Government Printing Office in Washington D.C., or in San Francisco, California. **DO NOT USE PREVIOUS EDITIONS OF THE MANUAL.** Copies of the manual are also available at most public libraries.
- 4. List the types of products used and/or produced, giving the common or brand name and the proper or scientific name. Enter from your records the average and maximum amounts produced daily for each operation for the previous calendar year and the estimated total daily production for this calendar year. Be sure to specify the daily units of production. Attach additional pages as necessary.

SECTION C - INSTRUCTIONS (WATER SUPPLY)

4. Provide daily average water usage within the facility. Contact cooling water is cooling water that during the process comes into contact with process materials, thereby becoming contaminated. Non-contact cooling water does not come into contact with process materials. Sanitary water includes only water used in restrooms. Plant and equipment washdown includes floor washdown. If sanitary flow is not metered, provide an estimate based on 15 gallons per day (GPD) for each employee.

SECTION E - INSTRUCTIONS (WASTEWATER DISCHARGE INFORMATION)

1. If you answer "no" to this question, skip to Section I; otherwise, complete the remainder of the application.
4. A schematic flow diagram should be completed by a qualified person to ensure accuracy. Assign a sequential reference number to each process starting with No. 1. To determine your average daily volume and maximum daily volume of wastewater flow, you may have to read water meters, sewer meters, or make estimates of volumes that are not directly measurable.
5. Non-categorical users should report average daily and maximum daily wastewater flows from each process, operation, or activity present at the facility. Categorical users should skip to question 6.
6. Categorical users should report average daily and maximum daily wastewater flows from every regulated, unregulated, and dilution process. A regulated wastestream is defined as wastewater from an industrial process that is regulated for a particular pollutant by a categorical pretreatment standard. Unregulated wastestreams are wastestreams from an industrial process that are not regulated by a categorical pretreatment standard (a process not checked in Section B. 1) and are not defined as a dilution wastestream. Dilution wastestreams include sanitary wastewater, boiler blowdown, non-contact cooling water or blowdown, stormwater streams, demineralizer backwash streams and process wastestreams from certain industrial subcategories exempted by EPA from categorical pretreatment standards. (For further details see 40 CFR 403.6 (e).)
7. Total Toxic Organics (TTO) means the sum of the masses or concentrations of specific toxic organic compounds found in the industrial user's process discharge. The individual organic compounds that make up the TTO value and the minimum reportable quantities differ according to the particular industrial category (For more information see applicable categorical pretreatment standards, 40 CFR Parts 405-471).
 - a. The published list of Toxic Organics is on pages 11 through 14, Section F, numbers 1 through 110.
 - b. A report (such as a BMR) submitted by categorical industrial users which indicates the compliance status of the user with the categorical standard for Total Toxic Organics (40 CFR 403.12(b)). A list of industrial user reporting requirements is in Appendix A.
 - c. Toxic Organic Management Plan - Written plan submitted by industrial users in accordance with some categorical pretreatment standards as an alternative to TTO monitoring which specifies the toxic organic compounds used, the method of disposal used, and procedures for assuring that toxic organics do not routinely spill or leak into wastewater discharged to the POTW. An example of a Toxic Organic Management Plan is in Appendix B.

SECTION H - INSTRUCTIONS (FACILITY OPERATIONAL CHARACTERISTICS)

2. Indicate whether the business activity is continuous throughout the year or if it is seasonal. If the activity is seasonal, circle the months of the year during which the discharge occurs. Make any comments you feel are required to describe the variation in operation of your business activity.
4. Indicate any shutdowns in operation which may occur during the year and indicate the reasons for shutdown.
5. Provide a listing of all primary raw materials used (or planned) in the facility's operations. Indicate amount of raw material used in daily units.
6. Provide a listing of all chemicals used (or planned) in the facility's operations. Indicate the amount used or planned in daily units. Avoid the use of trade names of chemicals. If trade names are used, also provide chemical compounds. Provide copies of all available manufacturer's material safety data sheets for all chemicals identified.
7. A building layout or plant site plan must be completed and certified for accuracy by a qualified and registered professional engineer. Approved building plans may be substituted. An arrow showing North as well as the map scale must be shown. The location of each existing and proposed sampling location and facility sewer line must be clearly identified as well as all sanitary and wastewater drainage plumbing. Number each unit process discharging wastewater to the public sewer. Use the same numbering system shown in the schematic flow diagram. An example of the drawing required is shown in Appendix B.

SECTION I - INSTRUCTIONS (SPILL PREVENTION)

4. Accidental Spill Prevention Plan (ASPP) - A plan prepared by an industrial user to minimize the likelihood of a spill and to expedite control and cleanup activities should a spill occur. An example of an ASPP is in Appendix C.
5. Describe how the spill occurred, what was spilled, when the spill happened, where it occurred, how much was spilled, and whether or not the spill reached the sewer. Also explain what measures have been taken to prevent a recurrence or what measures have been taken to limit damage if another spill occurs.

SECTION J - INSTRUCTIONS (NON-DISCHARGED WASTES)

1. For wastes not discharged to the City's sewer, indicate types of waste generated, amount generated, the way in which the waste is disposed (e.g., incinerated, hauled, etc.), and the location of disposal.
2. On-site disposal system could be a septic system, lagoon, holding pond (evaporative-type), etc.
4. Provide the names, addresses and permit numbers of all companies that haul waste from the facility.
5. Types of permits could be: air, hazardous waste, underground injection, solid waste, NPDES (for discharges to surface water), etc.

SECTION L - INSTRUCTIONS (AUTHORIZED SIGNATURES)

For a definition of an authorized representative, see the instructions for Section A, question 6 on page 1 of this document.

APPENDIX A

INDUSTRIAL USER MANAGEMENT PRACTICES

Industrial user management practices are measures undertaken by industrial users to prevent or minimize the potential for release of pollutants in significant amounts to the sewer system. Industrial user management practices used by industries for preventing spills or slug loads to the Publicly Owned Treatment Works (POTW) are essentially the same as those typically used for safety, industrial hygiene, fire protection, protection against loss of product, insurance company requirements and public relations. Industrial user management practices typically address the following sources of pollution.

- * Toxic and hazardous chemical spills and leaks.
- * Plant site runoff.
- * Sludge and waste disposal.
- * Drainage from material storage areas.
- * Other "good housekeeping" practices.

Industrial user management practices are grouped into two general categories: baseline and advanced. Both baseline and advanced industrial user management practices can include the following types of management practices:

- * Establishment of a Slug Control Committee responsible for implementation and maintenance of an industry's slug loading control plan to prevent slug discharges to the POTW.
- * Maintenance of a material inventory system to identify all sources and quantities of toxic and hazardous materials handled and produced within the industrial user's facilities.
- * Establishment of employee training programs to provide personnel of all levels with a complete understanding of the facility's slug loading control plan or toxic organics management plan.
- * Establishment of preventive maintenance procedures to inspect plant equipment and other systems to discover conditions that could cause production breakdowns or harmful deterioration of systems, and the correction of such conditions through adjustment, repair or replacement of worn parts before equipment or system failure results in spills.
- * Conducting routine visual inspections that consist of tours or patrols throughout the plant facilities to detect spills or evidence of conditions that could lead to slug loading.

- * Improvement of good housekeeping practices essential to the maintenance of a clean and orderly working environment.
- * Evaluation of the compatibility of chemicals and other materials with the containers in which they are stored, with other materials with which they are mixed, the compatibility of the container with the environment, and adjustment of material storage or handling practices accordingly.
- * Establishment of a security system to prevent accidental or intentional entry into the plant that could lead to a chemical release.
- * Use of a slug loading reporting system to maintain records for the purpose of reporting slug loading, studying slug loading recurrence, expediting mitigation or cleanup activities, and complying with legal requirements.

Baseline management practices are:

- * Generally applicable to all industries
- * Relatively low in cost and simple to implement
- * Not directed to particular pollutant compounds

Advanced industrial user management practices, on the other hand, are used in addition to baseline management practices to provide a further level of protection for preventing and controlling chemical releases. Advanced industrial user management practices are specific to groups of toxics and hazardous substances and can be divided into the following four categories of management practices:

- * Prevention practices including monitoring systems, nondestructive testing, labeling, covering or enclosing materials, equipment or process operations, and other techniques used to prevent material spills.
- * Containment practices used to contain or capture releases of materials within the industrial premises.
- * Mitigation practices for the cleanup and treatment of spill materials.
- * Ultimate disposition practices for the proper disposal of spilled materials.

The City may choose to require implementation of one or more of the management practices discussed above. Management practices or programs should be designed and tailored for each industrial user's individual situation. The requirements for implementation can be incorporated into the special conditions section of an industrial user's permit.

TABLE 8-5. INDUSTRIAL USER REPORTING REQUIREMENTS
PER 40 CFR 403.12

Required report and citation	Report due date	Purpose of report	Information required
Baseline Monitoring Report (BMR) 40 CFR 403.12 (b)(1-7)	Within 180 days of effective date of the regulation or an administrative decision on category determination	<ul style="list-style-type: none"> • To provide baseline information on industrial facility to the City • To determine wastewater discharge sampling points • To determine compliance status with categorical pretreatment standards 	<ul style="list-style-type: none"> • Identifying information about the facility (name, address, etc.) • List of all environmental control permits issued to the facility • Description of operations • Flow measurements of wastewater discharges to the POTW • Nature and concentration of pollutants discharged to the POTW • Certification of compliance status with categorical pretreatment standards • Compliance schedule to attain compliance • Certification of validity of information provided
Compliance schedule progress reports 40 CFR 403.12(c)(1-3)	Within 14 days of each milestone date on the compliance schedule; at least every 9 months	<ul style="list-style-type: none"> • To track progress of industrial facility through the duration of a compliance schedule 	<ul style="list-style-type: none"> • Compliance with appropriate increment of compliance schedule • Reasons for any noncompliance • Actions taken to return to the approved schedule
90-day compliance report 40 CFR 403.12(d)	Within 90 days of the date for final compliance with applicable categorical pretreatment standards; for new sources, the compliance report is due within 90 days following commencement of wastewater discharge to the POTW	<ul style="list-style-type: none"> • To notify the City as to whether compliance with the applicable categorical pretreatment standards has been achieved. • If facility is noncompliant, to specify how compliance will be achieved 	<ul style="list-style-type: none"> • Nature and concentration of all pollutants regulated by categorical pretreatment standards • Average and maximum daily flow for regulated manufacturing processes • Compliance status (if noncompliant, additional measures needed)

TABLE 8-5. INDUSTRIAL USER REPORTING REQUIREMENTS
PER 40 CFR 403.12
(Continued)

Required report and citation	Report due date	Purpose of report	Information required
Periodic compliance reports 40 CFR 403.12(e)	Every June & December after the final compliance date (or after commencement of a discharge for new sources) or as specified by the City	<ul style="list-style-type: none"> • To provide the City with current information on the discharge of pollutants to the POTW from categorical industries 	<ul style="list-style-type: none"> • Nature & concentration of all regulated pollutants • Average & max. daily flows discharged to the POTW for the reporting period • Where mass based units are used, a measure of the mass of pollutants discharged • For industries subject to production-based standards an actual average production rate for the reporting period • For industries subject to equivalent mass or concentration limits [limits pursuant to 403.6(C)] a measure of the long term production rate • Certification of validity of info provided • Additional info as required by the City
Notice of Slug Loading 40 CFR 403.12(f)	Notification of POTW immediately after occurrence of slug load or any other discharge that may cause problems to the POTW	<ul style="list-style-type: none"> • To alert the POTW to the potential hazards of the discharge 	<ul style="list-style-type: none"> • None specified in General Pretreatment Regulations; other federal, state, and local regulations may address reporting requirement
Noncompliance Notification 40 CFR 403.12 (g)(2)	Notification of POTW within 24 hours of becoming aware of violations	<ul style="list-style-type: none"> • To alert the POTW of a known violation and potential problems which may occur 	<ul style="list-style-type: none"> • Nature & magnitude of the violations • Other information as determined by the POTW
Periodic compliance reports for non-categorical users 40 CFR 403.12(h)	To be determined by the POTW	<ul style="list-style-type: none"> • To provide the POTW with current information on the discharge of pollutants to the POTW from industrial users not regulated by categorical standards 	<ul style="list-style-type: none"> • Information as determined by the POTW
Notification of Changed Discharge 40 CFR 403.12(j)	In advance of any substantial changes in the volume or character of pollutants in the discharge	<ul style="list-style-type: none"> • To notify the POTW of anticipated changes in wastewater characteristics and flow which may affect the POTW 	<ul style="list-style-type: none"> • All anticipated changes which may affect the character or volume of the discharge

APPENDIX B

TOXIC ORGANICS MANAGEMENT PLAN ABC REFRIGERATION CORPORATION HIGH POINT PLANT

I. Description of Facilities and Solvent Use

A. Process Description

The ABC Refrigeration Corporation, High Point Plant, manufactures automotive radiators, condensers and compressors from metal coils and metal castings manufactured by other suppliers. The forming and assembly processes include metal forming, degreasing, chromating, and brazing in preparation for painting and final assembly. The metal castings are machine-washed, assembled, and degreased prior to final assembly.

Wastewater types and volumes and the current wastewater treatment system are depicted in Figure 1. The primary sources of process wastewater are the degreasing, chromating, fluxing, and parts washing operations. Other sources of wastewater are cooling tower blowdown and boiler blowdown. Wastewater from the degreasing operations is treated by dispersed air flotation for oil and grease removal and then discharged to a combined wastestream containing the wastewater from all other sources. The combined wastestream is then treated by coagulation/flocculation with chemical and polymer addition for solids and metals reduction. The treated effluent is discharged to the city sewer system.

B. Identification of Toxic Organic Chemicals Entering the Plant Wastewaters

1. Chemical Analysis of Treated Wastewaters

Samples were taken of the plant's treated wastewaters for analysis for the 110 toxic organics regulated under the metal finishing categorical pretreatment standards. Samples collected were 24-hour flow proportioned composite samples for acid extractable and base/neutral compounds. Grab samples for volatile organics were taken every four hours and were composited before analysis. Samples were taken over a period when all production lines were operating at peak production rates. Samples were analyzed by gas chromatography with compound identification and quantification by mass spectrophotometer (GC/MS). EPA procedures 624 and 625 were followed for GC/MS analysis. Toxic organic compounds detected at concentrations greater than 0.01 mg/l are listed in Table 1.

Table 1

<u>Compound</u>	<u>Concentration (mg/l)</u>
1,1,1-trichloroethane	1.320
Naphthalene	0.210
Chloroethane	0.131
Benzene	0.532
Phenol	0.681

2. Identification of Solvents Used in Manufacturing Operations

- a. Greasefree is a degreasing solvent used in the forming process. Greasefree's principle ingredient is 1,1,1-trichloroethane. We have contacted the manufacturer of Greasefree, Doubt Chemical Corporation, who informs us that their analysis of Greasefree indicates that no other priority toxic pollutants are contained in Greasefree. Doubt's letter confirming its analysis is enclosed as Attachment 1.
- b. Rinsewash is a degreasing solvent used in the metal castings process. Rinsewash is a multicomponent solvent we purchase from Pound Chemical Corporation. At our request, Pound has analyzed Rinsewash and found it contains naphthalene, benzene and phenol. Pound represents that no other toxic organic pollutants were identified in its analysis of Rinsewash. Pound's letter documenting its analysis is enclosed as Attachment 2.
- c. Rustaway is a corrosion inhibitor used during the metal castings washing process to prevent rust formation. We buy Rustaway from the Exit Chemicals Corporation. The primary ingredient of Rustaway is carbon disulfide. Exit refused our request for a chemical analysis of Rustaway. We, therefore, submitted an aliquot of Rustaway to Whatsinit Laboratories, Inc. for analysis. Whatsinit's report is enclosed as Attachment 3 and documents that Rustaway contains chloroethane. No other toxic organics were detected.

3. Identification of Other Potential Sources of Toxic Organic Pollutant Introduction to the Wastewater Treatment System

- a. Durable Paints are used to finish the forming process items. Although not detected in the wastewater analysis, Durable Paints are known to contain toluene. The floor drains in the forming process painting area discharge to the wastewater treatment system; therefore, any spilled paint would enter the process wastewater treatment system.
- b. Degreasing Areas - Floor drains in both degreasing areas similarly are connected to the main wastewater system; therefore, spills of degreasing agents could enter the treatment system.
- c. Solvent Storage Areas - Solvents, paints, and corrosion inhibitors are stored in bulk quantities in four different areas of the plant - the two degreasing areas, the washing area, and the painting area. Spills could occur by accidental dumping, spillage during routine transfer, etc. Such spills would enter the wastewater treatment system through the floor drains.

II. Description of Control Options Explored

A. Solvent Substitution

For the degreasing, corrosion inhibitor, and painting sources of toxic organics, ABC explored the feasibility of substituting another product that does not contain toxic organic materials. Obviously, this would be the most effective manner of eliminating toxic organic discharges both from process operations and from potential spillage into floor drains. ABC obtained samples of degreasing agents, corrosion inhibitors, and paints that do not contain toxic organics from vendors and conducted pilot tests of their effectiveness. ABC concluded after these tests that the alternative degreasing agents and paints could not be used without adversely affecting the process and final products. The alternative degreasing agents were not nearly as effective as the ones currently used and, therefore, would impair the effectiveness of subsequent operations. Alternative paints could not be applied evenly to our products. One alternative corrosion inhibitor, Chromisorb, appears to be an acceptable alternative to the Rustaway and contains the toxic metals zinc and chromium. Thus, the option of eliminating chloroethane discharges by substituting Chromasorb for Rustaway as a corrosion inhibitor was considered.

B. Process Modifications

The major alternative to the substitution of degreasing agents is to institute changes in the degreasing process that do not result in wastewater discharge. This would be accomplished by wiping parts rather than rinsing them. After a thorough wipedown, parts would be air dried in an area under a vacuum hood. The vacuum hood is integrated with the facility's air pollution control devices. Any material used for wiping would, of course, be treated as a hazardous material. It would be transferred to drums and disposed of by a licensed disposer or reclaimer. Thus, process changes could be made that would eliminate discharge of process wastewaters containing 1,1,1-trichloroethane, naphthalene, benzene and phenol. Solid waste generation would, of course, increase.

C. Segregated Drain System

Spills of toxic organics could be eliminated from the process wastewater stream if a segregated floor drain system were constructed. ABC investigated this option and found that, because of the location of some existing drain pipes, such modification would require a major disruption of the plant and would cost far more than routine TTO monitoring. Moreover, such an option would create a significant additional wastewater treatment problem for those cases in which drain water is contaminated by spilled material.

D. Sealing Floor Drains

Introduction of toxic organics to wastewaters through floor drains could be eliminated if floor drains were sealed. In the process areas this option is not feasible because of State safety requirements. In storage areas, however, such an option may be practical.

E. Installing Sumps in the Floor Drains

Under this option sumps would be installed such that prior to entering the drain, floor waters would pass through a sump or holding tank. The sump would be as large as the largest spill of solvent reasonably expected plus a 10 percent freeboard allowance. Thus, if a solvent spilled, the discharge to the drain would be turned off. The solvent could then collect in the sump and be recovered.

III. Toxic Organic Management Plan

As a result of the above analyses, ABC believes that all of its toxic organic pollutant discharge can be controlled by a toxic organic management plan in lieu of routine toxic organic monitoring.

A. Solvent Substitution

Discharge of chloroethane will be eliminated by use of a substitute rust inhibitor. ABC will discontinue use of Rustaway as a rust inhibitor. Instead, ABC will use Chromasorb to prevent rust formation in its metal casting line. Chromasorb is a zinc-chromate rust inhibitor that can be used to prevent rust formation in place of Rustaway. Chromasorb contains the toxic metals chromium and zinc. The existing wastewater treatment system, however, is designed to remove metallic pollutants. By adjustment of the chemical and polymer feed, ABC anticipates that it can maintain current levels of metals discharge while eliminating chloroethane discharges.

B. Process Changes

ABC will eliminate discharge of process wastewaters containing 1,1,1-trichloroethane, naphthalene, benzene, and phenol by instituting changes in the degreasing process. Solvent cleaning will be accomplished by immersion and manual wipedown. Parts will be allowed to air dry in an area covered by a vacuum hood prior to any water washing. Materials used for wipedown will be collected in drums, sealed, stored in a secure area and transferred to Useitagin Reclamation Company. Useitagin is a licensed hazardous waste disposer.

C. Solvent Storage Procedures

Storage procedures for all solvents containing toxic organic compounds will be changed. Storage will be in a central location for all such materials, including paints. The storage area will be diked to contain a volume equal to the largest container stored, 55 gallons, plus 50 percent. There will be no floor drains in this area.

All incoming containers of solvents or paints will be labeled upon receipt with the following information:

<p>Material Contains Regulated Organic Solvents</p> <ol style="list-style-type: none">1. Use only in designated areas2. Do not permit this material to enter plant wastewater stream3. Dispose of only in designated and identified containers
--

All in-plant usage containers will also be marked with the above information.

D. Installation of Sumps in Process Areas

In all process areas where materials containing toxic organic compounds are used, sumps will be installed prior to any floor drains. The sumps will be designed to allow rapid shut-off of flow to the drain and to hold a volume equal to the largest container of solvent used in that area plus ten percent.

E. Spent Solvent Disposal Practices

Spent solvents are collected in 55 gallon drums, sealed, and stored in an existing, secured storage area. The storage area contains no floor drains. ABC sells spent solvent to the Useitagin Reclamation Company.

F. Training

All personnel involved in degreasing, chromating, painting, and cleanup activities will receive instruction in the proper handling and disposal of solvents and cleanup materials in order to keep regulated toxic organics out of industrial wastewater. New employees will be trained in these procedures immediately. All personnel working in these activities are familiar with this toxic organic management plan and will follow the procedure established in that standard to eliminate regulated organics from entering the water wash system.

Training consists of classroom instruction which reviews the following:

1. The organic solvents and cleaners known to be in use at the plant and the areas in which they are used.
2. The location of lift stations and drains with emphasis upon the location of pretreatment sewer systems for each area in the plant.
3. The Toxic Organics Management Plan and the proper procedures for handling and disposing of the respective solvents.

G. Inspections

1. Degreasers, spray booths, and cleaning operations will be inspected routinely by the area supervisor to verify cleaning procedures and adherence to this Toxic Organics Management Plan to insure that TTO does not spill or leak into plant sewers.
2. Centrally located cleaning and solvent handling, reuse, and collection areas, as well as raw material and waste solvent storage areas, will be inspected weekly by a designated environmental representative to verify proper solvent storage, handling, and collection. A log of inspections and sign-off will be maintained by the designated environmental representative.

H. Implementation

All provisions of this plan will be fully implemented by April 1, 1984.

IV. Certification

"Based on my inquiry of the person or persons directly responsible for managing compliance with the TTO limitations, I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last report. I further certify that this facility is implementing this toxic organics pollutant management plan submitted to the City on January 2, 1984."

John Smith
Plant Manager
High Point Plant
Telephone: (617) 617-6176

APPENDIX C

**ACCIDENTAL SPILL PREVENTION PROGRAM
(ASPP)**

I. GENERAL INFORMATION

Facility Name _____

Address _____

ASPP Plan contact _____

Title _____

Work phone no. _____ After hours phone no. _____

Emergency response contact _____ Title _____

Work phone no. _____ After hours phone no. _____

Secondary contact _____

Title _____

Work phone no. _____ After hours phone no. _____

Type of Business/Manufacturer _____

Operating Schedule _____

(number of shifts and hours of operation for each shift)

Number of Employees: 1st shift: _____ 2nd shift: _____ 3rd shift: _____

Average daily discharge of wastewater (Identify continuous and batch discharges) _____

Identify all categorical pretreatment standards applicable to your facility _____

Description of previous spill events and remedial measures taken to prevent their recurrence _____

Description of security provisions and warning signs at the facility _____

II. FACILITY LAYOUT AND FLOW DIAGRAMS

Attach drawings (suggested no larger than 36" x 50") of the facility which show the following:

General layout of the facility.

Property boundaries.

Entrance and exit routes to facility.

Areas occupied by manufacturing or commercial activities.

Hazardous materials process and storage areas.

Waste handling, storage, and treatment facilities.

Loading and unloading areas.

Direction of drainage from hazardous material and waste handling, process, storage, and treatment areas.

Floor drains, pipes, and channels which lead away from potential leak or spill areas. [Identify by coding, footnotes, or narratives where these drain to (e.g., sanitary sewer, holding tank pumped out by hazardous waste hauler, etc.)].

Flow diagram(s) showing chemical and wastewater flow including piping and instrumentation, flow rates, tanks and capacities, treatment systems and final destinations of flows.

Please provide narrative discussions where needed to clarify any of the above items.

III. Hazardous Materials Data

	<u>Location in Plant</u>	<u>Maximum Volume</u>	<u>Container Volume</u>	<u>Type Container</u> ¹	<u>Remarks</u> ²
1	The facility should provide information on the type of container or tank used (e.g., steel drum, fiberglass carboy, etc.) and the materials of construction of the container or tank.				
2	Remarks should include comments concerning the toxicity or hazards associated with the hazardous materials and any special precautions needed to handle the material properly. The remarks should also include brief discussions of the compatibility of the materials or construction of the container or tank with its contents, the condition of the container, and whether it is open or closed at the top.				

IV. SPILL AND LEAK PREVENTION EQUIPMENT AND PROCEDURES

Equipment

Identify the location and provide a description of all spill prevention structures and equipment employed (such as dikes, berms, sealed drains, alarms, leak detection equipment at the facility, diversionary structures, etc.). Reference to the location should be made with the layout drawings required in the previous section.

Procedures

Discuss all routine operation and maintenance procedures geared to minimize spills and leaks at the facility. Include descriptions of the type and frequency of inspections and monitoring for leaks or other conditions that could lead to spills.

V. EMERGENCY RESPONSE EQUIPMENT AND PROCEDURES

Equipment

Provide an up-to-date list of available emergency response equipment including its location (the location can be indicated on a facility layout) and a physical description. This list of equipment should include the following:

Communication equipment and alarms.

Spill containment and control equipment and tools.

Spilled material storage containers.

Protective clothing and respirators.

First Aid kits.

Decontamination equipment.

Ventilation equipment.

Procedures

Provide a detailed description of procedures to be followed in responding to a spill at the facility. This description should cover the following items:

Notification of facility personnel responsible for responding to spills.

Chain of command for spill response.

Evacuation procedures.

Notification of response agencies and contractors.

Spill assessment and response procedures.

Procedures for preventing contact between incompatible materials.

Procedures for disposing or treating spilled materials.

VI. SPILL REPORTING AND ASPP MODIFICATION PROCEDURES

Describe procedures for reporting spills (attach any forms used) and for modifying the ASPP Plan where procedures were inadequate or where changes at the facility warrant modification.

VII. TRAINING PROGRAM

Outline, in detail, the training program given to employees which will enable them to understand the processes and materials with which they are working, the safety and health hazards, and the procedures and practices for preventing and responding to spills. A discussion of the appropriateness of training provided to each employee or group of employees (e.g., chemical handling personnel, plating department supervisor, etc.) should also be included.

VIII. CERTIFICATIONS

I certify that the information provided in this document is to the best of my knowledge true and that the accidental spill prevention measures described in the document are implemented as described.

Name/Title

Date

I certify that the spill prevention and control equipment installed by the industry will provide adequate protection from accidental spills when used properly.

Name/Title

P.E. Registration No.

Date