

**Environmental Compliance and Pollution Prevention
Conference for Hospitals**

**Applicability of the Clean
Water Act to Hospitals and
Healthcare Facilities**

Philip Greco, CHMM, WSO-CHME
NPDES Program
U.S.E.P.A. Region 2

CLEAN WATER ACT (“CWA”)

- Federal Water Pollution Control Act
- Protect the Physical, Chemical and Biological Conditions of Nation’s Waters
- Established since 1972 and amended several times thereafter
- Role of EPA as the Federal Lead Agency

CWA - Definitions

- Pollutant - dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical waste, biological materials, radioactive materials, heat, wrecked or discarded materials, rock, sand, cellar dirt, and industrial, municipal and agricultural waste discharged into water.
- National Pollutant Discharge Elimination System (NPDES) - A point source program for issuing, modifying, revoking and reissuance, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements

CWA - Definitions

- Point Source - any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged.



NPDES Permits

- **Direct Discharges**
 - Regulated facility
 - Travels through a conveyance system
 - Discharge into waters of the U.S.
 - Role of State for implementation
 - New York (SPDES) – Delegated Program
 - New Jersey (NJPDES) – Delegated Program
 - Puerto Rico (NPDES) – Non-delegated Program
 - Virgin Islands (TPDES) – Delegated Program

Pretreatment Program

- **Indirect Discharges**
 - Regulated facility
 - Travels through a conveyance system
 - Discharges into Wastewater Treatment Plant
- **Control Authority**
 - Approved Program
 - Non-Approved Program
- **Role of State for implementation**
 - New York: Non-delegated Program
 - New Jersey: Delegated Program
 - Puerto Rico: Non-delegated Program
 - Virgin Islands: Non-delegated Program

Hospitals Source Category for Direct Discharges

- 40 CFR Part 460
- Hospitals with more than 1,000 occupied beds
- Best Practicable Technology Standards (BPT)
 - Daily Maximum
 - Daily Average over 30 consecutive days

Hospitals Source Category for Direct Discharges

- BPT

- BOD - daily maximum 90.4 lbs/1000 beds
- BOD - monthly average 74.0 lbs/1000 beds
- TSS - daily maximum 122.4 lbs/1000 beds
- TSS - monthly average 74.5 lbs/1000 beds
- pH - 6.0 to 9.0 SU

Hospitals Source Category for Indirect Discharges

- Pretreatment Program in New York State is administered by the EPA
- Permitting Program
- National and Local Pretreatment Standards
- Monitoring and Reporting
- Compliance and Enforcement

STORM WATER DISCHARGES

- Applicability – reference 40 C.F.R. Section 122.26
- Regulation Change – March 10, 2003, construction site applicability changes from 5 acres to 1 acre
- Point source/combined sewer
- U.S.E.P.A. Contact: Stephen Venezia
(212) 637-3856
- U.S.E.P.A. Website:
http://cfpub1.epa.gov/npdes/home.cfm?program_id=6

Contacts

- Philip Greco, U.S.E.P.A. Region 2
Enforcement Specialist
Tel. (212) 637-3313
Fax (212) 637-3953
e-mail: greco.philip@epa.gov
- Virginia Wong, U.S.E.P.A.
Pretreatment Coordinator
Tel. (212) 637-4241
Fax (212) 637-3953
e-mail: wong.virginia@epa.gov
- Underground Injection Control Program: if your facility discharges into an on site septic system, drywell, etc., UIC requirements may apply. See enclosed brochure for more information.