



# SANITARY SEWER DISCHARGE

## Region 8 Sustainability & Environmental Management System

### 1.0 Purpose & Scope

In the event of a planned or accidental discharge to a sanitary sewer drain from either water from a broken pipe or a chemical spill, notify the local public or government agency that handles your waste water, **IMMEDIATELY** so that precautions can occur at the waste water treatment center. Failure to notify the proper authorities may result in legal actions (e.g., fines) against GSA.

### 2.0 Activities & Departments Affected

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.

### 3.0 Exclusions

Operationally normal daily blow down of the system is excluded from the reporting requirements; at the Denver Federal Center (DFC). These are not considered 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 6.3).

### 4.0 Forms Used & Permits Required: (include reporting requirements)

**Federal and State Forms and Permits:** Wastewater treatment facilities are managed by municipal governments and regulated by the Environmental Protection Agency

- For most of metropolitan Denver, Colorado, the Metro Wastewater Reclamation District is the wastewater treatment authority.
- For offices in Region 8 where GSA has the authority and/or responsibility to manage the building, the Building or Property Manager needs to determine the point-of-contact of the local sanitary, wastewater, or water & sewer district for where the GSA property resides, and appropriate reporting requirements.
- Examples of required reporting requirements are found in Attachment C. This example is from, the Metro Wastewater Reclamation District; it represents an example what many districts may require.

**In-house GSA Region 8 and Contractor Forms:**

- Sanitary Sewer Accidental/Planned Discharge

### 5.0 Acronyms, Abbreviations, and Definitions

Acronyms	Meaning
CEQ	Council of Environmental Quality
CFR	Code of Federal Regulations
CO	Contracting Officer
DFC	Denver Federal Center
COR	Contracting Officers Representative



# SANITARY SEWER DISCHARGE

## Region 8 Sustainability & Environmental Management System

Acronyms	Meaning
EPA	Environmental Protection Agency
EPG	Environmental Programs Group
GSA	General Service Administration
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
PBS	Public Building Services
POTW	Publicly Owned Treatment Works; formal term for a municipal wastewater treatment plant

### Definitions:

**Moly:** Molybdenum, molybdenum disulfide, or a chemical compound with molybdenum. The substance may be used as a lubricant, biocide, or as a corrosion inhibitor in boilers and cooling water systems to protect the system.

**Point Source Discharge:** Whenever there is wastewater discharging from a pipe or other "point" source into a waterway (river, lake, even intermittent stream), you will be subject to the Clean Water Act's National Pollution Discharge Elimination System (NPDES) permit program. Common NPDES wastewater sources include POTWs. (Source: FedCenter)

**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 Procedure

**State Specific Procedures & Requirements** [refer to individual State Legal Reviews for details on Statues, Laws, and Rules]:

- Wastewater treatment facilities are managed by municipal governments and regulated by the Environmental Protection Agency. Your local sanitary, wastewater, or water & sewer district for where the GSA property resides, can supply the appropriate reporting requirements and discharge limitations.

### Standardized Procedure:

**6.0** Comply with all federal and state regulations, and local ordinances. Where required obtain permits and comply with reporting requirements. Regulatory requirements generally come from the municipality (e.g., sanitary, wastewater, water & sewer districts).

### 6.1 General Sources of Discharges Covered by this Procedure

**Fire and Domestic Water Lines:** Periodically the buildings experience 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 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 facility 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).

## **6.2 Accidental Discharges to Sanitary Sewer**

In the case of an **immediate emergency** due to an accidental reportable **chemical** discharge (i.e., spill) assure that all personnel are evacuated a safe distance away from the spill, if a hazard is present.

- In Region 8 contact: **911**
- At the DFC first contact: **303-236-2911**
- At the DFC, then contact a GSA Environmental Programs Group (EPG) member:
  - Mr. Michael Gasser at 303-236-2791 after hours at 303-985-9349
  - Mr. John Kleinschmidt at 303-236-2858 after hours at 303-868-0795
- The following information is required to report a discharge to the sanitary sewer at the DFC, by Metro Wastewater District (source: Metro Wastewater District's *Rules and Regulations* (Sections 6.17 [6.13, 6.14] and 6.18)). Other districts may require the same or similar information. This Accidental/Planned Discharge Form is to be prepared by the EPG.
  - Location of spill: Building No.\_\_\_\_\_, Room No.\_\_\_\_\_
  - Chemicals which have been added to water or the chemicals spilled – Material Safety Data Sheet (MSDS) for the chemical that was spilled.
  - Concentration of added chemicals
  - Current Condition of System – any current measured water quality parameters – pH, conductivity, etc.
  - Volume – estimate of the discharge
  - Corrective Action – any steps taken to stop the spill.
  - Time Spill Occurred – important if the material needs to be isolated and recovered – or allows for estimate when it will be received at the treatment plant so they can prepare in case it causes a system upset.
- Immediately contact:
  - **At the DFC:** The EPG will immediately call Metro Waste Water at 303 286-3000 to report the discharge and report the above information to them.



## SANITARY SEWER DISCHARGE

### Region 8 Sustainability & Environmental Management System

- **Other Region 8 GSA locations:** Contact your local Municipal Sanitary Sewer utility.
- If discharge is Hazardous Waste per 40CFR PT261, the EPG will notify EPA and State Agency responsible for Environmental Protection (CDPHE for all of Colorado).
- Most Municipal Sanitary Sewer Utilities require a written report with 5 days of spill.
- All analytical data from spills will be entered into the GSA database by the EPG.
- If in Denver, Colorado, Metro Waste Water requires a report, EPG will typically submit a report in 5 days that describes the:
  - Cause of discharge
  - Measure taken to prevent similar future occurrences

#### 6.4 **Planned Discharges**

These typically include planned maintenance, bi-annual cooling tower discharges and blow down from heating units to the sanitary sewer.

- Contact EPG member:
  - Mr. Michael Gasser at 303-236-2791
- The Project Manager will gather the following information on an Accidental/Planned Discharge Form; and at the DFC give to the EPG for review and approval– hard copy- (See reporting sheet attached).
  - Location of proposed discharge – Building No.\_\_\_\_\_, Chiller No.\_\_\_\_\_, location in reference to Building or door number: \_\_\_\_\_
  - Date and Time of proposed discharge
  - Volume of planned discharge- gallons
  - Chemicals which have been added to water or chemicals spilled – Material Safety Data Sheet (MSDS) for the chemical(s), submitted each time
  - Last addition to system and volume added
  - Proposed flow rate of discharge – gallons per min
  - Concentration of material
  - Current Water Analysis including pH, conductivity, and concentration of additives in the water.
  - Laboratory analysis is required (EPA Method 200.7 or 200.8) for Molybdenum (Moly). After January 1, 2007, water with detectable Moly will not be allowed to be discharged to sanitary sewer. Moly analysis applies to chiller and towers previously sampled. Closed loops with no historical sampling may require the following analyses: Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Nickel (Ni), Selenium (Se), Silver (Ag), and Zinc (Zn) – Check with EPG for guidance.
  - DFC - If prior sampled under the EPG program and the analysis has indicate 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. Responsible individual is one that can financially commit the respected company. The Financial liability for misidentification of moly-free products will

be born by the contractor's company. The company will hold the Government harmless for these actions. In addition the request will provide all of the information in the above eight (8) sub-bullets.

- The Contractor, Property Manager, or EPG will create a contracting action to collect a sample, collect the sample, and conduct lab analysis.
- The Contractor or Property Manager will supply the EPG with a discharge form, MSDS, lab analysis results, and a "Certification for Industrials Using Water Treatment Chemicals in Cooling Systems" form if necessary.
- If discharge concentrations of regulated compounds exceed (Denver, Colorado - Metro Waste Water) regulatory limits set by the Municipal Sanitary Sewer Utility, than alternative approaches will be required. These include:
  - Drain and disposal at a licensed treatment facility
  - Filtration to remove or reduce the concentration of constituent above regulatory limits
  - Based on building water usage (either metered usage, or estimated 25 gpd/per person rate), during work week, calculate the discharge rate which would allow for meeting regulatory requirements at point of leaving the building. The EPG will perform the calculations based on chemical concentrations determined by analysis.
- Denver, Colorado Only - EPG will contact Metro Waste Water at 303 286-3000. Requests will be addressed to Mr. Eugene Jansak who will address the request. This will include all of the provided information. This will be faxed to Metro Waste Water at: 303-286-3035. Eugene's e-mail is: [ejansak@mwrddst.co.us](mailto:ejansak@mwrddst.co.us).
- Applies to Colorado Facilities. May be applicable in other states. Check you're your State Environmental Agency. Along with this fax or e-mail will be a determination that the discharge does not contain a hazardous waste. This is based on CDPHE policy statement in June 2005 regarding Hazardous Waste Authority for the Discharge of Hazardous Waste to Publicly Owned Treatment Works (POTW). 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 born by the contractor's company.
- Metro Waste Water will give written authorization for discharge on the day, prescribed time, and rate.

**Discharge will not occur until authorization from the Municipal Sanitary Sewer Utility (for Denver metro area -Metro Waste Water) has been received.**

## 7.0 Records Management

- Sanitary Sewer Accidental/Planned Discharge Form Records
- Certification for Industries using Water Treatment Chemicals in Cooling Heating System



# SANITARY SEWER DISCHARGE

## Region 8 Sustainability & Environmental Management System

- Copies of information transmitted to Municipal Sanitary Sewer Utility (Metro Waste Water for Denver Metro area)
- Records of communications on accidental spills
- Certification for Industries using Water Treatment Chemicals in Cooling/Heating Systems

### 8.0 References

- Denver metro area - Metro Wastewater Reclamation District requirements (*Rules and Regulations* Sections 6.17 [6.13, 6.14] and 6.18)

### 9.0 Appendices

Attachment A: *Point of Contacts*

Attachment B: *Sanitary Sewer Discharge Flowchart*

Attachment C: *Sanitary Sewer Accidental/Planned Discharge Form*

Attachment D: *Certification for Industries Using Water Treatment Chemicals In Cooling/Heating Systems*

Attachment E: *Sanitary Sewer Accidental/Planned Discharge Form Record of Correspondence*

Document Control Information:	Approved & Dated:
Sanitary Sewer Discharge "Month-Date-Year".doc	RJM July 6, 2012

Document Revision and Update:		
Revision Date	Nature of Revision	Revision made by:
12/15/2005	Working Draft	Mike Gasser, John Kleinschmidt
03/16/2006	Original Release	Mike Gasser
11/25/2006	Updated	Mike Gasser
11/13/2007	Updated	Mike Gasser
08/07/2009	Updated and SEMS document control	Mike Gasser
02/01/2010	Add ISO 14001 Document Controls, add state regulations, add Flowchart, and update to address new federal regulations.	Robert Melvin
04/02/2010	Changes for Regional Application	Mike Gasser
06/10/2010	Incorporate Region 8 requirements	Robert Melvin
10/07/2010	GSA telephone numbers changed	Robert Melvin
06/08/2012	Emphasize Roles and Responsibilities in section 6, update flowchart	Mike Gasser, Nick Gutschow, Robert Melvin



**Attachment A: Points of Contacts**

**REGION 8 (Other than the Denver Federal Center)**

For an emergency, such as a chemical spill contact your emergency responder at 911.

For technical assistance contact:

- Mr. John Kleinschmidt, DFC Environmental Manager, at 303-236-2858 after hours at 303-868-0795
- Mr. Michael Gasser at 303-236-2791 after hours at 303-985-9349

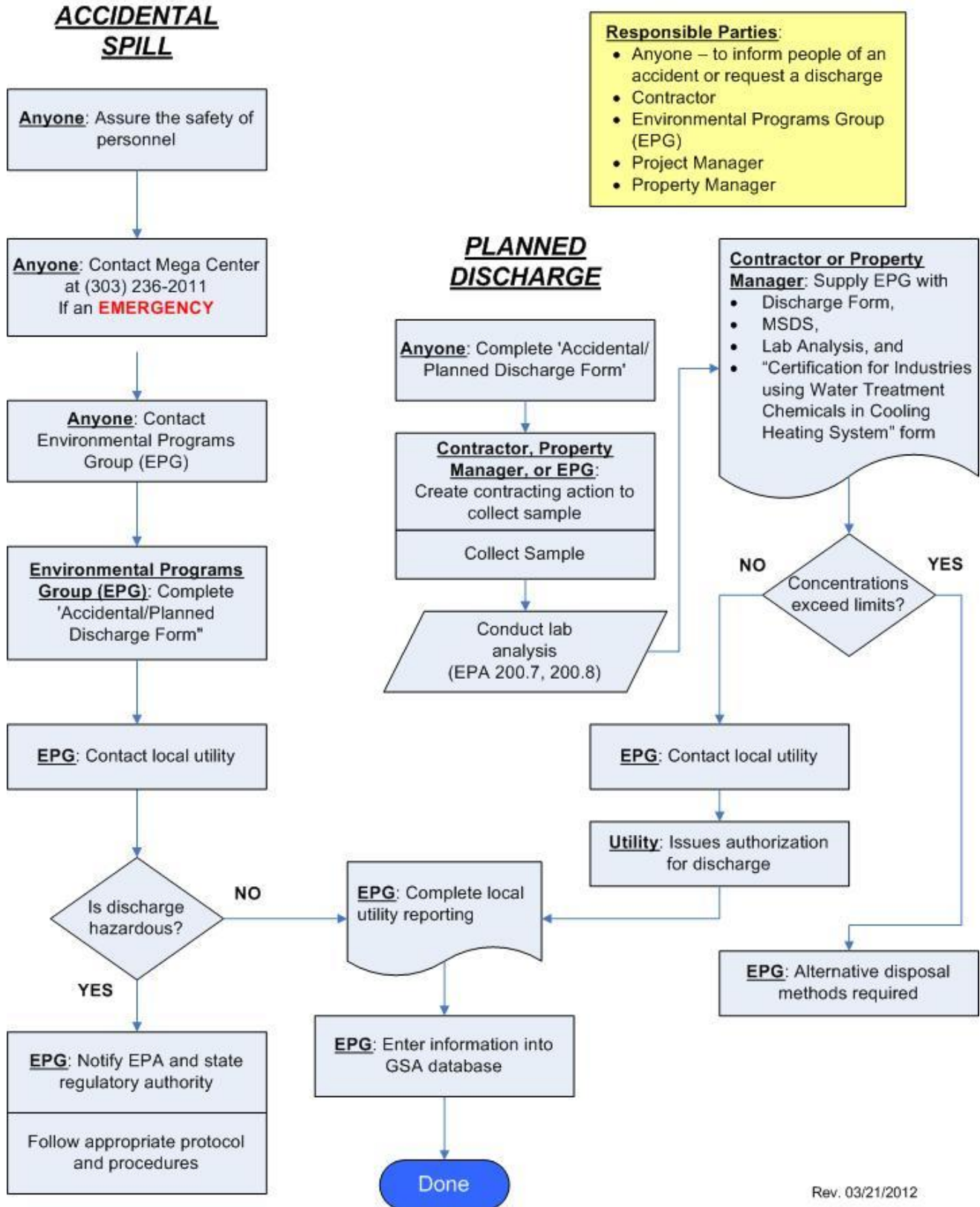
**DENVER FEDERAL CENTER**

Call 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 an Environmental Programs Group (EPG) member:
  - Mr. Michael Gasser at 303-236-2791 after hours at 303-985-9349
  - Mr. John Kleinschmidt at 303-236-2858 after hours at 303-868-0795

EPG will contact Metro Waste Water at 303 286-3000. Requests will be addressed to Mr. Eugene Jansak who will address the request. This will include all of the provided information. This will be faxed to Metro Waste Water at: 303-286-3035. Eugene's e-mail is: [ejansak@mwrddst.co.us](mailto:ejansak@mwrddst.co.us).

**Attachment B: Sanitary Sewer Discharge Flowchart**



Rev. 03/21/2012





**SANITARY SEWER DISCHARGE**

*Region 8 Sustainability & Environmental Management System*

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

- Circle one            DISCHARGE            or            SPILL
  - Location of Discharge/Spill – Building No \_\_\_\_\_, Chiller No. \_\_\_\_\_, location in reference to Building or door number: \_\_\_\_\_.
  - Date of Discharge/Spill \_\_\_/\_\_\_/\_\_\_ Time of proposed discharge: \_\_\_\_\_ AM/PM
  - Volume of Discharge/Spill, \_\_\_\_\_ gallons
  - Flow rate of discharge, \_\_\_\_\_ gallons per min or Discharge occurred over \_\_\_\_\_ Minutes
  - If any additives are present in the water provide a copy of the Material Safety Data Sheet (MSDS) for all chemical additives
  - Last addition to system: \_\_\_/\_\_\_/\_\_\_
  - Type and Concentration of additive, volume chemical last added to system: \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

**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.
- Certification for Industries using Water Treatment Chemicals in Cooling Heating System along with base line laboratory analysis, see above.

**Accidental Discharge [Spill]**

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

**Waste Designation Made by (GSA employee): \_\_\_\_\_ Date: \_\_\_\_\_**

**Hazardous Material \_\_\_\_\_ Non-Hazardous Material \_\_\_\_\_**





**SANITARY SEWER DISCHARGE**

*Region 8 Sustainability & Environmental Management System*

*Name (please type or print)*

*Position or Title*

**ATTACHMENT E:**

**Sanitary Sewer  
Accidental/Planned Discharge Form**

**Record of Correspondence**

**Date of contact with Sewer Treatment Plant (Metro Waste Water for Denver):** \_\_\_/\_\_\_/\_\_\_  
**Time:**\_\_\_\_\_ AM/PM

**Sewer Treatment Plant (Metro Waste Water for Denver)**

**Contact:**\_\_\_\_\_

**Directed Response:**\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**State Environmental Agency (Colorado Department of Public Health and Environment for Colorado) Contacted if required.**

**Date and time of contact:** \_\_\_/\_\_\_/\_\_\_      **Time:** \_\_\_\_\_ AM/PM

**Who did you talk with:**\_\_\_\_\_

**Conversation:**\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_