

November 26, 2014

Genesee County Drain Commissioner – Division of Water and Waste Services (GCDC-WWS) is sending this letter in response to questions we have been asked regarding the discharge/disposal of human wastes from the treatment of a patient known or suspected of having Ebola.

Your Nondomestic Wastewater Discharge Permit is the authorization for discharge to our wastewater system and any discharge from your medical facility must conform to the conditions in this permit. Any human wastes discharged to the wastewater system should be limited to the type of wastes normally introduced to the system, such as urine and feces. Regulated medical waste should not be flushed or otherwise introduced into the wastewater system, regardless of the nature of the patient's disease condition.

GCDC-WWS staff has reviewed CDC's Interim Guidance for Environmental Infection Control in Hospitals for Ebola Virus (Interim Guidance), and have conferred with the Michigan Department of Community Health (MDCH) and the Michigan Department of Environmental Quality (MDEQ). The Interim Guidance expressly approves of discharging human waste from the treatment of Ebola patients to sanitary sewer systems. Although MDCH may agree the MDEQ has not taken a position on this question, and we know of no statute, regulation, standard, or recommended practice administered by the MDEQ or MDCH that would contradict or limit the position of the Interim Guidance.

It is our understanding the position articulated in the Interim Guidance regarding discharges of human waste to sanitary sewers is based on the premise that Ebola is not known to be a waterborne disease and that modern wastewater systems are designed to treat and disinfect pathogenic water pollutants. With this said, additional precautions should be taken to limit the possibility of exposure to pathogens prior to the wastewater being fully treated and ready for discharge.

GCDC-WWS has the following recommendations:

1. Your planning should include efforts to minimize the possibility that wastewater affected by the treatment of Ebola patients might back up or overflow from the hospital plumbing and the connecting sewer.
2. Provide us advance notice when the hospital expects that an Ebola patient is being treated. Our field staff currently takes precautions against exposure to waterborne pathogens that are more easily communicated than Ebola, but advance notice would allow the workers to exercise an extra measure of care. Similarly, your staff or your contractor, in the process of collecting samples for your self-monitoring reports, should be cautioned to use appropriate care and personal protection equipment.

3. Consider dosing any human waste associated with Ebola patients with an appropriate volume of disinfectant before flushing or otherwise introducing it into the sanitary sewer system. In this regard, we suggest that the disinfectant be one recommended by the Interim Guidance.

4. Continue to closely monitor the status of CDC recommendations. We expect that these recommendations may evolve rapidly as hospital systems gain experience with the issues involved in managing Ebola patient care.

If you have questions or need more information concerning the status of your Nondomestic Discharge Permit I can be contacted at [lmilton@gdcwws.com](mailto:lmilton@gdcwws.com) or by phone at (810) 232-7662.

Respectfully,

Lisa Milton  
Environmental Compliance Supervisor  
Division of Water and Waste Services

Relevant links:

<https://www.osha.gov/SLTC/ebola/index.html>

<http://www.michigan.gov/emergingdiseases/0,4579,7-186-69879---,00.html>

<http://www.cdc.gov/vhf/ebola/>

<http://www.gdcwws.com>