San Francisco Department of Public Health Green Programs



Medical/Dental/Veterinary Clinics (not full hospitals) Compliance Applicability Guide

Medical/Dental/Veterinary Clinics are regulated by several agencies*. They are regulated by the San Francisco Department of Public Health (SFDPH) Hazardous Materials Unified Program Agency (HMUPA) for storage of compressed gases, cleaning products, disinfectants and maintenance chemicals; for generating medical or hazardous waste; and for X-Ray waste containing silver. Businesses with autoclaves using ethylene oxide sterilizing agents (ETO) and medical specialty gases may need permits from the San Francisco Fire Department (SFFD).

San Francisco Public Utilities Commission (SFPUC) requires Class II discharge permits for dentists, while medical clinics must comply with general discharge limits. SFPUC also regulates amalgam separators and silver recovery units for X-Ray waste management. Air compressors require a CalOSHA permit.

*Note: This is not a complete list of local regulatory requirements.

See detail below for common activities and storage situations that require compliance by your San Francisco facility and where to get compliance help or obtain required permits/registrations:

SFFD, Bureau of Fire Prevention, 698 2nd St., SF, CA 94107 415-558-3303 www.sf-fire.org

- Sterilizing agents: autoclaves using ethylene oxide (ETO) if storage/use over 200 cf
- Compressed gas storage: flammables require permits if over 200 cf, oxygen if over 504 cf
- Back-up generator: diesel storage over 25 gals in a building, over 60 gals outside building
- Storage/use of over 5 gallons of flammable liquids inside building, over 10 gals outside
- Storage, use, dispensing, transporting or handling of other hazmats (amounts vary per type)

SFDPH- HMUPA, 1390 Market St., Ste. 210, SF, CA 94102 415-252-3907/ 415-252-3922 www.sfdph.org/dph/eh/

SF Health & Safety Code, Articles 21, 21A, 22, 24 and 25; CA H&SC and CCR

- Over HMUPA thresholds of hazardous materials (55 gal liquid, 500 lbs solid, 200 cf gas):
 compliance certificate required
- Medical specialty gases such as oxygen, nitrous oxide and nitrogen at 200 cf and over: registration required, but exempt from annual requirements for <1000 cubic feet of gasses
- Sterilizing agents such as glutaraldehyde or autoclaves using ethylene oxide (ETO)
- Generate hazardous waste: compliance certificate required
- Treat hazardous waste: compliance certificate and grant of authorization required
- Generate medical waste: filing, registration, or permit required depending on amount generated and disposal/treatment method
- X-Ray hazardous waste management and silver recovery units
- Universal Waste generation and collection: must be handled in accordance with current state and/or federal laws.

SFPUC Wastewater Enterprise, Pretreatment Source Control Program, 3801 3rd St., Ste. 600, SF, CA 94124

415-695-7310 www.sfwater.org

- Dentists are required to obtain Class II General Wastewater Discharge Permits (and associated SFPUC inspections) and must comply with wastewater discharge limits and prohibitions set forth in SF Municipal Code Section 123 of Article 4.1, Chapter X, Part II as well as DPW Order #158170.
- Medical clinics must comply with the wastewater discharge limits set forth in the SF Municipal Code (Section 123 of Article 4.1, Chapter X, Part II), as well as those in DPW Order #158170. No specific permits are issued, but facilities may be inspected if violations are suspected or reported.

BAAQMD, Engineering Division, 939 Ellis St., SF, CA 94109 415-771-6000 www.baagmd.gov

• Back-up generator permit: fixed over 50Hp or 37Kw

Environmental Health

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Other

- X-Rays- Radiologic License required by CA Dept Public Health, Radiologic Health Branch http://www.cdph.ca.gov/programs/Pages/RadiologicHealthBranch.aspx
- Air compressor- CA Dept of Industrial Relations (CalOSHA) permit http://www.dir.ca.gov/dosh/