

Dental Amalgam Rule

What is it?

On June 14, 2017, the EPA published the rule in the Federal Register. Its main goal was to help minimize the amount of mercury being discharged by Dental practices to the environment through their wastewater discharge.

Who does it apply to?

Dental offices, including large institutions such as dental schools and clinics, that discharge to a wastewater treatment system.

Who does it <u>not</u> apply to?

- Mobile units
- Dental offices that exclusively practices one of the following dental specialties:
 - Oral pathology,
 - Oral and maxillofacial radiology,
 - Oral and maxillofacial surgery,
 - o Orthodontics,
 - Periodontics, or
 - o Prosthodontics; or
- Dental offices that do not place or remove amalgam; or
- Dental offices that do not remove amalgam, except in limited emergency or unplanned circumstances and are willing to certify to this; or
- Dental offices that do not discharge **any** amalgam process wastewater to the sewer system by collecting and transferring to an off-site facility.

What is required of dental facilities?

If it <u>does not</u> apply, a **one-time** certification will have to be submitted declaring that your facility falls into one of the above listed categories.

If it *does* apply, your facility must do the following:

- 1. Install, operate, and maintain an amalgam separator that meets ISO 11143 standard;
- 2. Submit a One-time Compliance Report;
- 3. Dispose of separator cartridges and/or scrap amalgam from side-chair traps through a certified disposal provider;
- 4. Retain maintenance and service records for amalgam separator for a minimum of three years;
- 5. Discontinue use of line cleaners that are oxidizing or acidic and that have a pH higher than 8 or lower than 6.

When does this become effective?

The rule became effective on July 14, 2017. The rule established distinct rules for both New Source and Existing Source dental offices.

What is the difference between a New Source and Existing Source?

Existing Source is any dental office that was established within the City of Greeley prior to July 14, 2017

- If the dental office that had an amalgam separator installed prior to June 14, 2017 that does not meet ISO 11143 standard, that office must meet the requirement by June 14, 2027.
- If the dental office had not installed an amalgam separator prior to June 14, 2017, that office must be within compliance by July 14, 2020.

New Source is any dental office that attempts to establish itself in the City of Greeley after July 14, 2017

- All new sources must install an amalgam separator that meets ISO 11143 standard prior to the discharge of any process wastewater.
- Additionally, the dental office must provide a One-time Compliance Report within 90 days of discharging amalgam process wastewater.

Why am I receiving this?

The Greeley Water and Sewer Department is required by law to implement this rule. As a potential regulated customer, we have gathered additional information from the Environmental Protection Agency and the American Dental Association regarding this required law. We have developed a One-Time Compliance Report and Certification Form to assist your business with compliance.

Where can I find additional information?

This information is available on the Greeley Water and Sewer Department web page:

http://greeleygov.com/services/ws/system/ipp

Additional information can be found on the ADA's website:

http://success.ada.org/en/regulatory-legal/amalgam

Your serious attention and response to meet this rule are necessary to keep your office and the Greeley Water and Sewer Department in compliance.

Greeley Water and Sewer Department encourages your business to call or write the Industrial Pretreatment Staff using information provided on the City's Water and Sewer Department web page (see above) should you have any questions or concerns.

Sincerely,

The Industrial Pretreatment Team City of Greeley WPCF 300 E 8th St Greeley, CO 80631