



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.IN.gov

Mike Braun
Governor

Clint Woods
Commissioner

Total Toxic Organics (TTO) Reporting Guidance for IUs subject to 40 CFR 413 and 40 CFR 433:

The following is guidance for IUs required to monitor for TTOs semi-annually. It describes the procedure for determination of what to report on the MMR and DMR based on the information on the lab report.

Laboratories should be doing their best faith effort to achieve detection limits at or below 10 µg/L (0.01 mg/L) for all parameters. However, if after performing clean-up techniques and reanalyzing, and the laboratory still has values of non-detect above 10 µg/L, then the facility should report as less than (<) the limit of detection for the parameter on the list with the highest detection limit.

For example, the lab report is as follows:

Bis(2-ethylhexyl) phthalate <50 µg/L (<0.05 mg/L)

Bromoform <30 µg/L (<0.03 mg/L)

Chloromethane <100 µg/L (<0.1 mg/L)

All are below detection limit, therefore the reported value should be <0.1 mg/L. **Please keep in mind that the lab report will likely have values reported in µg/L (ppb), not mg/L (ppm). You will have to do the conversion since the permit limit is stated in mg/L.**

If the lab report has values that are detectable, the permit holder must report a summation of all quantifiable values greater than 0.01 mg/L from their lab results.

For example the lab report is as follows:

Bis(2-ethylhexyl) phthalate 530 µg/L (0.53 mg/L)

Bromoform <50 µg/L (<0.05 mg/L)

Benzyl chloride 15 µg/L (0.015 mg/L)

Fluoranthene 9 µg/L (0.009 mg/L)

The reported value would be 0.545 mg/L (0.015 + 0.53). The <0.05 does not count even though it is above 0.01, because it has a less than symbol and is therefore not quantifiable. The 0.009 does not get counted even though it is quantifiable, because it is not greater than 0.01 mg/L.

Do **not** report 0 (zero), BDL (below detection limit), ND (no detect) or < discharge limit (for example <2.13 mg/L).

If the permit holder has an approved toxic organic management plan (TOMP) on file with IDEM, they may sign a certification statement and submit it rather than analyzing for TTOs twice per year (June and December).

