Central Contra Costa Sanitary District Source Control Requirements for Morgues and Mortuaries

(rev date: 4/11/06)

All discharges to the sanitary sewer system from mortuary and morgue facilities shall be in compliance with the Central Contra Costa Sanitary District's (District) Local Discharge Limits and with the discharge prohibitions referenced in Title 10 of the District Code.

- Embalming fluids typically contain aldehydes and/or phenols and have a pH of less than 5.0 units. Section 10.08.040.C of the District Code prohibits the discharge of any wastewater having a pH less than 5.5 units or equal to or greater than 12.5 units.
- Formaldehyde is defined by the EPA as a hazardous substance and is on the California list of hazardous wastes. Section 10.08.040.M of the District Code prohibits the discharge of hazardous wastes to the sanitary sewer system. It is the responsibility of the generator to determine if the working concentrations of embalming fluids used at the facility meet the hazardous waste criteria in Title 22 of the California Code of Regulations. Unless specific sampling and analysis are performed to document that embalming fluids used do not meet the criteria of a hazardous waste, then they are presumed to be a hazardous waste and shall not be discharged to the sanitary sewer.
- Operational procedures shall be employed during embalming operations to ensure that no concentrated solutions of embalming fluids are discharged to the sanitary sewer.
- The District's discharge limit for phenolic compounds is 10.0 mg/L.
- Concentrated disinfectant solutions containing phenolic compounds or other hazardous active ingredients shall be deactivated prior to discharging to the sanitary sewer, or they shall be properly disposed of at an off-site waste management facility.

Section 10.08.030.I of the District Code prohibits the discharge of wastewater containing substances or having characteristics which cause or threaten to cause a hazard to life or conditions sufficient to prevent normal entry into the sewers or other District facilities for maintenance and repair.

 There are possible health hazards to District personnel created by human blood discharged in substantial quantities to the sanitary sewer system. The discharger is required to develop procedures or facilities to ensure that whole blood wastes generated during embalming or autopsies of human bodies are disinfected prior to discharge to the sanitary sewer system.