Dental Office Amalgam Wastewater Compliance Program

On July 14, 2017, the US Environmental Protection Agency (EPA) Dental Effluent Guidelines (40 CFR 441) took effect. Dentists that place or remove amalgam are required to install amalgam separators and follow two Best Management Practices (BMPs). Existing dentists have three years to comply with the new regulations, but new facilities that start discharging after the effective date need to comply immediately.
Regional San is working to reduce mercury discharges to the Sacramento River, and the dental community is part of the solution!

Improperly disposed mercury can find its way into Sacramento waterways and the environment. In water, mercury can be converted to methylmercury, a more toxic pollutant. Methylmercury then accumulates in fish making them potentially harmful for people to eat.

Dental offices have been identified as major mercury contributors to wastewater treatment plants nationwide. By following the EPA required and industry-approved BMPs, dental offices will do their part to help reduce mercury in our waterways and the environment.

Who is affected?

**Dentists who place or remove amalgam must install an amalgam separator and implement BMPs.**

- This includes institutions, permanent or temporary offices, clinics, home offices, and Federal, state, or local government owned and operated facilities
- Dentists who never place amalgam and do not remove amalgam except in limited unplanned, unanticipated circumstances (estimated to be less than 5% of removals) must certify as such but do not have to install an amalgam separator or implement the BMPs.

**The following dentists are exempt from this regulation:**

- Dentists that exclusively practice one or more of the following specialties: oral pathology, oral and maxillofacial radiology, oral and maxillofacial surgery, orthodontics, periodontics, or prosthodontics
- Mobile units providing services in multiple locations
- Dentists that do not discharge amalgam wastewater to the sewer

What is required?

**Installation of an appropriately sized amalgam separator compliant with one of the following:**

- ISO 11143 Standard (2008) or subsequent versions with a minimum 95% removal efficiency
- An equivalent device may be used if it meets the requirements listed in 40 CFR 441.30(2)

**Implementation of the following BMPs:**

- Waste amalgam must not be discharged to the sewer
- Oxidizing or acidic cleaners, including but not limited to bleach, chlorine, iodine, or peroxide cleaners or cleaners with pH lower than 6 or greater than 8, must not be used to clean dental unit wastewater lines, chair-side traps, and vacuum lines

When is compliance required?

**No separator and not exempt?**

- If discharge from your facility started after July 14, 2017 comply immediately and submit a One-Time Compliance Report within 90 days
- If discharge from your facility started before July 14, 2017, comply by July 14, 2020, and submit a One-Time Compliance Report no later than October 12, 2020

**Separator installed prior to June 14, 2017?**

- Implement the required BMPs
- Submit a One-Time Compliance Report by October 12, 2020
- Replace the amalgam separator if not compliant by June 14, 2027, or whenever it needs to be replaced, whichever comes first

**Do not place and only remove amalgam in limited circumstances?**

- Certify as such through submittal of a One-Time Compliance Report by October 12, 2020
Resubmittal Triggers for One-Time Compliance Report, within 90 days

- Transfer of ownership of the practice (new owner must submit)
- Replacement of the amalgam separator
- Change in third party management of the amalgam separator (property owner or vendor)

Continuing Compliance Requirements

- Inspect the amalgam separator according to the manufacturer’s operating manual
- Repair or replace a malfunctioning amalgam separator within 10 days of being discovered
- Replace the amalgam retaining units in accordance with the manufacturer’s schedule or when it has reached the maximum level, whichever comes first

Recordkeeping

- Maintain the One-Time Compliance Report as long as the practice is in business or until ownership is transferred
- Maintain the following documents for a minimum of three years:
  - Inspection records
  - Documentation of amalgam retaining unit replacement
  - Disposal records
  - Documentation of any repair or replacement of the amalgam separator
  - Manufacturer’s operating manual
- For hazardous waste questions in Sacramento County, contact the Sacramento County Environmental Management Department, Environmental Compliance Division at (916) 875-8550, or in West Sacramento contact the Yolo County Environmental Health Division, Hazardous Materials Programs at (530) 666-8646.

To locate links to the regulations, other resources, or to download the Regional San One-Time Compliance Report, visit www.amalgamrecovery.com. If you have questions, email us at amalgamrecovery@sacsewer.com or call (916) 875-6470.