

The CIPCA Monitor

June 29, 2011

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Hello CIPCA and welcome to the latest edition of the CIPCA Monitor! Has everyone been busy lately? A quick summary of the activities and training events offered to pretreatment professionals over the past several months would indicate that you have!

You may have participated in the educational R8PA Conference in Bryce Canyon Utah:



Attended a tour of DDi Corporation:



And even learned about Medical Marijuana at CIPCA's June ½ Day Workshop:



P.S.: More Inside!

The Colorado Industrial Pretreatment Coordinators Association (CIPCA) is an organization expressly for individuals who have a professional relationship within the Industrial Pretreatment profession.



Please send all questions, comments, and especially **submissions** to:

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View from the Chair & a re-cap of this quarter!

Bill Thomas
CIPCA Chair, City of Loveland

View from the Chair – June 2011

One down, one to go. Judging by the number of attendees (52) the June workshop was one of interest and a successful one. CIPCA extends a big thank you to Stephanie Gieck (EPA), Caleb Vannice (L/E WWTP), Joan Wickersheim (A.G. Wassenaar), and Fred Yoder (Boulder WWTP) for their presentations surrounding medical marijuana. I didn't realize how many options there were for growing a marijuana plant. Read more about the workshop inside this edition of the newsletter.

A sad situation developed and the Executive Committee wasn't sure the workshop would take place. Darrell Salazar (Natures Herb and Wellness) was going to talk about his business that collects and disposes of wastewater from facilities that grow medical marijuana. Unexpectedly, Darrell had a stroke and passed away the week prior to the workshop. Darrell was only 38 years old. He leaves behind his wife and three children (the youngest being two months old). I want to say THANK YOU to the workshop attendees for their contributions; \$100 went to his family.

The October 20th conference is taking shape and will have topics that should be of interest for all levels of pretreatment experience. Watch for future announcements.

Due to the recent website issue the Executive Committee will expedite the website project. I think it is important to have a local vendor provide the service especially one that can provide CIPCA the security needed to prevent issues in the future. We will do our best to ensure CIPCA has a safe and secure website available ASAP.

I'm going to plant a seed now; no, not marijuana! I do so because by the time the next newsletter goes out it may be too late. Come this October we'll be looking for members to fill terms due to expire on the Executive Committee. For those who may have concerns on filling a position I want you to know, from personal experience, that seven good members working together makes it easier to get things accomplished. Please consider volunteering for a position and carrying on the tradition of CIPCA.

Scott Caldwell
City of Boulder

Ahh . . . now that that little teaser is a page back, let's get down to business!

The array of speakers at R8PA's Workshop at Bryce Canyon, Utah covered everything from the basics in breakout rooms to the complicated issues on everyone's mind. It would be quite impossible to discuss every topic in detail but I would like to highlight a few things that stood out to me.

- The process of hydrofracking produced an estimated 780 million gallons of chemicals from 2005 – 2009 and utilizes approximately 750 different chemicals. The proper disposal methods of wastewater generated from this process will continue to be a problem for POTW's into the future.
- Pharmaceutical take back programs seem to be gaining some attention and traction in the western states. In some states prescription drug overdose kills more people than motor vehicle accidents. We need to control the destination of these waste products so they do not enter our waterways.
- Dental Amalgam Rulemaking Listening Session. This presentation garnered plenty of attention from the audience. To put things into perspective there are approximately 160,000 dentists practicing in over 120,000 offices. 120,000 potential new categorical industrial users are bound to pique curiosity!

CIPCA's tour of DDi was well attended and offered a rare perspective from a unique company in Colorado. DDi is capable of producing circuit boards that have more layers than most manufacturers in the state and even the country. Due to the International Traffic in Arms Regulations, or ITAR, I was not allowed to snap any pictures of the interior of their plant. (That's why these events are worth attending in person if possible!)

And last but not least was CIPCA's half day workshop this month. Devoted to medical marijuana issues the workshop provided insight into the world of grow operations and the types of chemicals that may be seen in their discharges. There are plenty of ways to grow robust plants and most methods use some form of chemical fertilizer. It is important to stay aware of these operations and educated on the issues. A very interesting topic indeed!

Dental Amalgam Separators - Quick Guide to Inspections

An Incomplete and Unofficial Guide to Amalgam Separator Inspections

Scott Caldwell – City of Boulder

With all of the talk over the past several months concerning dental amalgam separators, it seems only fitting to add some commentary on the issue.

When preparing to conduct inspections of amalgam separators it is important to be knowledgeable about the way they function.

There are many makes and models of separators but all should be ISO-11143 certified. An amalgam separator, simply put, is actually a coarse or heavy particulate separator. In the pictures to the right, I have used a clear system to illustrate the way they work. An air/liquid mixture enters the top of the separator. In the top chamber the air and liquid are separated and the solids and liquid collect in the lower chamber of the unit. Gravity pushes the liquid back up through the restricted pipe and reintroduces it to the airflow where it is pulled out of the separator leaving all heavy particulate matter in the “trap” or lower canister.

When you arrive at the dental office you will check for service records or waste shipment manifests. This will tell you if the office is maintaining the separator at a regular interval. You will then check on the installation. Someone in the office will know the location of the separator. You will need a flashlight in many cases to check the level of sludge that has been collected in the lower chamber of the separator and to verify that the separator is plumbed in-between the chairs and the vacuum pump. It will not collect amalgam waste if it is plumbed incorrectly and should be obvious.

Line cleaners should also be checked when you visit. A non-oxidizing, pH neutral cleaner should be used. Oxidizers will solubilize solid mercury and lead to pass through from the separator. Bleach should never be used to clean lines.

“Black Box” separators will prove difficult to inspect and may require contacting the manufacturer. In some cases you may need to return to the office and in others you may never see what is going on inside the unit and a different verification method may need to be implemented. This would be done on a case by case basis. In my personal experience, I much prefer the clear units.

Once proper installation of the separator is confirmed, maintenance records have been seen, sludge levels have been observed and line cleaners have been verified, you should be more confident in your area dentist!



A typical wall mount installation of a “clear” amalgam separator. Separators are almost always found near the vacuum system and always in-between the chairs and the vacuum pump.



Here you can see the sludge level below the Full line marked on the canister. A flashlight should be used to confirm the actual sludge level.

News from the EPA

Al Garcia

US EPA Region 8, Water Program Office of
Pollution Prevention / State & Tribal Assistance

Dental Amalgam Rulemaking

The Dental Amalgam Rule went to EPA Headquarters option selection, was selected to proceed further for rulemaking, and is scheduled to be proposed in the Federal Register this fall for public comment. During the Dental Amalgam workgroup discussions, I have been a strong advocate for ensuring this rule is not overly burdensome to the local Pretreatment programs that have to implement the regulations. In addition, EPA and the States will be required to provide control over the dental facilities affected by the Rule in cities with non-approved Pretreatment programs.

The dental facilities have had exposure for the elements of the rule affecting them such as the installation and maintenance of the amalgam separator along with good housekeeping practices within the office for many years, with the help of the American Dental Association, EPA, NACWA, and local mandatory/voluntary amalgam programs. Yes, this rule will provide an impact to the dental sector but it will provide a greater impact on the local Pretreatment programs. Stephanie Gieck and I understood this because we have years of local Pretreatment implementation experience and understand the resources required for inspections/outreach, permit writing, compliance evaluation, and enforcement. The associated implementation activities related to 120,000 new categorical industrial users will be put on the collective backs of the Pretreatment programs (mostly local but also EPA and State) throughout the US.

Stephanie and I have ensured the workgroup identified this and, as a result, we have had more discussion related to the implementation of the rule than the workgroup expected. I believe we have come to a solution that will balance out these implementation requirements for the Pretreatment programs while providing effective control of the affected dental sector. Be prepared for the proposal when it is published in the Federal Register and provide comments.

Program Modification Strategy

The program modification strategy for Region 8 was updated and provided for the attendees of the EPA-Region 8 Pretreatment Association workshop in Bryce Canyon, UT. The strategy was also provided to Region 8 in a May email. The intent of this strategy is to provide guidance regarding the process and items needed for EPA to proceed with approval or public notice of your program modifications. Comments are still being gathered to ensure the regional Pretreatment programs have an opportunity to evaluate and provide input.

Like water, be gentle and strong. Be gentle enough to follow the natural paths of the earth, and strong enough to rise up and reshape the world. — Brenda Peterson

Issues

Gerry Fitzgibbons – City of Fort Collins

Regulation of Food Grease

CDHPE is in the process of promulgating regulations for the handling of food grease. These regulations will require registration for waste grease transporters and treatment facilities. In some cases, registration may be required by those who collect waste grease for personal use. These regulations will not directly affect POTWs. CDPHE is holding stakeholder meetings to solicit input. Places and times of meeting are given in the following table.

Date	Time	Location (Note NEW Locations)
Thursday, July 14, 2011	1:30 - 3:30 pm	CO Dept. of Transportation (CDOT) Auditorium, 4201 E Arkansas Ave, Denver map
Wednesday, July 27, 2011	1:30 - 3:30 pm	CO Dept of Public Health and Environment, Sabin-Cleere Room, Building A map
Thursday, Aug 18, 2011	1:30 - 3:30 pm	Daniels Fund, 101 Monroe St, Denver map
Thursday, Sept 1, 2011	1:30 - 3:30 pm	CO Dept of Public Health and Environment, Sabin-Cleere Room, Building A map
Thursday, Sept 15, 2011	1:30 - 3:30 pm	CO Dept. of Transportation (CDOT) Auditorium, 4201 E Arkansas Ave, Denver map

Further information, including a draft of proposed regulations may be found at

<http://www.cdphe.state.co.us/hm/wastegrease/index.htm>

Chemical Cremation

On April 6, 2011, the Governor signed an act modifying requirements for disposal of human remains. The definition for cremation was broadened to allow for chemical treatment of human remains. The process is called alkaline hydrolysis, and is already used for animal remains. It uses sodium or potassium hydroxide and heat to break down biological materials. POTWs should be aware that the resulting wastewater may be very high in BOD, and has the potential to exceed local pH limits. The units that are sold for human remains are marketed by Resomation Ltd. Their web site can be found at

<http://www.resomation.com/>

While I am not aware of any Colorado funeral homes that yet use this procedure, here in Fort Collins, we regulate CSU's tissue digester. It is a similar process, but on a much larger scale, and is used for animal remains. If you have any questions about our experiences in regulating this waste, please call me at (970)221-6952.

“Water has no taste, no color, no odor; it cannot be defined, art relished while ever mysterious. Not necessary to life, but rather life itself. It fills us with a gratification that exceeds the delight of the senses.”
- Antoine de Saint-Exupery (1900-1944), Wind, Sand, and Stars, 1939



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Striving to make the environment a cleaner, safer place for today's and future generations.

www.cipca.org

Extra Pictures!!



Top Left: Delicate Arch – Arches National Park
Top Right: Hoodoos – Bryce Canyon National Park
Bottom: View from the top of Angels Landing – Zion National Park

A Very Special Thank You to the Following:

Bill Thomas

CIPCA Chair, City of Loveland

Al Garcia

US EPA Region 8, Water Program Office of Pollution Prevention /
State & Tribal Assistance

Gerry Fitzgibbons

City of Fort Collins PreTreatment Specialist
CIPCA Issues

Without your contributions we would have no Newsletter!

Help Your Editor!!

Now is the time for improving the CIPCA Newsletter and website to better suit the needs of our general membership.

Are you familiar with web site design?
We could use your help!

All ideas are welcomed!
All entries are encouraged!

Please submit articles. Without content, there is no newsletter, and we are always willing to showcase new work!

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Upcoming CIPCA Events

CIPCA has scheduled a general membership meeting, followed by a tour of Airvac Services, Inc. for Thursday August 18 at 1:30PM. This facility treats and disposes of nonhazardous solids, semi-solids and liquid wastes that are pumped and transported to their facility from off-site industrial/commercial locations.

****Space will be limited for this tour and safety glasses are required. First come first serve so sign up today!****

CIPCA is also busy planning our Fall Conference that will take place October 20, 2011 so set aside that date!

<http://www.facebook.com/#!/pages/Colorado-Industrial-Pretreatment-Coordinators-Association/104808416256698>