



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

September 17, 2015

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 TTO 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.

If all values are Non-Detect, 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 <400 µg/L (<0.4 mg/L)

Bromoform <50 µg/L (<0.05 mg/L)

Chloromethane <100 µg/L (<0.1 mg/L)

All are below detection limit, therefore the reported value should be <0.4 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)

Chloromethane 100 µg/L (0.1 mg/L)

Benzyl chloride <1 µg/L (<0.001 mg/L)

Fluoranthene 9 µg/L (0.009 mg/L)

The reported value would be 0.63 mg/L (0.1 + 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 <0.001 also does not get counted toward the summation, since it is also not quantifiable. The 0.009 does not get counted even though it is quantifiable, because it is not greater than 0.01 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.**

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).



A State that Works