

TOMP: Typical Plan Requirements

- **The toxic organic compounds used**
 - **The method of disposal**
- **The procedures to eliminate routine spills/leaks to the POTW**

Typical TOMP Review

	Yes	No		
1. Does Plan have an inventory of toxic chemicals in use?				
2. Has sampling and analysis been performed to identify inventory of toxic organic chemicals?				
3. Has a list of toxic organic chemicals been submitted (in lieu of list, have MSDSs been submitted)?				
4. Are methods of disposal included for all inventoried toxic organic chemicals?				
5. Has an SPCC, PIPP, BMP or Slug Control Plan been submitted identifying that toxic organic chemicals do not spill or routinely leak into process wastewaters, floor drains, non-contact cooling water, groundwater, surface water, etc.?				
6. Has a best estimate of quantities of applicable toxic organic chemicals used in the process been included?				
7. Was the TOMP submitted correctly (i.e., with BMR, etc)?				
8. Does the TOMP have the appropriate certification statement and signature?				
9. Has TOMP been implemented?				

The Toxic Organic Compounds Used:

Require list, NOT copies of material safety data sheets

Provide check-off sheet if possible

COMPANY _____
 DATE _____
 EVALUATOR _____

Indicate Presence ✓	PARAMETER	CAS	Determination Review			
			Analytical	Specification Sheet	MSDS	Other - Describe
	Acenaphthene	83-32-9				
	Acenaphylene	208-96-8				
	Acrolein	107-02-08				
	Aldrin	309-00-2				
	Anthracene	120-12-7				
	Acrylonitrile	107-13-1				
	α-BHC (aka alpha-BHC)	319-84-6				
	β-BHC (aka beta-BHC)	319-85-7				
	γ-BHC (aka gamma-BHC)	58-89-9				
	δ-BHC (aka delta-BHC)	319-86-8				
	Benzene	71-43-2				
	Benzidine	92-87-5				
	Benzo(a)anthracene (aka 1,2-Benzanthracene)	56-55-3				
	Benzo(a)pyrene (aka 3,4-Benzopyrene)	50-32-8				
	Benzo(b)fluoranthene (aka 3,4-Benzofluoranthene)	205-99-2				
	Benzo(ghi)perylene (aka 1,12-Benzoperylene)	191-24-2				
	Benzo(k)fluoranthene (aka 11,12-Benzofluoranthene)	207-08-9				
	Bis(2-chloroethoxy)methane	111-91-1				
	Bis(2-chloroethyl)ether	111-44-4				
	Bis(2-chloroisopropyl)ether	39638-32-9				
	Bis(2-ethylhexyl)phthalate	117-81-7				
	Bromoform (aka Tribromomethane)	75-25-2				
	4-Bromophenyl phenyl ether	101-55-3				
	Butyl benzyl phthalate	85-68-7				
	Carbon tetrachloride (aka Tetrachloromethane)	56-23-5				
	Chlordane (technical mixture and metabolites)	57-74-9				
	Chlorobenzene	108-90-7				
	Chloroethane (aka Ethyl chloride)	75-00-3				
	2-Chloroethyl vinyl ether (mixed)	110-75-8				
	Chlorodibromomethane	124-48-1				
	Chloroform (aka Trichloromethane)	67-66-3				
	2-Chloronaphthalene	91-58-7				
	2-Chlorophenol	95-57-8				
	4-Chlorophenyl phenyl ether	7005-72-3				
	Chrysene	218-01-9				
	4,4-DDT	50-29-3				
	4,4-DDE (aka p,p-DDX)	72-55-9				
	4,4-DDD (aka p,p-TDF)	72-54-8				
	Dibenzo(a,h)anthracene (aka 1,2,5,6-Dibenzanthracene)	53-70-3				
	Di-n-butyl phthalate	84-74-2				
	1,2-Dichlorobenzene	95-50-1				
	1,3-Dichlorobenzene	541-73-1				
	1,4-Dichlorobenzene	106-46-7				
	3,3-Dichlorobenzidine	91-94-1				
	Dichlorobromomethane	75-27-4				
	1,1-Dichloroethane	75-34-3				
	1,2-Dichloroethane (aka Ethylene dichloride)	107-06-2				
	1,1-Dichloroethene (aka 1,1-Dichloroethylene)	75-35-4				
	trans-1,2-Dichloroethene (aka trans-1,2-Dichloroethylene)	156-60-5				

Methods of Disposal

Refer back to TRI disposal categories:

- Storage in containers, removed by licensed hauler
- Solidification/stabilization, removed by licensed hauler
- On-site wastewater treatment, removed by hauler
 - Discharge to surface impoundment
 - Land treatment
 - Other land disposal
 - Underground injection to disposal wells
 - Incineration/thermal treatment
 - Use as fuel
 - Energy recovery
 - Recycled directly back into process
 - Recovered, recycled back into process
 - Regeneration (e.g., acids)
 - Transfer to broker
 - Other

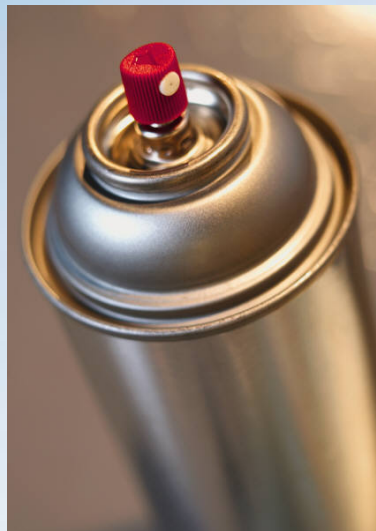
Release Plan(s) In Place?

- SPCC
- PIPP
- Slug Control Plan
 - EMS
- General Spill Plan
 - BMPs

OR:

On-Going Verification of No Exposure

- Responsible person(s)
- How (MSDS review, analytical, EMS/ISO Team review)
- Include off-the-shelf commodity materials!



Estimate of Potential Release Volume

Important, used to determine if Slug Control Plan is needed (required every 2 years for SIUs)

Rely on Tier Two data (maximum on-site at any one time); and

Historic/potential for release

Typical Slug Control Plan Review

	Yes	NO	
1. Is a description of discharge practices, including non-routine batch discharges, included?			
2. Is there a description of stored chemicals?			
3. Are procedures for immediately notifying the POTW of slug discharges, including any discharges that would violate a prohibition under 40 CFR 403.5(b), with procedures for follow-up written notification within 5 days, included?			
4. Are procedures to prevent adverse impact from accidental spills including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off and a description worker training programs included?			
5. Are necessary measures for building containment structures or equipment included?			
6. Is there a description of necessary measures for containing toxic organic pollutants (including solvents)?			
7. Is there a description of necessary measures and equipment for emergency response?			
8. Are necessary follow-up practices to limit the damage suffered by the treatment plant or the environment included?			

Slug Control Plan Elements

- Facility identification and location
- Responsible employee(s)
- Contacts (on-hours and off-hours)
- Flow characteristics (average volume, maximum volume, discharge point, non-routine batch discharges)
- Identification of toxic organic chemicals applicable to slug control
- Identification of an applicable release
- Programs in place (SPCC, PIPP, BMP, EMS, EMP, etc.)
- Identification of spill/response equipment on-site/off-site
- Slug loading prevention (process monitor, discharge monitor, operator attendance, containment structures, spill prevention, proper material use/handling, training, maintenance of structures and equipment, inspection of use/storage areas, loading/unloading procedures)
- Notification and follow-up procedures (who, what information, when)
- Site drawing (locations of stored/in-use toxic organic chemicals, locations of waste, locations of containment structures, locations of discharge points, locations of floor drains, locations of storm water drains)

Implementation

- Does plan adequately reflect the industry?
- Does plan appear to be “implementable?”
 - Is plan implemented?