Health Care Sector Control Policy

Persigo Wastewater Treatment Plant
Industrial Pretreatment Division
2145 River Road
Grand Junction, CO 81505
970-256-4180
I. INTRODUCTION

The United States Environmental Protection Agency (EPA) requires the City of Grand Junction (City) / Mesa County Persigo Wastewater Treatment Facility (Persigo) to have an Industrial Pretreatment Program (Pretreatment) to prevent certain pollutants from entering the wastewater system. The pollutants of concern are those that can interfere with the operation of the wastewater treatment process, pass through the wastewater treatment system without adequate treatment or contaminate treatment plant biosolids.

The Health Care Facility Best Management Practices Policy (BMP or Policy) establishes City requirements for any Health Care Facility (HCF or facility) that has the potential to discharge wastes and associated pollutants related to the health care sector into the sanitary sewer system. Such wastes can contribute to wastewater treatment plant process interference, pass-through of pollutants into the environment, contaminate biosolids and impact sewer worker health and safety.

The purpose of this Policy is to minimize the loading of wastes and associated pollutants related to the health care sector from entering the sewer system at the source. The Policy encompasses the entire service area of the Persigo 201 sewer boundary, which includes the City of Grand Junction and portions of Mesa County.

Definitions of the terms used in this Policy are found in Grand Junction Municipal Code (GJMC) Sections 13.04.010 and 13.04.360.

II. AUTHORITY


GJMC Section 13.04.370 specifically prohibits the discharge of the materials that may cause harm to the Publicly Owned Treatment Works (POTW), which includes the sewer collection system and the Persigo facility. Some of these materials may be found in the discharge from a HCF.

All facilities to which this Policy applies shall comply with all the requirements in this Policy. Facilities shall permit inspections by the City with or without notice for the purpose of determining applicability and/or compliance with this Policy and requirements. Applicable facilities shall inform the City prior to sale or transfer of ownership of the business; or change in the trade name under which the business if operated; or change in the nature of the services provided that affect the potential to discharge pollutants; or remodeling of the facilities that may result in an increase in the pollutant loading.

The City's Industrial Pretreatment Division staff is responsible for implementing this Policy. Duties include but are not limited to reviewing building plans, inspecting applicable facilities for compliance and enforcing Policy requirements.

III. BACKGROUND

The purpose of this policy is to minimize the loading of excess wastes and associated pollutants related to the health care sector) entering the sewer collection system and the wastewater treatment plant from the HCF source.

In 2009 the City began requiring HCF to implement BMPs in order to minimize wastes and associated pollutants discharged from the health care sector.

IV. APPLICABILITY

All HCFs are required to complete a Health Care Facility Application to determine applicability of BMP requirements. Any facility that has the potential to discharge wastes and associated pollutants related to the health care sector into the
wastewater system is required to use the BMPs described in this Policy. This requirement applies to any non-domestic (i.e. commercial or industrial) facility and includes, but is not limited to, hospitals, medical office buildings, outpatient facilities, specialized surgical procedure facilities, long-term care facilities, hospice facilities, dialysis clinics, funeral homes and veterinary facilities.

This includes:

- New facilities, including the new ownership or lessee of existing facilities;
- Existing facilities closed for a period of one year or longer;
- Existing facilities undergoing remodeling with a change to plumbing and drainage fixtures; and
- Existing facilities changing from a conditionally exempt facility to one where wastes and associated pollutants related to the health care sector are used or discharged in amounts that could hinder sewage disposal.

This Policy does not apply to domestic residential users; however, the BMPs in Section V.C. of this Policy are recommended for domestic use to assist in keeping the sewer collection system and private sewer lines flowing freely.

V. CITY REQUIREMENTS

A. Plan Review. All HCFs are required to complete a City Health Care Facility Application to determine applicability of BMP requirements. If BMPs are required they shall be installed at the expense of the facility owner or lessee prior to opening for business.

1. The facility property owner or lessee or authorized representative is responsible for contacting the City for the purpose of obtaining a site plan review. The site plan review shall determine the need, size, location, and other BMP requirements necessary to control facility discharges into the sanitary sewer system. The review of such plans shall in no way relieve the facility from the responsibility of modifying such facilities as necessary to produce a discharge acceptable to the City in accordance with GJMC. The type of a required BMP shall be approved by the City prior to installation. Written approval from the City must be obtained prior to installation of a BMP.

2. Plans shall be submitted for approval prior to any of the following:

   - Construction of a new building;
   - Change in the building use or nature of the services provided that affects the potential to discharge wastes and associated pollutants related to the health care sector;
   - Remodeling of the facility that may result in an increase in flow or loading of wastes and associated pollutants related to the health care sector; and
   - Any other reason that otherwise requires the facility to submit plans or specifications for approval through the City or Mesa County Building Department (Building Department).

3. All plans submitted to the City must clearly show:

   - All building water and sewer plumbing;
   - A table or schedule identifying all plumbing fixtures; and
   - All chemical storage areas.

B. Variances. A variance from the requirements of this policy may be granted by the City for good cause. The facility has the burden of proof of demonstrating through data and other information why a variance should be granted. In no case shall a variance result in a violation of any City requirement or effluent limit specified in GJMC. The granting of any variance shall be at the sole discretion of the City. If a variance is granted for a specific Pretreatment requirement, the facility is still required to institute BMPs and other mitigation measures as determined by the City. If a variance is granted, and if the City determines there have been changes to the facility or to the facility’s operation that occurred after the time of granting the variance that would have required a specific Pretreatment
VI. BEST MANAGEMENT PRACTICES

A. The purpose of Best Management Practices (BMPs) is to minimize the discharge of wastes and associated pollutants into the sanitary sewer system. The following BMPs shall be implemented by applicable facilities:

1. Chemical identification. Facilities are required to maintain an inventory of all chemicals used.

2. Waste identification and characterization. Facilities are responsible for determining if their waste is regulated as medical waste, hazardous waste or radioactive waste per requirements of the Colorado Department of Public Health and Environment (CDPHE)\(^1\).

3. Chemical disposal. Excess chemicals, including laboratory reagents, expired or otherwise unwanted chemicals, shall not be disposed of to the sanitary sewer. The disposal of any hazardous or flammable chemical sterilants into any drain is prohibited.

4. Installation of mesh screens. Facilities with the potential to discharge debris greater than 1/2" in any dimension shall install a mesh screen or similar device to prevent such debris from entering the sanitary sewer system.

5. Body Wipes, Bandages, Diapers. Wastes such as body wipes, bandages, and diapers may not be discharged to the sanitary sewer system.

6. Sharps. Sharps shall not be disposed of in the sanitary sewer system. Sharps includes, but is not limited to: used needles; scalpel blades; syringes (with attached needle); pen needles; lancets; pasteur pipettes; broken blood vials; needles with attached tubing; suture needles; razor blades; tattoo pens and toothpicks; broken culture tubes and culture dishes (regardless of presence of infectious substances); broken and unbroken glassware that had contact with infectious substances (e.g., used slides and cover slips); disposable trocars; discarded unused or expired hypodermic needles, suture needles, syringes and scalpel blades.

7. Signage. Signs shall be posted above sinks and similar devices located in process areas prohibiting the discharge of any waste in violation of this Policy down the drains.

\(^1\) CDPHE Compliance Bulletin, Solid Waste, Medical Waste Identification, reviewed/revised February 2012

8. Employee training. Employee training shall be provided as part of the normal orientation process and annually thereafter and shall include, at a minimum, the following subjects:

- This Policy;
- How to properly dispose of all wastes;
- The location, use, and disposal of absorption products to clean spills;
- Proper clean-up techniques of cleaning product or other chemical spills; and
- How to sweep floors prior to floor wash down to ensure no excessive wastes and associated pollutants enter the sanitary sewer.

Training shall be documented and employee signatures retained indicating each employee’s attendance and understanding of the practices reviewed. Training records shall be retained for a period of three (3) years and made available for review at any time by the City.

B. Spill Prevention and Secondary Containment. All facilities are required to have measures in place and take proper precautions necessary to control unwanted discharges to the sanitary sewer. Chemicals, liquid products and wastes must be stored away from drains or within adequate containment to reduce the potential for spills reaching the sanitary sewer and/or storm drainage system. All chemical and waste storage areas must be properly maintained.
A Spill Response Plan shall be developed, updated and available at all times. Spill cleanup materials, such as absorbents, shall be readily available at all times. The washing of spills into drains is prohibited. Water shall not be used to clean up spills.

C. Prohibitions. A facility may not introduce into the POTW any pollutant(s) which cause(s) pass-through or interference. A list of general and specific prohibitions is contained in GJMC Chapter 13.04. Prohibited wastes that may be specific to the health care sector are:

1. Radioactive Wastes. Any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by the City Manager in compliance with applicable State or federal regulations.

2. pH. Pollutants which will cause corrosive structural damage to the POTW, but in no case discharges with pH lower than 5.0 S.U. or greater than 12.5 S.U.. Corrosive wastewater must be treated to adjust the pH to within these limits prior to discharge. Such treatment process must be approved in writing by the City and such treatment shall be recorded prior to discharge. Records shall include: the volume of the wastewater; the chemical name and volume of the chemical used for treatment; the pH readings prior to and after treatment; the dates and times of treatment and discharge; the technician’s signature who is responsible for the treatment and discharge; and any other information required by the City in its written approval. These records shall be maintained for a period of three (3) years and made available for review at any time by the City.

3. Bulk, unused, expired, outdated, concentrated or unwanted pharmaceuticals. Pharmaceuticals are any prescription or non-prescription over-the-counter chemical product, vaccine or allergenic that is intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease in humans or animals. Management of unused, expired, or unwanted pharmaceuticals including waste materials containing excess drugs (IV bags, tubing, vials etc.) shall be in accordance with applicable federal, State, and/or local regulations.

4. Biohazards. Waste containing or contaminated with organisms or viruses infectious to humans, animals, or plants including blood and body fluids, pathological waste, and infectious waste, shall be managed and disposed in accordance with federal and State regulations. The City’s Wastewater Division (970-256-4180) shall be immediately notified when the waste from any patient that has a disease caused by any of the biological agents and toxins listed in 42 CFR Part 73.3 (HHS select agents and toxins) has the potential to be discharged to the sanitary sewer system. Every attempt must be made to render any infectious substance non-threatening to the health of the public or to City employees working in the sanitary sewer system.

D. Hazardous Wastes. Hazardous waste as defined in 40 CFR Part 261 and/or as determined by CDPHE shall not be discharged to the sanitary sewer system unless specifically authorized by the City. A user may request approval from the City for the discharge of a hazardous waste. Such a request must be made in writing; no such discharge is allowed until written approval by the City is obtained.

E. Recordkeeping. Records, including waste manifests, training forms, logs, maintenance on wastewater treatment equipment, or any other records that document compliance with the requirements of this policy, shall remain on site and accessible for review by the City for a minimum of three (3) years. The City may require a user that falls under the provisions of this policy to submit copies of all records, receipts, manifests, or other documentation.

F. Discharge Request. A completed Request to Discharge Industrial Process Wastewater (Discharge Request) form shall be submitted for approval by the City for any non-domestic wastewater discharge that is non-routine or unique. Special discharges could include decontamination wastewater, rinsate from major clean-up activities, pool draining, etc. Any such discharge must include the Safety Data Sheet and/or lab analysis results for all parameters requested to be discharged. No discharge may occur without written City approval.
G. Other Potentially Applicable Sector Control Program Requirements. Facilities are often subject to additional City sector control programs. The appropriate City sector control program Policy shall apply if the facility can be classified under any of the following sector control programs. New sector control programs not listed here, nevertheless shall be adhered to by facilities if applicable.

1. Food Service Facility. A facility may be subject to the Fats, Oils and Grease (FOG) Best Management Practices Policy if preparation of food occurs onsite. This may include, but is not limited, to cafeterias, cafes, delicatessens and coffee shops. Such facilities shall install and maintain a gravity grease interceptor and adhere to BMPs as outlined in FOG Best Management Practices Policy.

2. Vehicle and Equipment Service Facility. A facility may be subject to the Petroleum, Oil, Grease and Sand (POGS) Best Management Practices Policy if the facility has the potential to discharge wastes containing sand, grit, and/or petroleum by-products into the wastewater system. Examples of such activities include, but are not limited, to automobile service, fleet maintenance, facility maintenance, mechanical repair, warehouses and parking garages. Such facilities shall install and maintain a sand/oil interceptor and adhere to BMPs as outlined in the POGS Best Management Practices Policy.

3. Photographic Processing Facility Best Management Practices (BMPs). A facility may be subject to these BMPs if photo processing, x-ray processing and printing/publishing occurs onsite. Such facilities are required to install and maintain, per manufacturer’s recommendations, an appropriate silver recovery unit or system and adhere to the BMPs as described.

VII. ENFORCEMENT

A. The City is required under federal regulation to enforce against violations pursuant to its Enforcement Response Plan. The City has the authority to seek and assess civil and/or criminal penalties for each violation for noncompliance by all industrial users of the publicly owned sewer system and has the authority to enforce the requirements in this Policy.

B. If an inspection of a facility shows non-compliance with any of the Policy requirements or any violation of the GJMC the facility will be issued a Notice of Violation to correct the violation. Inspection results will be provided in writing to the facility upon request.

C. Corrective deadlines for violations are as follows:

- Spills or leaks shall be cleaned-up within 24 hours;
- Records, receipts, and/or manifests of BMP maintenance not available for review upon inspection must be provided to the City within five (5) calendar days;
- Chemical storage/ secondary containment issues must be resolved within ten (10) calendar days;
- Missing mesh screens must be replaced within ten (10) calendar days;
- Missing signage must be replaced within ten (10) calendar days; and
- Violations involving improper employee BMP adherence shall require retraining of the employee with documentation of such training to be provided to the City within ten (10) calendar days.

D. If a facility fails to make the corrections within the allotted timeframe or as designated on the NOV, the facility will be subject to further enforcement including but not limited to increased fines and penalties and revocation of water and sewer service.

E. The City has the authority to perform work or hire a contractor to perform work necessary to bring a facility into compliance with this Policy. Any extraordinary costs incurred by the City due to Interference, damage, Pass through,
or maintenance necessary in the treatment and/or collection system shall be paid by the facility to the City. The direct costs of all labor, equipment and materials incurred in rectifying the Interference or damage, including reasonable attorney’s fees, shall be billed directly to the owner or the facility by the City, and such costs shall become part of the total charges due and owing to the City and shall constitute a lien on the facility until paid in full.

VIII. REFERENCES

A. Grand Junction Municipal Code Chapter 13.04
B. CDPHE Compliance Bulletin, Solid Waste, Medical Waste Generators, February 2012
C. CDPHE 6 CCR 1007-1 Part 04 Hazardous Materials and Waste Management Division, Rules and Regulations Pertaining to Radiation Control, Standards for Protection Against Radiation, effective 04/14/2013
D. 40 CFR Part 261
E. 42 CFR Part 73.3