



# WASTEWATER DISCHARGE PERMIT: APPLICATION

Department of Public Works  
Industrial Pretreatment Program  
342 SW 4<sup>th</sup> Street / Troutdale, OR 97060

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<b>DATE SUBMITTED</b>	
<b>DATE APPROVED</b>	

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A City of Troutdale Wastewater Discharge Permit (WDP) is required if a facility intends to discharge industrial/commercial wastewater to the City of Troutdale's publicly owned treatment works (POTW) in accordance with 40 CFR Part 403 and Troutdale Municipal Code (TMC) Chapter 12.07.

To obtain a permit, the first step is to submit a complete WDP application. The WDP application asks for detailed information about the facility's processes, wastewater generation and disposal activities.

The following guidelines apply to the application:

- Answer all questions and include the required exhibits.
- If there are questions about the requested information, please contact the Environmental Specialist at:
  - [ryan.largura@troutdaleoregon.gov](mailto:ryan.largura@troutdaleoregon.gov)
  - 503-674-3311
- Enter "N/A" if a section does not apply.
- Use additional pages, if needed.
- Submit a .pdf copy of the completed application packet to the Environmental Specialist for review.
- Retain a copy of the final, signed original application copy for five (5) years.
- This application may satisfy the Baseline Monitoring Report (BMR) provisions of 40 CFR Part 403.12 of the General Pretreatment Regulations.

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## Section 1.0

# APPLICANT INFORMATION

**Table 1. Facility Information**

<b>Name</b>	
<b>Address</b>	
<b>City</b>	
<b>State</b>	
<b>Zip Code</b>	

**Table 2. Facility Postal Mailing Information**

☐ Check box if same as Facility Information.

<b>Name</b>	
<b>Address</b>	
<b>City</b>	
<b>State</b>	
<b>Zip Code</b>	

**Table 3. Parent Company or Owning Entity Information**

☐ Check box if same as Facility Information.

<b>Name</b>	
<b>Mailing Address</b>	
<b>City</b>	
<b>State</b>	
<b>Zip Code</b>	

Authorized Representative of a user means:

1. If the user is a corporation:
  - a. The president, secretary, treasurer, or a 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
  - b. The manager of one or more manufacturing, production, or operation facilities provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
2. If the user is a partnership or sole proprietorship: a general partner or proprietor, respectively.
3. If the user is a federal, state, or local governmental facility: a director or highest official appointed or designated to oversee the operation and performance of the activities of the government facility, or their designee.
4. The individuals described in subsections 1 through 3, above, may designate another authorized representative if the authorization is in writing by the individual described in subsections 1 through 3 above, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates or having overall responsibility for environmental matters for the company, and the written authorization is submitted to the city.

**Table 4. Facility Authorized Representative Information**

<b>Name</b>	
<b>Title</b>	
<b>Mailing Address</b>	
<b>City</b>	
<b>State</b>	
<b>Zip Code</b>	
<b>Email Address</b>	
<b>Office Phone No.</b>	
<b>Cell Phone No.</b>	

**Table 5. Facility Pretreatment Operator Information**

☐ Check box if same as Facility Authorized Representative Information.

<b>Name</b>	
<b>Title</b>	
<b>Mailing Address</b>	
<b>City</b>	
<b>State</b>	
<b>Zip Code</b>	
<b>Email Address</b>	
<b>Office Phone No.</b>	
<b>Cell Phone No.</b>	

**Table 6. Facility 24-Hour Emergency Contact**

☐ Check box if same as Facility Authorized Representative Information.

☐ Check box if same as Facility Pretreatment Contact Information.

<b>Name</b>	
<b>Title</b>	
<b>Mailing Address</b>	
<b>City</b>	
<b>State</b>	
<b>Zip Code</b>	
<b>Email Address</b>	
<b>Office Phone No.</b>	
<b>Cell Phone No.</b>	

## Section 2.0

# FACILITY OPERATION

### 2.1 Schedule of Operations

- SHIFT TIME – Enter the start and end time of each applicable shift.
- NO. OF EMPLOYEES – Enter the total number of employees for each shift.

**Table 7. Schedule of Operations**

	Operating Times			No. of Employees		
	1 <sup>st</sup> Shift	2 <sup>nd</sup> Shift	3 <sup>rd</sup> Shift	1 <sup>st</sup> Shift	2 <sup>nd</sup> Shift	3 <sup>rd</sup> Shift
Shift Time						
<b>Day</b>	Mark an "X" in each applicable cell below					
Monday						
Tuesday						
Wednesday						
Thursday						
Friday						
Saturday						
Sunday						

- Check the boxes that apply.
- Provide the answers requested.
- Enter "N/A" if the question does not apply.

**Table 8. Schedule of Operations Variability**

	Continuous Year-Round Facility Operations		Seasonal Facility Operations			
If seasonal, list the months operations occur:						
	Continuous Year-Round Facility Discharges		Seasonal Facility Discharges			
If seasonal, list the weeks and/or months discharges occur:						
Do operations shut down regularly for maintenance, vacation, or other reason?			Yes			No



If "Yes", list the reason and timeframe:	
--	--

## 2.2 Description of Facility Operations

- NAICS/SIC CODE – Enter the associated NAICS/SIC code for the facility.
- PROCESS DESCRIPTION – Provide a description of each manufacturing and/or service process that use water (attach additional sheets if necessary).
- RAW MATERIALS – List the non-chemical/product raw materials used in the process described. Chemical(s) and or product(s) used in the corresponding process will be listed in Table 13.

**Table 9. Facility Process(es)**

Process No.	NAICS/SIC Code	Process Description	Raw Materials
1			
2			
3			
4			
5			

## 2.3 Industrial Category

- Place a check beside the applicable industrial category if the facility employs or will employ processes in any of the industrial categories or business activities listed below regardless of whether they generate wastewater, waste sludge, or hazardous waste.
- If the industrial category is "Other", please describe the activity. For more information on each industrial category, refer to the associated Code of Federal Regulations, Title 40, code number.

**Table 10. List of Categorical Pretreatment Standards**

	<b>Industrial Category</b>	<b>40 CFR</b>
	Airport Deicing	449
	Aluminum Forming	467
	Asbestos Manufacturing	427
	Battery Manufacturing	461
	Canned and Preserved Fruits and Vegetable Processing	407
	Canned and Preserved Seafood (Seafood Processing)	408
	Carbon Black Manufacturing	458
	Cement Manufacturing	411
	Centralized Waste Treatment	437
	Coal Mining	434
	Coil Coating	465
	Concentrated Animal Feeding Operations (CAFO)	412
	Concentrated Aquatic Animal Production (Aquaculture)	451
	Construction and Development	450
	Copper Forming	468
	Dairy Products Processing	405
	Dental Office	441
	Electrical and Electronic Components	469
	Electroplating	413
	Explosives Manufacturing	457
	Ferroalloy Manufacturing	424
	Fertilizer Manufacturing	418
	Glass Manufacturing	426

	Grain Mills	406
	Gum and Wood Chemicals Manufacturing	454
	Hospitals	460
	Ink Formulating	447
	Inorganic Chemicals Manufacturing	415
	Iron and Steel Manufacturing	420
	Landfills	445
	Leather Tanning and Finishing	425
	Meat and Poultry Products	432
	Metal Finishing	433
	Metal Molding and Casting (Foundries)	464
	Metal Products and Machinery	438
	Mineral Mining and Processing	436
	Nonferrous Metals Forming and Metal Powders	471
	Nonferrous Metals Manufacturing	421
	Oil and Gas Extraction	435
	Ore Mining and Dressing (Hard Rock Mining)	440
	Organic Chemicals, Plastics and Synthetic Fibers (OCPSF)	414
	Paint Formulating	446
	Paving and Roofing Materials (Tars and Asphalt)	443
	Pesticide Chemicals	455
	Petroleum Refining	419
	Pharmaceutical Manufacturing	439
	Phosphate Manufacturing	422
	Photographic	459
	Plastics Molding and Forming	463
	Porcelain Enameling	466
	Pulp, Paper, and Paperboard	430
	Rubber Manufacturing	428

	Soap and Detergent Manufacturing	417
	Steam Electric Power Generating	423
	Sugar Processing	409
	Textile Mills	410
	Timber Products Processing	429
	Transportation Equipment Cleaning	442
	Waste Combustors	444
	Other (Describe):	

## 2.4 Operation Changes and/or Expansion

☐

Check box if operation changes and/or expansion are not planned within the next five (5) years.

- Describe any planned or anticipated process changes and/or expansion that would affect water usage and/or wastewater generation at the facility within the next five (5) years.

**Table 11. Operation Changes and/or Expansion**

Estimated Year	Description of Planned or Anticipated Process Changes and/or Expansion

## 2.5 Environmental Permit(s)

- List all environmental permits issued to the facility including the WDP if the facility is currently permitted.

**Table 12. Environmental Permits**

Permit Name	Agency	Permit Number	Expiration Date

## Section 3.0

# WASTEWATER INFORMATION

### 3.1 Chemical Usage

☐

Check box if chemicals are not used or planned to be used in the corresponding process.

Identify chemicals used in the facility's processes that generate wastewater.

- **CHEMICAL/PRODUCT NAME** – Enter the chemical(s)/product(s) that correspond to the Process No. from Table 9.
- **QUANTITY USED** – Enter the average and maximum quantities used per specified timeframe (e.g., per day, per week, etc.) with a unit of measurement and indicate if the amount is estimated with "Est."
- **MAXIMUM AMOUNT STORED** – Enter the maximum quantity of each chemical/product stored onsite.

**Table 13. Chemical/Product Inventory**

Process No.	Chemical(s)/Product(s) Name	Quantity Used		Maximum Quantity Stored
		Avg.	Max.	
1				
2				
3				
4				
5				

### 3.2 Batch Discharges

☐

Check box if batch discharges are not discharged or planned to be in identified processes.

- **NO. OF BATCH DISCHARGES** – Enter the average and maximum number of batch discharges that occur in a specified time period (e.g., per day, per week, etc.).
- **VOLUME PER BATCH** – Enter the average and maximum volume per batch discharge with a unit of measurement and indicate if the amount is estimated with "Est."
- **PERCENT OF TOTAL DISCHARGES** – Enter the percent of batch discharge for each Process No. compared to the total amount of process wastewater generated at the facility.

**Table 14. Batch Discharges**

Process No.	No. of Batch Discharges		Volume Per Batch		Percent of Total Discharge
	Avg.	Max.	Avg.	Max.	
1					
2					
3					
4					
5					

### 3.3 Accidental Spill Prevention/Slug Discharge Information

- A slug discharge is any discharge of a non-routine episodic nature, including but not limited to an accidental spill or a non-customary batch discharge, which has a reasonable potential to cause interference or pass through, or in any other way violate the POTW's regulations, local limits or permit conditions [40 CFR 403.8(f)(2)(v)].

**Table 15. Accidental Spill Prevention/Slug Discharge Information**

Does the facility have an accidental spill prevention/ slug discharge control plan?		Yes		No
If "Yes", include the plan with application.				
If "No", describe what controls are in place to prevent an accidental spill and/or slug discharge?				
Are floor drains in the manufacturing, raw material and/or chemical storage area(s)?		Yes		No
If "Yes", describe where the floor drains drain to:				
Describe how an accidental spill or slug discharge could enter the POTW or storm sewer system besides a floor drain:				

### 3.4 Wastewater Pretreatment

- Check the box beside the device or process of pretreatment that identifies the type of pretreatment, if any, for each waste stream.
- For Biological Treatment, Other Chemical Treatment, Other Physical Treatment, and Other Treatment selections, please describe those pretreatment procedures used.

**Table 16. Pretreatment Devices or Processes**

	(A) Air Flotation		(H) Grease or Oil Separation		(O) Sump
	(B) Centrifuge		(I) Grease Removal Device		(P) Sedimentation
	(C) Chemical Precipitation		(J) Ion Exchange		(Q) Septic Tank
	(D) Chlorination		(K) Neutralization, pH correction		(R) Solvent Separation
	(E) Cyclone		(L) Ozonation		(S) Spill Protection
	(F) Filtration		(M) Reverse Osmosis		(T) Rainwater Diversion or Storage
	(G) Flow Equalization		(N) Screen		
					(U) Biological Treatment
					(V) Other Chemical Treatment
					(W) Other Physical Treatment
					(X) Other Treatment

### 3.5 Non-Discharged Wastes

☐

Check box if facility does not generate non-discharged wastes.

- **NON-DISCHARGED WASTE** – Describe the liquid waste/sludge generated by the facility and identify if it is hazardous waste according to Oregon administrative rules.
- **MEANS OF REMOVAL** – Indicate if the non-discharged waste is treated on-site or off-site and describe how it is disposed (e.g., incineration, landfill, disposal facility)
- **FREQUENCY** – Enter how often the non-discharged waste is removed for off-site or on-site treatment.
- **QUANTITY** – Enter the volume or mass with unit of measurement of non-discharged waste generated for a specific time period (e.g., tons/each removal; gallons/day).

**Table 17. Non-Discharged Waste**

Non-Discharged Waste	Means of Removal	Frequency	Quantity

- **NAME OF FIRM** – Enter the name of the company that removes or accepts non-discharged waste from the facility.
- **ON-SITE STORAGE** – Describe how the facility stores non-discharged wastes on-site (e.g., totes, aboveground storage tanks).

**Table 18. Firm Information for Non-Discharged Waste**

Name of Firm	Address of Firm	Onsite Storage



### 3.6 Best Management Practices

- Best management practices (BMPs) are management and operational procedures such as schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent discharges in violation of permit limits and/or general and specific prohibitions listed in 40 CFR 403.5(a)(1) and (b).
- BMPs may also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from chemical storage.

### Table 19. BMPs Implemented

Describe the types of BMPs employed to prevent pollutants from entering the facility's wastestream(s) and/or the POTW?

### 3.7 Outfall(s) Information

- **OUTFALL LOCATION** – Describe the outfall location immediately downstream of the Process No. and pretreatment.

### Table 20. Outfall Information

Process No.	Outfall	Outfall Location
1		
2		
3		
4		
5		

### 3.8 Outfall Monitoring

- Check the applicable boxes below for each designated outfall(s) if the monitoring equipment and/or sample type are currently being implemented or plan to be.

**Table 21. Outfall Monitoring**

Outfall	Monitoring Equipment			Sample Type		
	Flow	pH	Temperature	Composite Sampling		Grab
				Time-Based	Flow-Based	

## Section 4.0

# WATER BALANCE

### 4.1 Incoming Water: Supply

- E/M – Enter either “E” for estimated or “M” for metered
- GPD – Gallons Per Day

**Table 22. Incoming Water Supply**

Source	Ave. Flow (GPD)	Max. Flow (GPD)	E/M
City of Troutdale			
Other (e.g., Private well, reclaimed water, stormwater)			
Total			

### 4.2 Outgoing Water: Process Wastewater

- B/C – Enter either “B” for batch or “C” for continuous
- E/M – Enter either “E” for estimated or “M” for metered
- GPD – Gallons Per Day

**Table 23. Process Wastewater Discharge**

Process No.	Ave. Flow (GPD)	Max. Flow (GPD)	B/C	E/M
1				
2				
3				
4				
5				
Total				

### 4.3 Outgoing Water: Other Wastewater

- SANITARY(DOMESTIC) – If sanitary flow is not metered, estimate the average and maximum flow using an estimated 15 gallons per day for each employee based on staffing levels.
- B/C – Enter either “B” for batch or “C” for continuous
- E/M – Enter either “E” for estimated or “M” for metered
- GPD – Gallons Per Day

**Table 24. Other Wastewater Discharges, Deductions, or Losses**

Non-Process No.	Other Wastewater	Ave. Flow (GPD)	Max. Flow (GPD)	B/C	E/M
1	Sanitary (Domestic)				
2	Cooling Water (Non-Contact)				
3	Cooling Tower Bleed-Off (Non-Contact)				
4	Boiler Blowdown				
5	Incorporated in Production				
6	Irrigation				
7	Evaporation				
8	Hauled Wastewater				
9	Other:				
	Total Flow				

### 4.4 Water Balance

- Subtract Total Ave. of Outgoing Water from Total Ave. of Incoming Water to determine Balance
- Subtract Total Max. of Outgoing Water from Total Max. of Incoming Water to determine Balance

**Table 25. Water Balance Calculations**

Ave. Flow (GPD)		
Total Ave. of Incoming Water -	Total Ave. of Outgoing Water =	Balance
Max. Flow (GPD)		
Total Max. of Incoming Water -	Total Max. of Outgoing Water =	Balance

## Section 5.0

# CERTIFICATION

### 5.1 Authorized Representative Certification Statement

"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 violations".

Printed Name	
Title	
Primary Phone No.	
Email Address	
Date	
Signature	

**5.2 Wastewater Analyses Certification Statement**☐

Check box if the facility holds an active Wastewater Discharge Permit through the City of Troutdale. If box checked, analyses are not being conducted as part of this permit application.

"I certify that all analyses performed for this report were performed in accordance with procedures established by the City of Troutdale and contained in 40 CFR Part 136 and amendments thereto, or with any other test procedures approved by the City."

Printed Name	
Title	
Primary Phone No.	
Email Address	
Date	
Signature	

## Exhibit A

# FACILITY SITE LAYOUT

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Include a layout of the premises with the following information:

- Location of floor drains
- Storm sewer system
- Sanitary sewer system
- Numbered processes (from Table 9)
- Lettered pretreatment processes (from Table 16)
- Numbered outfall(s) (from Table 20)
- Sampling site location

Approved building plans may be submitted.

**Exhibit B****SCHEMATIC FLOW DIAGRAM**

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Include a schematic flow diagram of the numbered processes from Table 9 that includes the following:

- Callout of where raw materials, chemicals/products, and water enter the process
- Callout of location for pretreatment device(s) and/or process(es) from Table 16



## Exhibit C

# REPRESENTATIVE SAMPLING DATA

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☐

Check box if the facility holds an active Wastewater Discharge Permit through the City of Troutdale. If box checked, Exhibit C is not required.

Representative samples are required of normal work cycles on separate days and expected pollutant discharges to include:

1. Time, date, and place of sampling
2. Methods of analysis
3. Sampling must be:
  - Three (3) samples per each process discharge within a two-week period
  - Priority pollutants
  - Categorical pollutants not included in priority pollutant list, if applicable
  - Molybdenum, if not included in categorical pollutant list
  - BOD<sub>5</sub>, Oil and Grease, pH, Temperature, TSS
  - TTO monitoring for all categorical industries subject to a TTO standard except those facilities that plan to use alternate oil and grease limits provided in the Aluminum Forming, Copper Forming, and Coil Coating regulations

Samples should be taken immediately downstream of pretreatment facilities or immediately downstream from the regulated process if no pretreatment exists. If other wastewaters are mixed with the regulated wastewater prior to pretreatment, the facility should measure the flows and concentrations necessary to allow use of the combined wastestream formula to evaluate compliance with the Pretreatment Standards. Where an alternate concentration or mass limit has been calculated this adjusted limit along with supporting data shall be submitted to the City of Troutdale.

Sampling and analysis shall be performed in accordance with the techniques prescribed in [40 CFR part 136](#) and amendments thereto. Where [40 CFR part 136](#) does not contain sampling or analytical techniques for the pollutant in question, or where the City of Troutdale determines that the part 136 sampling and analytical techniques are inappropriate for the pollutant in question, sampling and analysis will be performed by using validated analytical methods or any other applicable sampling and analytical procedures, including procedures suggested by the POTW or other parties, approved by the City of Troutdale.

## Exhibit D

# HISTORICAL SAMPLING DATA

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☐

Check box if the facility holds an active Wastewater Discharge Permit through the City of Troutdale. If box checked, Exhibit D is not required.

Historical data may be submitted in lieu of representative sampling if the data provides information sufficient to determine the need for industrial pretreatment measures.

## Exhibit E

# ACCIDENTAL SPILL PREVENTION/SLUG DISCHARGE CONTROL PLAN

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☐

Check box if the facility does not currently have an Accidental Spill Prevention/Slug Discharge Control Plan.

Attach plan if one is available.

## Exhibit F

# TOTAL TOXIC ORGANICS

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☐

Check box if the facility is not one of the six (6) industrial categories listed below. If box checked, Exhibit F is not required.

The following six (6) industrial categories have a pretreatment standard for total toxic organics (TTO):

1. Electroplating
2. Metal Finishing
3. Electrical and Electronic Components (Phase I and II)
4. Copper Forming
5. Aluminum Forming
6. Coil Coating

The EPA defines TTO as the sum of the masses or concentrations of specific toxic organic compounds found in the industrial user's process discharge at a concentration greater than 0.01 mg/L. Facilities that use toxic organics listed by the EPA in its published categorical pretreatment standards are required to meet TTO pretreatment standards and must initially sample for TTO and determine compliance.

**Facilities in compliance** with TTO pretreatment standards can request to develop a solvent management plan as an alternative to periodically sample for toxic organics and include the following certification statement in each semi-annual compliance report submitted:

*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 the toxic organic pollutant management plan submitted to the Control Authority on (date to be specified).*

Guidelines for preparation of a Toxic Organic Management Plan (TOMP) (i.e., solvent management plan) include the following four steps:

1. Conduct a process engineering analysis to determine the source and type of toxic organic compounds found in the discharge, including sources and compounds that could

reasonable be expected to enter the wastewater in the event of spills, leaks, etc., based on the type of operations conducted.

- a. An examination of published reports on the specific industry;
  - b. A water flow diagram to identify all possible wastewater sources;
  - c. A list of raw materials used in the industrial processes, including chemical additives, water treatment chemicals and cleaning agents, and the wastewater stream that each regulated toxic organic could potentially enter;
  - d. Comparison of the toxics found in the effluent with the list of raw materials and selection of the most probable wastewater source;
  - e. Evaluation of the toxics found in the effluent, but not on the raw materials list and determination of those formed as reaction products or by-products;
  - f. Examination of sources such as equipment corrosion or raw materials' impurities that could result in release to wastewaters of toxic organic pollutants.
2. Conduct a pollutant control evaluation
3. Prepare a TOMP
  - a. 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 appropriate suppliers as necessary);
  - b. Descriptions of the methods of disposal other than dumping used for the inventoried compounds, such as reclamation, contract hauling, or incineration;
  - c. The procedures for ensuring that the regulated toxic organic pollutants do not spill or routinely leak into process wastewaters, floor drains, non-contact cooling water, groundwater, surface waters (i.e., Spill Prevention, Control, and Countermeasures (SPCC) Plan) or any other location which allows discharge of the compounds; and
  - d. Determinations or best estimates of the identities and approximate quantities of toxic organic pollutants used as well as discharged from the regulated manufacturing processes. Compounds present in wastestreams that are discharged to sanitary sewers may be a result of regulated processes or disposal, spills, leaks, rinse water carryover, air pollution control, and other sources.
4. Submit a TOMP and Certification Statement

**Facilities in non-compliance** with TTO pretreatment standards must prepare a compliance schedule of the shortest schedule for implementing additional operation and maintenance (O & M) and/or pretreatment necessary for meeting the applicable standards and requirements. The schedule will contain increments of progress for the start and finish of major events leading to construction and operation of the necessary O & M and/or pretreatment. No increment of progress shall exceed 9 months; the completion date shall not be later than the compliance date for the applicable pretreatment standards. Progress reports must be submitted no later than 14 calendar days following each date in the compliance schedule and the final compliance date.

A final compliance report must be filed within 90-calendar days of the final compliance date or within 90-calendar days of the compliance date specified by the City of Troutdale, whichever is earlier for the existing categorical industrial user. New source categorical industrial users must file a compliance report within 90 calendar days after the commencement of a discharge to the POTW.