

## **JOINT BASE LEWIS MCCHORD PERMIT REQUIRED MANAGEMENT PRACTICES WASTEWATER PRETREATMENT**

This permit required management practice (PRMP) is being issued instead of an individual permit. PRMPs are mandatory under the Clean Water Act (CWA) and promote compliance with the NPDES permit requirements for stormwater and pretreatment programs. The intent is to provide efficient and effective procedures that protect personnel, plant operations, groundwater, surface water, marine waters and prevent wastewater treatment plant pass through. When these PRMPs are followed properly, they are an effective means of source control which prevents potential pass through or 'slugs' of untreated pollutants from entering the sanitary sewer system or illicit discharges to the stormwater system.

### **MEDICAL and VETERINARY FACILITIES**

Medical and veterinary facilities can generate wastes and wastewaters that should never be disposed of in drains or to the sewer; these include pharmaceuticals, drugs, laboratory, and disinfectant wastes. Unusable waste medicines, effluent from analytical equipment and processes in labs and other chemicals can present toxic effects to human health and the environment if they are flushed down the drain. Proper management and disposal of these medical wastes will prevent their release to the environment.

#### **Things to do to reduce Pharmacy Wastes and Disinfectant Wastes:**

1. Do not throw waste or unused pharmaceuticals into sinks, toilets, or other drains that connect to the sanitary sewer, except narcotics which are handled per procedures developed by the United States Environmental Protection Agency and the Washington State Department of Ecology.
2. Work with Public Works (PW) and/or Installation (approved Reverse Distributors and/or Returns Companies) to determine which products can be returned to the manufacturer and which may need to be managed as waste. Remember that pharmaceuticals include samples provided by suppliers.
3. Manage and identify all medical drug inventories by returning products to the manufacturers before their shelf-life expires. Inventory shelves and cabinets regularly to ensure pharmaceuticals are current and to comply with return schedules.
4. Designate a clearly marked outdated pharmaceutical quarantine area to accumulate outdated pharmaceuticals, pharmaceutical products that cannot be sold or pharmaceuticals that cannot be returned to the manufacturer. Collect aerosol products in a separate container.
5. For discharge of disinfectants to the sanitary sewer, follow manufacturers' procedures (e.g., Sidex OPA, formalin). When a new disinfectant is planned for use, contact PW Sustainable Acquisition Program (253-966-6466) to review.

### **Things to do to reduce Photo Processing Wastes (including X-Ray Developers, used X-Ray Fixer, and X-Ray Cleaners):**

Unusable photo-processing and X-Ray chemicals can present toxic effects to human health and the environment if they are flushed down the drain. Unused developer can contain hazardous chemicals and used X-Ray fixer contains silver. Wastewater treatment plants are not equipped to remove all photo-processing and X-Ray wastes. Proper management and disposal of these wastes will prevent release to the environment.

1. Switch to digital imagery and eliminate all photo processing wastes.
2. Do not throw used or unused photo-processing wastes into sinks, toilets, or other drains that connect to the sanitary sewer.
3. Unused developer can contain hazardous chemicals. Call PW Environmental Services (253) 966-3170 for proper characterization and disposal of both used and unused developers.
4. Used X-Ray Fixer contains silver and should be recycled so the silver may be reclaimed. Never mix X-Ray Fixers with developers.
5. Install and maintain a silver recovery system for the fixer wastewaters.
6. X-Ray cleaners can contain chromium and may need to be treated as hazardous waste. Call PW Environmental Services (253) 966-3170 for proper characterization and disposal.
7. Practice proper spill prevention and cleanup.

For additional pretreatment information, contact the Public Works Pretreatment Program at [usarmy.jblm.imcom-central.list.dpw-pretreatment@mail.mil](mailto:usarmy.jblm.imcom-central.list.dpw-pretreatment@mail.mil).

**NOTE:** All PRMPs are in the process of significant format and content update to meet multiple NPDES permit discharge requirements, JBLM 200-2 and JBLM 200-3.