

Lee County

Best Management Practices for Mercury Waste Management in Hospitals



Prepared by Lee County Industrial Pretreatment Program for the
control of mercury discharged to the sanitary collection system
by Hospitals.

April 2019

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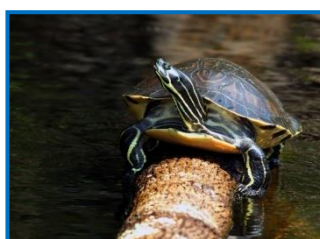
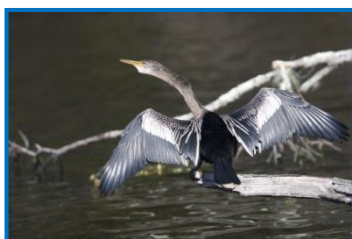
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Introduction

The Lee County Mercury Best Management Practices (BMPs) for Hospitals are designed to prevent pollution, and assist hospitals in the proper management of mercury and mercury waste in their day-to-day activities.

This best management practices booklet contains a set of **recommended operating procedures and guidelines** designed to reduce the amount of mercury discharged to the Lee County sanitary sewer system, a publicly owned treatment works (POTW). Proper implementation of these procedures is intended to protect Florida's natural environment from the discharge of hazardous mercury-containing compounds.



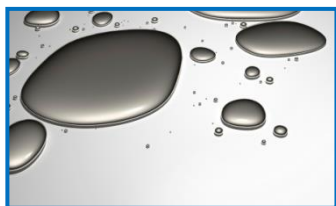
Hospitals have a responsibility not only to their patients, but to their communities, and can play an active role in preventing illness. Two ways to do this are through recycling and reducing the use of hazardous materials in the facility. When mercury is spilled, it is exposed to air and evaporates into an invisible, odorless toxic vapor. Acute and chronic exposures to mercury can negatively impact cognition, personality, sensory, and motor functions.

This manual identifies certain practices that hospitals should follow. These recommendations are summarized at the end of each topic as **BMP Summary Recommendations**. In addition, guidance is given on practices that offer environmentally preferable practices for hospitals and may help save money through waste minimization. These will be summarized in each section under the heading, **"Consider the following."**

BMP #1 – INVENTORY AND DISPOSAL

Mercury Inventory

All hospitals should complete a mercury products inventory. Mercury is typically found in many areas in hospitals. Items such as thermometers, sphygmomanometers (blood pressure cuff), thermostats, switches, gauges, batteries, light bulbs, laboratory stains, and solutions can all contain mercury. Mercury in broken or outdated equipment is often improperly discarded as red bag waste or trash and sent to the incinerator. Incineration causes mercury vapors to escape into the air, starting a trail of pollution with the smallest creatures at the bottom of the food chain and ending with those at the top, like humans. Some rooms and offices may still have supplies of elemental mercury tucked away in a storeroom. This supply, especially if it is forgotten or poorly managed, exists as a potential risk to the environment, patients and employees and can be very expensive to clean up.



Elemental Mercury is highly toxic to organisms at the wastewater treatment plant. Mercury is also heavy and can become stuck in sink traps, creating a health risk. **Do not pour mercury down the drain.** Properly dispose of or recycle elementary mercury, mercury compounds, and mercury containing instruments and products.

**1 gram of
mercury**

There is enough mercury - about 1 gram - in 20 fluorescent light bulbs to contaminate a day's supply of drinking water for 1 million people.

It is always more cost effective to dispose of mercury than clean it up. Make sure all discarded mercury thermometers and other mercury devices are stored in non-breakable containers and are secured in an air-tight locked container until they are properly disposed of or recycled.

Recycle all unused free mercury. Many hazardous waste haulers will accept elemental mercury for recycling.

BMP #1 Summary Disposal Recommendations

- **Never discard elemental mercury in any sink or drain, sharp container, biohazard waste bag (red bag) or trash.**
- **Always recycle or dispose of all mercury-containing materials through a licensed mercury waste recycler or handler.**

Consider the following:

- ✓ **Use non-mercury alternatives to reduce the risk of an elemental mercury spill.**
- ✓ **Designate all sinks as “Sanitary Use Only – No Chemical Disposal” to eliminate any chance of accidental discharge in the sink.**

BMP #2 – MERCURY ELIMINATION & RECYCLING

All hospitals should have an action plan in place to eliminate mercury-containing items found as a result of the inventory. Instruments and products such as thermometers or blood pressure cuffs can easily be replaced with non-mercury alternatives.

Using Substitutes:

- Alcohol and electronic **thermometers** are readily available and sufficiently accurate.
- Aneroid **blood pressure devices** are just as effective as the mercury versions.
- Electronic **thermostats** and non-mercury **switches** are also widely available. For items with no alternatives, properly *handle*, *store*, and *recycle* to prevent spills. For immobile items such as thermostats or switches, place labels indicating they contain mercury so when they need to be replaced they can be properly handled and disposed of.



Eliminating Mercury:

Contact your county's solid waste department to determine if a hazardous waste program is available for hospitals. If one is not available, contact a hazardous waste contractor or recycler. You can also contact the manufacturer of the product; many will recycle the item for free, especially if you purchase the mercury-free alternative from them. Review fluorescent light bulb information on the proper recycling of used bulbs.

Use video and power point presentations to show employees the hazards of mercury properties in order to eliminate hands on access to mercury. Visit <http://www.osha.gov/SLTC/mercury/index.html> to find out more about proper handling of mercury.

Implement and enforce a no-mercury policy to prevent the purchase of mercury-containing items if alternatives exist and to prevent mercury from entering the hospital or medical facility.

BMP #2 Summary:

- **Use non-mercury alternatives when available.**
- **Label immobile items.**
- **Implement and enforce a no-mercury policy.**
- **Dispose of used light bulbs, and other mercury containing items through a licensed mercury waste recycler or handler.**

Consider the following:

- ✓ **Have the hospital take a Mercury-Free Zone Pledge.**
- ✓ **Include a Mercury-Free Purchasing Policy.**

BMP #3 - ENVIRONMENTAL RELEASE

Spills

It is important to be prepared for a mercury spill. Spilled mercury can evaporate at room temperature and be inhaled; it can also spread long distances and settle in cracks and porous materials like cloth, carpet, or wood, slowly emitting vapors over a long period of time. Keep everyone away from contaminated areas. Even small amounts of mercury can pose a risk to human health and the environment. Exposure to mercury by inhalation is of particular concern in managing a spill.



Clean Up

Designate a **professional spill cleanup firm** to respond or designate a competent trained staff person to be immediately notified in case of a spill. This person should be properly trained in the appropriate use of a mercury spill kit, cleanup procedures, required personal protective clothing, decontamination and disposal. Mercury spill kits are available from companies that specialize in Occupational Safety and Health Administration compliance supplies. Before purchasing a make sure it includes complete instructions on how to perform a spill clean-up. Train staff members in proper cleaning procedures.



kit,
spill

Establish emergency plans for small spills (less than 2 tablespoons) and for large spills (more than 2 tablespoons or one pound), consider hiring a professional spill response company to provide help for large spills or if mercury contaminates carpeting or porous flooring. Do not handle mercury in carpeted areas because it is very difficult to collect all of the contaminants if there is a spill. In the event of a mercury spill, put on nitrile gloves (do not use latex gloves as mercury can penetrate latex) along with other appropriate proper protective equipment and clean it up

immediately. Never use a vacuum cleaner, mop or broom to clean up a spill. A vacuum cleaner has the potential to spread mercury dust and/or vapor throughout the area in the vacuum exhaust. Heat from the motor will also increase the amount of mercury vapor in the air. Mops and brooms will spread the mercury, making proper cleanup more difficult and costly.

Prevent spills by storing items in secure locations until the items can be properly disposed of or recycled. Make sure mercury-containing products are well protected against breakage. Double bag any item containing liquid mercury and then place bag in a covered non-breakable container.

BMP #3 – Summary Environmental Release Recommendations

- **Be prepared for a spill.**
- **Only have OSHA trained staff handle any spill regardless of size.**
- **Prevent spills through proper storing.**

Consider the following:

- ✓ **Require all personnel who may come into contact with mercury-containing materials to review the Occupational Safety and Health Administration's proper mercury safe handling and disposal procedures at the OSHA Web site:**

<http://www.osha.gov/SLTC/mercury/index.html>

BMP #4 - RECORDS

Hospitals should maintain a written or electronic log of all completed inventory lists indicating where all mercury is located or stored in the hospital. In addition, retain receipts, shipping manifests and other certified documentation from the



recycler or hazardous waste hauler of all mercury waste recycling and disposal shipments. These documents should be kept on file for at least **three years**, and should be made available to authorized Lee County inspectors upon request.

BMP #4 - Summary Records Recommendations

Retain the following records for three years:

- ✓ **Completed mercury inventory list**
- ✓ **All waste recycle/disposal receipts and shipping manifests.**
- ✓ **Documentation for all employees attending annual training**

**1 gram of
Mercury**

A tiny speck of mercury - the size of the period at the end of this sentence - can contaminate a 36-ounce fish. This is about 1/100 of a gram.

BMP #5 - TRAINING

Proper knowledge and handling of mercury and all items containing mercury is vital to preventing accidental exposure and release of hazardous materials into the environment. A proper training program should include all five of the Lee County Best Management Practices included in this manual.

Anyone who handles or has the potential to come into contact with mercury-containing materials should be trained in these BMPs for proper mercury waste handling requirements. Help raise awareness about mercury safety by educating employees to have an awareness and understanding of the pervasiveness of mercury in their work place, communities, and environment and how and why this is an environmental and health concern.

BMP #5 Summary Training Recommendations

- **Use these [POTW] Best Management Practices to teach proper handling techniques to all staff who may come into contact with mercury-containing materials.**

Consider the following:

- ✓ **Consider educating employees about mercury through pay check/stub notifications and posters in the work place.**
- ✓ **Include Mercury education at annual training workshops.**

For additional copies of this guide or more information, please visit our web site:

<http://www.leegov.com>

Or contact:

**Lee County's Industrial Pretreatment Coordinator
1500 Monroe Street 3rd Floor
Fort Myers, FL 33901
(239) 533-8181**

Appendix A

Mercury Checklist for hospitals

Mercury Audit: Assessment Checklist for Hospitals

Item	No	Yes	Use?	How Many/ How Much?	Location?
Liquid mercury					
Mercury thermometers					
Mercury barometers					
Mercury vacuum gauges					
Mercury spectral tubes					
Mercury molecular motion device					
Center tubes					
Feeding tubes					
Mercury oxide					
Mercury (II) chloride					
Miller abbot tubes					
Mercury nitrate					
Mercury iodine					
Mercury fever thermometers					
Sphygmomanometers (blood pressure devices) - with silver liquid					
Laboratory ovens					
Fluorescent lamps (bulbs)					
Mercury thermostats					
Various types of lamps (light bulbs: mercury vapor, metal halide, high-pressure vapor sodium, high intensity discharge (HID))					
Mercury Gauges					
"Silent" light Switches					

Item	No	Yes	Use?	How Many/ How Much?	Location?
Mercury float control switches (e.g., on sump pumps)					
Flow meters with mercury switches					
Other equipment with mercury switches (e.g. fire alarms, safety valves)					
Older fungicides and pesticides (manufactured prior to 1991)					
Latex paint (manufactured prior to 1992)					
Mercury cooking thermometer (kitchen)					
True vermilion paint (contains mercuric sulfide)					
Mercury oxide/mercury zinc batteries (old alkaline type, prior to 1996 and button batteries)					
Other					

Appendix B

Lee County Industrial Pretreatment Program

PROHIBITED DISCHARGES

General Prohibited Discharges. No user shall discharge, permit the discharge, cause the discharge, or contribute to the discharge of any pollutant or wastewater that will interfere with the operation or performance of the WWF or otherwise pass through the WWF. These general prohibitions apply to users of the WWF whether or not the user is subject to National Categorical Pretreatment Standards or any other National, State or Local pretreatment standards or requirements.

Lee County Ordinance 12-03 contains general and specific discharge prohibitions applicable to all dischargers. You can access and download a copy at

<https://www.leegov.com/bocc/Ordinances/12-03.pdf#search=Ordinance%2012%2D03>

Appendix C

Lee County Local Limits

Pollutant	Local Limit (mg/L)
1. Arsenic	0.13
2. Cadmium	0.079
3. Chromium	3.9
4. Copper	5.5
5. Cyanide, Total	0.78
6. Lead	0.31
7. Mercury	0.041
8. Molybdenum	0.25
9. Nickel	0.35
10. Selenium	0.15
11. Silver	1.4
12. Zinc	0.31
13. Carbonaceous Biochemical Oxygen Demand (CBOD)	857
14. Nitrogen, Total (TKN)	172
15. Phosphorus, Total	32
16. Total Suspended Solids (TSS)	383

Appendix D

Acknowledgements/Helpful Links



<http://www.epa.gov/region9/waste/p2/projects/hospital/mercury.pdf>



http://www.dep.state.fl.us/waste/quick_topics/publications/shw/hazardous/mercury.pdf



<http://www.osha.gov/SLTC/mercury/index.html>