

EBMUD Hospital Pollution Prevention Permit

Permit Issued – 06/26/2007

COMPLIANCE REQUIREMENTS

- I. All wastewater discharges shall be in compliance with EBMUD Wastewater Control Ordinance 311A-03.
- II. The Permit Holder shall not discharge the following to the sanitary sewer:
 - a. Hazardous waste, as defined in Section 25117 of the California Health and Safety Code, including those pharmaceuticals that are hazardous per state and/or federal law.
 - b. Sterilants including phenols and activated glutaraldehyde solutions.
 - c. Cleaning solutions and laboratory reagents containing heavy metals such as zinc and copper.
 - d. Mercury waste from laboratory processing, medical devices, pharmaceuticals or any other source.
 - e. Untreated radiographic process waste solutions and photographic chemicals containing heavy metals such as silver, chromium and selenium.
 - f. Radioactive wastewater except where the Permit Holder is authorized to use radioactive material by the Nuclear Regulatory Commission (NRC) or Department of Health Services (DHS) and when the wastewater is discharged in strict conformity with current NRC and DHS regulations and recommendations for safe disposal, and in compliance with all rules and regulations of state and local regulatory agencies.
- III. The Permit Holder shall identify, document and implement Best Management Practices (BMPs) to eliminate or minimize pollutants entering the sanitary sewer. The Permit Holder shall include in its BMPs:
 - a. Mercury reduction plan, including:
 - Mercury-reduction purchasing plan.
 - Perform facility audit to identify locations of mercury-containing equipment and reagents.
 - Replacement plan for mercury-containing equipment including but not limited to mercury thermometers, mercury-containing switches, and sphygmomanometers.
 - Mercury spill cleanup kits where mercury-containing equipment and reagents are located.
 - Where applicable, establish a p-trap and sump cleaning plan where mercury wastes are likely to accumulate.
 - Provide training on identification, handling, labeling, and spill cleanup of mercury-containing equipment or compounds.
 - b. Pharmaceutical disposal plan that reduces disposal of pharmaceuticals to the sanitary sewer, including:
 - Labeled containers at each nursing station and other applicable locations for disposal of pharmaceutical waste, in accordance with applicable federal or state regulations.
 - Staff training to reduce or eliminate disposal of liquid and solid pharmaceutical waste, including intravenous solutions containing pharmaceuticals, to the sanitary sewer. (Intravenous solutions containing only glucose, salt, lactate and/or electrolytes may be discharged to the sanitary sewer.)
 - c. X-ray/radiology pollution prevention plan, including:
 - Pre-treat or off-haul silver-rich wastewater generated from x-ray film processing.
 - No silver rich solution (e.g. fix, bleach-fix, washless stabilizer and low flow wash) shall bypass the treatment system prior to discharge to the sanitary sewer. Any overflow shall be pumped back into the treatment system for silver removal.
 - d. Laboratory pollution prevention plan, including:
 - Container security/secondary containment.
 - Drain protection (drain plugs, do not store chemicals near sinks).

- Collection of hazardous wastes and disposal off-site.
- e. Cooling tower pollution prevention plan, including:
- Elimination of tri-butyl tin, copper or chromium additives.
- IV. Documentation of BMPs shall be maintained at the facility and updated periodically to reflect any pollution prevention activities implemented to minimize wastes. The documentation shall be available for review upon request. Documentation that has been required by another agency may be acceptable.
- V. No hazardous pharmaceutical waste, as defined by state and federal law, shall be discharged to the sanitary sewer. EBMUD discourages disposal of all pharmaceuticals to the sanitary sewer. Any pharmaceutical disposed of via the sanitary sewer shall be documented and incorporated into an annual report.
- VI. The Permit Holder shall provide EBMUD access to hazardous waste manifest records upon request.

REPORTING REQUIREMENTS

- I. The Permit Holder shall submit current pollution prevention BMPs as required by Paragraphs III through V, Compliance Requirements. Documented BMPs are due 90 days after issuance of this Permit.
- II. Disposal of any pharmaceutical waste shall be documented, including substance, date and amount, and submitted in an annual report, due on the anniversary of this Permit.
- III. The Permit Holder shall report to EBMUD - Environmental Services Division any changes to the premises, processes, facilities or operations that significantly deviate from the terms and conditions of this Permit.
- IV. The Permit Holder shall notify EBMUD - Environmental Services Division at (510) 287-1651 during business hours, or (866) 403-2683 during non-business hours, immediately upon discovering any spill or slug discharge to the sanitary sewer. Formal written notification describing the circumstances and corrective action must be submitted to the District within five working days of the occurrence.

INSPECTIONS

EBMUD may conduct random, unannounced inspections or audits to verify compliance with the conditions of this Permit.

ENFORCEMENT AND PENALTIES

EBMUD will pursue enforcement and penalties as authorized by EBMUD Wastewater Control Ordinance, Title VI.

AUTHORIZATION

The above named Permit Holder is hereby authorized to discharge wastewater to the community sewer, subject to said Permit Holder's compliance with the EBMUD Wastewater Control Ordinance, Permit Terms and Conditions, and billing conditions. EBMUD may amend this Permit to include revisions during the term of the Permit.

DAVID R. WILLIAMS
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