

INTEROFFICE MEMORANDUM

HSEF 2001-32

DATE:

December 5, 2001

TO:

County Health Department Directors/Administrators

Environmental Health and Engineering Directors

THROUGH:

Sharon Heber, Dr. P.H., Director,

Division of Environmental Health

FROM:

Eric J. Grimm, Chief Oftim

Bureau of Facility Programs

SUBJECT:

Department Policy DOHP 305-001-01.

INFORMATION ONLY Policy DOHP-305-001-01

After careful review by the Bureau of Facility Programs and the Bureau of Onsite Sewage Programs, the Department of Health has established a policy for the use of transportable wastewater containers and cassette-type toilets. A copy of the policy is enclosed. The effective date of the policy is December 3, 2001. Please ensure that field staff in the mobile home park program is aware of the policy.

Also enclosed is a Model Spill Cleanup Protocol for those parks or camps that elect to participate in the transportable wastewater container and cassette-type toilet methods of wastewater disposal.

Questions concerning the policy may be addressed to Ken Widergren at SC 205-4444 ext. 2453 or at (850) 245-4444 ext. 2453.

Attachments

DOHP 305-001-01

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I. Policy

The Florida Department of Health approves the use of transportable wastewater containers at recreational vehicle parks and recreational camps with both tent and recreational vehicle spaces. This policy also allows for the use of the cassette-type toilets used in camping. Approval of the practice is contingent upon the following:

- A. Only the waters from bathing, hand washing, and kitchen sinks may be transported in transportable wastewater containers. These containers must be sealed prior to leaving the campsite and spills reported as detailed in (E).
- B. Cassette-type toilets are approved for the transportation of toilet waste provided they are sealed prior to transportation and spills are reported as detailed in (E).
- C. The owner/operator of the park or camp must agree to the use of these containers, and must provide signage or otherwise notify the residents and guests in writing of the park/camp requirements about such use.
- D. No toilet wastewater may be transported from recreational vehicles except as described in (B) above.

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E. Guests and residents of parks or camps allowing the use of the transportable containers must be informed of the designated park employees who are to be contacted in the event of a spill. Spills are to be reported immediately to the designated park employees. The designated park employees must disinfect spills immediately.

II. Authority

Subsection 381.0011(2) F.S.

III. Supportive Data/Resources

The Division of Environmental Health reviewed the issue of disposal of wastewaters by means of transportable wastewater containers on wheels (frequently referred to as "blue-boys"). Staff also looked into the wastewater needs for tent campers and pop-up tent campers. Cassette-type toilets are frequently used in pop-up campers. The toilet employs the use of a removable portable plastic holding device and is transported by a person to a disposal area. The bureau chiefs of Facility Programs and Onsite Sewage Disposal worked with the Division Director to re-evaluate the scope of the problem and to develop an agreeable policy for most concerned parties. In concert with the Department of Environmental Protection's Division of Parks and Recreation, which supports the use of these containers, DOH sought common ground on which to build the policy.

IV. Signature Block with Effective Date

John O. Agwunobi, M.D., M.B.A.

Secretary

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Definitions

- A. Approved sewage disposal system: A means of disposing human waste that is operated, constructed and used in accordance with Chapter 64E-6, FAC, or Chapter 62-600, FAC.
- B. Blue-boy: A trade name that has become synomonous with portable plastic transporting wastewater containers, usually blue in color, employed for the purpose of relaying wastewater from recreational vehicles to sanitary dump stations.

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- **C.** Cassette-type toilet: Made up, in part, of a plastic portable container that is sealed for transfer from the toilet to an approved sewage disposal system.
- Disinfection process: A procedure usually requiring chemical lime (or other chemical and biological substances) to neutralize the pathogenicity of spilled wastewaters. In neutralizing toilet water, lime must be dispersed into the spilled wastes. Park management must inform all residents and guests of the disinfection process.

VI. Protocol

Each park or recreational camp regulated by the Department of Health may choose to allow transportable wastewater containers and cassette-type toilets consistent with this policy. Park or camp management shall notify patrons at the time of registration if the establishment elects to follow this policy. A procedure shall be established to disinfect spills. Facility management shall inform guests and residents of the name of the contact person(s) and the method of contacting management in the event of spills. Spills are to be reported immediately to the facility's management.

County health department staff shall inquire at the time of inspection if the park or camp is participating in the policy.

VII. Procedures

The facility's management telephone number (s) or other contact information shall be provided to park guests and residents. When spillage occurs, the transporter shall immediately report the spill to management.

Disinfection, such as lime stabilization of the spilled contents, shall begin as soon as possible by management.

Park or camp management is responsible for the final disposal of the spilled contents.

VIII. Distribution List

County Health Department Directors/Administrators
Department of Environmental Protection, Division of Parks and Recreation
Florida Association of Recreational Vehicle Parks and Campgrounds
American Camping Association
Christian Camping Association
Boy Scouts of America
Girl Scouts of America
Department of Health General Counsel's Office
Florida Association of Recreational Vehicle Retailers
Policy Library
Web Manager

IX. History Notes

This policy supersedes the 1996 interpretations related to transportable wastewater containers made during the training classes on Mobile Home, Lodging, Recreational Vehicle Parks and Recreational Camps, 64E-15, F.A.C.

December 3, 2001

Model Spill Cleanup Protocol for RV Parks Allowing the use of Transportable Wastewater Containers and Cassette-type Toilets

Scope:

This model protocol outlines the equipment necessary and the clean-up procedures necessary to provide a reasonable level of safety in the event of a wastewater spill from a transportable wastewater container or cassette-type toilet.

Materials Required:

Signage:

A sign at the registration desk to alert occupants that the management allows the use of transportable wastewater container and cassette-type toilet.

Temporary, weather resistant, signs or barriers warning of a spill (Do not Enter sign, cones, tape, etc.)

Information:

The phone number or physical location of the park or camp's staff to notify in the event of a spill.

Immediate warnings or instructions for actions the occupant should take to protect park or camp occupants before staff can respond.

Spill Clean-up Equipment:

Broom

Rake

Shovel

Bucket

Rubber gloves

Dust mask

Hydrated Lime or Garden Lime

Sand, sawdust or other absorbent material

Recommended Clean-up Procedure:

Persons performing the cleanup should wear rubber gloves and a dust mask.

Erect any necessary barriers to divert foot or vehicle traffic around the spill site.

Apply a layer of lime over the entire spill site.

Remove as much of the spilled material as possible and place it into a bucket or other suitable container. Any visible solid waste material or litter must be removed from the spill site.

If the removed material does not contain an abundance of dirt and debris, it may be flushed into the dump station. If the removed material contains an abundance of dirt and debris, mix the material with an abundant quantity of lime and absorbent material. The mixed material can be bagged for disposal as solid waste.

If washing the residues remaining at the spill site will facilitate cleanup or help to prevent contact, they may be washed off of the contaminated surface using water and a broom.

All remaining residues shall be limed and may be incorporated into the soil using a rake or other device.

The contaminated soil and remaining residue may be bagged for disposal as solid waste or may be left in place.

The spill area should be marked to prevent foot or vehicular traffic for at least 24 hours after no visible moisture remains. The type of markers or barriers should be selected with a consideration of the quantity of traffic anticipated, the age of the people that might be in the area of the spill, and the proximity of the spill to traffic areas, play areas and other areas of frequent use.

The county health department should be notified within 12 hours of any spill within 75 feet of a well or surface water or any spill event that results in occupant contact with the spilled material.

The clean-up tools need to be rinsed off at the dump station and should not be used for any other purpose where they could contaminate otherwise 'clean' surfaces.

Actual procedures adopted by a park or camp need to address the following aspects:

Notification of occupants of the park's policy regarding the use of cassette-type toilet and transportable wastewater container.

Preventing traffic through spill sites

Safe disinfection, removal and disposal of spilled material

Safe disinfection, and possible removal of residual material

Segregation of clean-up tools

Notification of the county health department in the event of potential public health or environmental emergencies