



KC WATER

REGULATORY COMPLIANCE DIVISION

2 NE 32nd St • Kansas City, MO 64116

P: 816-513-0600 • www.KCWater.us

Toxic Organic Management Plan Guidance

How to prepare a TOMP for a KC Water wastewater discharge permit

1. Purpose

A Toxic Organic Management Plan (TOMP) identifies and controls potential toxic-organic discharges to the sewer. Every industry with a five-year KC Water permit must submit either a TOMP or a signed letter explaining why a TOMP is not applicable. Review and update the TOMP or letter with each permit renewal and when a substantial business change affects its basis.

When approved by KC Water, a TOMP may also allow certain regulated Industrial Users to certify that toxic organics are being properly managed in place of conducting routine Total Toxic Organic (TTO) monitoring, where allowed by applicable regulations.

A letter should explain the facility's toxic-organic use and applicable TTO requirements. Submitting a letter does not itself waive monitoring; any alternative to required monitoring must be approved by KC Water.

The TOMP must demonstrate that the facility has identified the toxic organic compounds used, stored, or reasonably expected to be present at the facility, and that appropriate procedures are in place to prevent those compounds from entering wastewater discharged to the Publicly Owned Treatment Works (POTW).

2. Required Contents of the TOMP

The Permittee shall develop and implement a TOMP that includes, at a minimum, the following information.

A. Toxic Organic Inventory

The TOMP must include an inventory of all toxic organics used, stored, generated, or otherwise present at the facility in any appreciable amount.

The inventory must include:

1. The quantity and general characteristics of each toxic organic compound;
2. The actual chemical name of each compound, using Safety Data Sheets or supplier information to identify constituents;
3. The applicable trade or product name as additional identification; trade names alone are not sufficient;
4. The manufacturer or supplier, if known;
5. The location where the compound is used or stored;
6. The process or activity associated with the compound;
7. Whether the compound is identified in wastewater sampling, safety data sheets, raw materials, process chemistry, or other facility records.



KC WATER

REGULATORY COMPLIANCE DIVISION

2 NE 32nd St • Kansas City, MO 64116

P: 816-513-0600 • www.KCWater.us

Where trade-name products are used, the facility should review safety data sheets and obtain additional information from the supplier or manufacturer as necessary to identify toxic organic constituents.

B. Process Description

The TOMP must describe the processes, operations, or activities that use or may generate toxic organic compounds. The description must include:

8. The specific process or operation using the toxic organics;
9. The purpose of the toxic organic in the process;
10. How the chemical is applied, transferred, stored, handled, or disposed of;
11. Whether the chemical has the potential to contact wastewater;
12. Whether rinse water, cleaning water, spent solutions, spills, leaks, or drag-out may carry the compound to a drain or sewer connection;
13. Any treatment, recycling, reclamation, or containment practices used to manage the compound.

C. Facility Schematic

The TOMP must include a clear schematic, site map, or process flow diagram showing where toxic organics are used, stored, handled, or may enter wastewater. The schematic must identify:

14. The processes using toxic organics;
15. Major points of application of toxic organics;
16. Toxic organic storage areas;
17. Chemical transfer areas;
18. Waste storage areas;
19. All floor drains in areas where toxic organics are used or stored;
20. All wastewater treatment units, if applicable;
21. All sampling locations;
22. All connections to the City sewer;
23. Any areas where spills, leaks, or washdown water could reach the sanitary sewer system.

The schematic must be legible, current, and detailed enough for KC Water to understand the relationship between chemical use, storage areas, floor drains, wastewater flow, and sewer connections.

D. Disposal and Management Methods

The TOMP must describe the disposal methods used for toxic organic compounds and toxic-organic-containing wastes. The plan must identify whether materials are managed through:

- Contract hauling
- Off-site disposal
- Hazardous waste disposal
- Recycling



KC WATER

REGULATORY COMPLIANCE DIVISION

2 NE 32nd St • Kansas City, MO 64116

P: 816-513-0600 • www.KCWater.us

- Reclamation
- Reuse
- Return to supplier
- Incineration
- Other approved disposal or management methods

Absolute prohibition

The TOMP must clearly state that concentrated toxic organics shall not be dumped, poured, rinsed, washed, or otherwise discharged to process wastewater, floor drains, sinks, storm drains, sanitary sewer connections, or any other location where the material may reach the City sewer system or the environment.

E. Procedures to Prevent Discharge to the Sewer

The TOMP must describe the steps taken to ensure toxic organics do not enter the sanitary sewer system. These procedures may include, but are not limited to:

- Diking or secondary containment
- Sealing or protecting floor drains
- Covering or isolating sewer access points
- Using spill pallets, containment trays, or berms
- Maintaining proper chemical storage practices
- Labeling chemical containers and storage areas
- Posting signs in areas where toxic organics are used or stored
- Conducting regular inspections by supervisors or responsible personnel
- Training employees on chemical handling, spill prevention, and sewer discharge restrictions
- Discussing TOMP requirements during safety meetings or operational meetings
- Maintaining spill kits in appropriate locations
- Establishing spill response and notification procedures
- Documenting spills, leaks, inspections, and corrective actions
- Reviewing procedures after process changes, chemical changes, construction activities, or discharge changes

The TOMP should clearly explain how the facility prevents toxic organics from entering process wastewater, floor drains, non-contact cooling water, stormwater, groundwater, surface water, or any connection to the City sewer.



KC WATER

REGULATORY COMPLIANCE DIVISION

2 NE 32nd St • Kansas City, MO 64116

P: 816-513-0600 • www.KCWater.us

3. TOMP Certification Statement

The TOMP must include a certification statement signed by the Authorized Representative of the Permittee. Once the TOMP has been submitted to and approved by KC Water's Regulatory Compliance Division, the Permittee may submit the TOMP Certification Statement with each Self-Monitoring Report (SMR) in place of routine TTO sampling, where allowed by the facility's wastewater discharge permit and applicable categorical pretreatment standards.

TOMP Certification Statement — required wording

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 wastewater 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 Water Services Department on _____.

Include the signed TOMP Certification Statement with each SMR for which KC Water has approved certification instead of TTO monitoring. An incomplete or unsigned statement does not satisfy that reporting option. The plan and monitoring alternative must be approved; submitting a plan alone does not replace required monitoring.

Compliance schedule sampling events, including Local Limits sampling required on a recurring schedule such as every five years, are not waived or replaced by an approved TOMP or TOMP Certification Statement. The TOMP Certification Statement may only be used in lieu of routine TTO sampling when approved by KC Water and allowed by the applicable permit conditions; it does not excuse the Permittee from completing any separate sampling, reporting, or compliance schedule requirements.

4. Validity and Required Updates

The approved TOMP applies to the current permit cycle and must remain accurate throughout that cycle. Review, update, and resubmit the TOMP or applicability letter with each permit renewal and sooner when a substantial change affects its basis.

The Permittee must update and resubmit the TOMP during the permit period if any of the following occur:

- Changes in chemical usage
- Changes in chemical storage
- Changes to facility processes
- Changes to wastewater treatment systems
- Changes to floor drains, sewer connections, or sampling locations
- Changes to chemical disposal or waste management practices
- Construction activities that may impact wastewater discharges
- Any other change that may affect the potential for toxic organics to enter the sanitary sewer system



For each renewal, provide the reviewed and updated TOMP or signed applicability letter, or identify the separate submittal made for that renewal. Use the Notice of Change Form at least 60 days before planned significant changes; report unplanned changes as soon as the facility becomes aware.

Maintain the current TOMP or applicability letter on site and make it available to responsible employees and City inspectors. Retain monitoring results, laboratory reports, sampling records, and required BMP documentation for at least three years. Keep records longer during unresolved litigation or when directed by the applicable authority, and make them available for inspection.

5. Reporting Certification Statement

The Permittee shall include the Reporting Certification Statement in all reports submitted to the Department or Director, including reports associated with the TOMP, self-monitoring reports, compliance schedule reports, and other required submittals.

The Reporting Certification Statement shall state:

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.

6. Submittal Instructions

Submittal channels

Submit through the KC Water reporting platform when available for your facility. Otherwise, mail the signed original and attachments to:

KC Water Regulatory Compliance Division
2 NE 32nd St
Kansas City, MO 64116

Email courtesy copies to water.ipp@kcmo.org to expedite review; email does not replace the signed submittal. Use the same signed-submittal instructions for plan updates and revisions.

Questions regarding TOMP requirements should be directed to KC Water's Regulatory Compliance Division at water.ipp@kcmo.org or by phone at (816) 513-0600.



KC WATER

REGULATORY COMPLIANCE DIVISION

2 NE 32nd St • Kansas City, MO 64116

P: 816-513-0600 • www.KCWater.us

Appendix A. Examples of Toxic Organic Compounds

This list is provided for guidance only and is not a substitute for the applicable federal categorical standard, wastewater discharge permit, or written direction from KC Water's Regulatory Compliance Division. The facility is responsible for reviewing its chemical inventory, safety data sheets, process chemistry, raw materials, waste streams, and applicable categorical standard to determine which toxic organic compounds must be addressed in the TOMP.

Common Solvents and Degreasers

- Methylene chloride (dichloromethane)
- Trichloroethylene (TCE)
- Tetrachloroethylene (perchloroethylene, PCE)
- 1,1,1-Trichloroethane
- 1,1,2-Trichloroethane
- Carbon tetrachloride
- Chloroform
- Chlorobenzene
- Benzene
- Toluene
- Ethylbenzene
- Xylenes

Volatile Organic Compounds

- Acrolein
- Acrylonitrile
- Vinyl chloride
- Methyl chloride
- Methyl bromide
- Bromoform
- Bromodichloromethane
- Dibromochloromethane
- 1,2-Dichloroethane
- 1,1-Dichloroethane
- 1,1-Dichloroethylene
- Trans-1,2-dichloroethylene

Phenols and Chlorinated Phenols

- Phenol
- 2-Chlorophenol
- 2,4-Dichlorophenol
- 2,4,6-Trichlorophenol
- Pentachlorophenol
- 2-Nitrophenol
- 4-Nitrophenol
- 2,4-Dinitrophenol
- 4,6-Dinitro-o-cresol

Phthalates and Plasticizers

- Bis(2-ethylhexyl) phthalate

- Butyl benzyl phthalate
- Di-n-butyl phthalate
- Diethyl phthalate
- Dimethyl phthalate
- Di-n-octyl phthalate

Polycyclic Aromatic Hydrocarbons (PAHs)

- Naphthalene
- Acenaphthene
- Acenaphthylene
- Anthracene
- Fluorene
- Fluoranthene
- Phenanthrene
- Pyrene
- Chrysene
- Benzo(a)anthracene
- Benzo(a)pyrene
- Benzo(b)fluoranthene
- Benzo(k)fluoranthene
- Indeno(1,2,3-cd)pyrene

Pesticides, PCBs, and Related Compounds

- Chlordane
- DDT, DDE, DDD
- Endosulfan, Endrin
- Heptachlor, Heptachlor epoxide
- Alpha-, Beta-, Gamma- (Lindane), Delta-BHC
- PCB-1016, 1221, 1232, 1242, 1248, 1254, 1260

Other Regulated Toxic Organics

- Isophorone
- Nitrobenzene
- Hexachlorobenzene, Hexachloroethane, Hexachlorobutadiene, Hexachlorocyclopentadiene
- N-nitrosodimethylamine, N-nitrosodiphenylamine, N-nitrosodi-n-propylamine
- 4-Chlorophenyl phenyl ether, 4-Bromophenyl phenyl ether
- Bis(2-chloroethyl) ether, Bis(2-chloroethoxy)methane, Bis(2-chloroisopropyl) ether



KC WATER

REGULATORY COMPLIANCE DIVISION

2 NE 32nd St • Kansas City, MO 64116
P: 816-513-0600 • www.KCWater.us
