

1.0 Purpose

To describe reporting of accidental and planned discharges to the sanitary sewer system. To prevent the exceedence of Metro Wastewater District's *Rules and Regulations* (Sections 6.17 [6.13, 6.14] and 6.18) governing discharges to the sanitary sewer.

2.0 Activity/Department

Building and property managers, O&M Contractor, and staff who work with and are responsible for boilers or chillers, janitorial services, and other activities that may result in a discharge to the sanitary sewer.

General Sources of Discharges Covered By This Procedure:

Fire and Domestic Water Lines: Periodically the Denver Federal Center (DFC) experiences a water line break. During the excavation of the line it is usually required to pump the chlorinated water escaping from the line.

Chillers, Boilers, Cooling Tower: The GSA uses evaporative coolers to cool its buildings in the summer months. Periodically these coolers require draining. The coolers use treated water along with a biocide. Boilers use treated water that occasionally requires draining to re-establish water balances.

Sanitary Sewer: If there is blockage in one of the DFC sewer lines it may be required that sewage be pumped from above the blockage to a discharge point below it to facilitate line repair and to keep the DFC open.

Incidental: Other sources that may be discharged that include all those discussed in reportable discharges and also include any hazardous or characteristic products/waste (40 CFR 261).

3.0 Forms Used

Sanitary Sewer Accidental/Planned Discharge

4.0 References

Metro Wastewater Reclamation District requirements

5.0 Acronyms, Abbreviations, and Definitions

Reportable Discharge: any material that is not normally discharged to the sanitary sewer or is a higher concentration than is normally used and greater than the manufacturers recommended concentration found on the product or accompanying instruction. This also includes any material that could potentially

cause a high biological oxygen demand, is toxic to bacterial growth, has a reactive or explosive capability, generation of toxic gas, or otherwise may be dangerous.

6.0 Exclusions

Operationally normal daily blow down of the system is excluded from the reporting requirements. These are not considered planned or accidental discharges. Any system upset which results in the daily blow down in excess of normal daily blow down, is reportable, and appropriate forms filled out (Section 7.2).

7.0 Procedure

7.1 Accidental Discharges to Sanitary Sewer

In the case of an accidental reportable discharge assure that all personnel are evacuated a safe distance away from the spill, if a hazard is present. Contact the Mega-Center at **(303) 236-2911** if it is an immediate emergency due to the nature of the spill. Then follow the following:

- Contact the GSA Environmental Programs Group (EPG) at 303-236-8000 (*listed names are as of Nov.15, 2006*):
 - Mr. Michael Gasser at 303-236-8000 x 5057 after hours at 303-985-9349
 - Ms. Shelly Club at 303-236-8000 x 2342
 - Mr. John Kleinschmidt at 303-236-8000 x 5030
- Complete the attached reporting form: Sanitary Sewer Accidental/Planned Discharge Form (Required Record). Include information on:
 - Current Condition of System – any current measured water quality parameters – pH, conductivity, etc.
 - Corrective Action – any steps taken to stop the spill.
- GSA EPG will immediately call Metro Waste Water at 303 286-3000 to report the discharge and report the above information to them.
- If the discharge is Hazardous Waste as per 40 CFR Part 261, GSA EPG will notify EPA and CDPHE.
- If Metro Waste Water requires a report, EPG will submit a report in 5 days that describes the:
 - Cause of discharge
 - Measure taken to prevent similar future occurrences

7.2 Planned Discharges

These typically include planned maintenance, bi-annual cooling tower discharges

and blow down from heating units to the sanitary sewer.

- Contact the GSA Environmental Programs Group (EPG) at 303-236-8000 (*listed names are as of Nov.15, 2006*):
 - Mr. Michael Gasser at 303-236-8000 x 5057
- Complete the attached reporting form: Sanitary Sewer Accidental/Planned Discharge Form (Required Record). Include information on:
 - Laboratory analysis required for Molybdenum (Moly) as per EPA Method 200.7 or 200.8. As of January 1, 2007 water with detectable Moly will not be discharged to any sanitary sewer. Moly analysis applies to chiller and cooling towers previously sampled. Closed loops with no historical sampling may require the following: As, Cd, Cr, Cu, Pb, Hg, Ni, Se, Ag, Zn. Check with EPG for guidance.
 - If the source of the water was previously sampled under the EPG program and the analysis found the system was moly free, then the responsible individual will fill out the *Certification for Industries using Water Treatment Chemicals in Cooling Heating System* form listing the chemicals used and attesting that they are moly free. The “Responsible individual” is one that can financially commit the representative company. The Financial liability for misidentification of moly free products will be borne by the contractor’s company. The company will hold the Government harmless for these actions.
- If discharge concentrations of regulated compounds exceed Metro Waste Water regulatory limits, then alternative disposal methods will be required. These may include; but not limited to:
 - Drain and disposal at a licensed treatment facility;
 - Filtration to remove or reduce the concentration of constituent above regulatory limits; or
 - Based on building water usage (either metered usage, or estimated 25 gpd/per person rate) during an average work week, calculate the discharge rate which would allow for meeting regulatory requirements at the discharge point where water leaves the building. The EPG will perform the calculations based on chemical concentrations determined by analysis.
- In order for Metro Waste Water to properly process the discharge request for disposal to the sanitary sewer, GSA must characterize the waste and make a determination that this is hazardous or non-hazardous waste. **This determination must be done by a government employee working in the EPG.** Waste designation by a contractor will result in the liability of misidentification being borne by the contractor’s company.
- GSA EPG will contact Metro Waste Water at 303 286-3000. Requests will be addressed to Mr. Eugene Jansak (ejansak@mwr.dst.co.us) who will address

the request. Metro Waste Water fax number is 303-286-3035.

- Provide all information as discussed above and on the attached forms.
 - Include documentation that the discharge does not contain a hazardous waste, as per CDPHE policy statement dated June 2005 regarding Hazardous Waste Authority for the Discharge of Hazardous Waste to Publicly Owned Treatment Works (POTW)
- Metro Waste Water will give written authorization for discharge on the day, prescribed time, and rate.

Discharge will not occur until authorization from Metro Waste Water has been received.

8.0 Records

- Sanitary Sewer Accidental/Planned Discharge Form Records
- Certification for Industries using Water Treatment Chemicals in Cooling Heating System
- Copies of information transmitted to Metro Waste Water
- Records of communications on accidental spills
- Certification for Industries using Water Treatment Chemicals in Cooling/Heating Systems



SANITARY SEWER DISCHARGE
DFC Environmental Management System

**Sanitary Sewer
 Accidental/Planned Discharge Form
 (Required Record)**

- Circle one **SPILL** or **PLANNED DISCHARGE**

Whether planned or accidental the basic information is needed:

- Location of Spill/Discharge: Building No. _____, location in reference to Building or door number: _____, Chiller No. _____.
- Date of Spill/Discharge ___/___/___ Time of discharge: _____ AM/PM
(important if the material needs to be isolated and recovered, or allows for an estimated time of arrival at the treatment plant so that the treatment plant can be prepared.)
- Volume of Spill/Discharge _____ gallons
- Flow rate of discharge _____ gallons per min or Discharge occurred over _____ Minutes

If any additives have been added or are present in the water provide a copy of the Material Safety Data Sheet (MSDS) for all chemical additives

- Last additive added to system: ___/___/___
- Type and Concentration of additive, volume of chemical last added to system: _____

Additional information (if available):

- Current Water Analysis including pH, conductivity, and concentration of additives in the water. Provide documentation.

Accidental Discharge [Spill] - IMMEDIATE RESPONSE

- Current Water Analysis if available
 - Laboratory analysis of concentration of additives if available
 - Copy of all MSDS for added chemicals or chemicals spilled
- GSA spill response: _____

Planned Discharge - Required to be submitted 5-days prior

- Current Water Analysis
 - Laboratory analysis of concentration of additives
 - Laboratory analysis (EPA Method 200.7 or 200.8) for Molybdenum – Required: may be expanded for closed loops not historically sampled to include As, Cd, Cr, Cu, Pb, Hg, Ni, Se, Ag, Zn. Check with EPG for guidance.
- Certification for Industries using Water Treatment Chemicals in Cooling Heating System along with base line laboratory analysis, see above.

Waste Designation Made by (GSA employee): _____ **Date:** _____

Hazardous Material _____ **Non-Hazardous Material** _____



**Sanitary Sewer
Accidental/Planned Discharge Form**

Record of Correspondence

EPG – Date of contact with Metro Waste Water: ___/___/___ Time: _____ AM/PM

West Metro Waste Water Contact: _____

Metro Directed Response: _____

Colorado Department of Public Health and Environment Contacted if required.

EPG – Date and time of contact: ___/___/___ Time: _____ AM/PM

Who did you talk with at CDPHE: _____

Conversation with CDPHE: _____
