

Amalgam Fact Sheet

GUIDANCE REGARDING EPA DENTAL RULE COMPLIANCE

Dental Office Category – 40 CFR Part 441

On June 14, 2017, the United States Environmental Protection Agency announced pretreatment standards to reduce discharges of mercury from dental offices into a publicly owned sanitary sewer system, officially referred to by the EPA as Publicly Owned Treatment Works (POTW). This rule took effect on July 14, 2017.

Who does this rule apply to?

This rule applies to all dental offices with the following exceptions:

- Dental offices that discharge to POTWs that do not place or remove dental amalgam except in limited emergencies, or unplanned, unanticipated circumstances, are exempt and need only submit a one-time compliance certification to the Control Authority no later than October 12, 2020, or 90 days after a transfer of ownership.
- Dental dischargers that exclusively practice the following specialties are exempt from the rule:
 - Oral pathology
 - Oral and maxillofacial radiology
 - Oral and maxillofacial surgery
 - Orthodontics
 - Periodontics
 - Prosthodontics
- Mobile units are exempt from the rule.
- Dental offices that do not discharge their amalgam process wastewater into the POTW are exempt from the rule.

What does the rule require of dental offices?

- Dental offices that discharge to POTWs but do not place or remove amalgam need only submit a one-time report to the Control Authority or DEQ no later than October 12, 2020, or 90 days after a transfer of ownership. Your Control Authority is the City of Salem, Public Works Department, Environmental Services.
- Dental offices that place or remove amalgam must operate and maintain an amalgam separator and must not discharge scrap amalgam to the POTW (e.g., by disposing of amalgam via sink drains or toilets).
- Dental offices that are required to have amalgam separators are prohibited from using certain kinds of line cleaners that are oxidizing or acidic, including but not limited to bleach, chlorine, iodine or peroxide. The line cleaners used must have a pH range of 6.0 – 8.0.
- Existing dental dischargers (dental offices that were in operation before July 14, 2017) must comply with the rule by July 14, 2020.
- New dental dischargers (dental offices that begin operating on or after July 14, 2017) must comply with the rule immediately.
- Existing amalgam separators must be properly maintained and may be operated for their lifetime or ten years from the effective date of the rule (June 14, 2027), whichever is shorter. When a separator needs replacement, or the ten-year period has passed and the separator does not meet the standard of the final rule, a dental office must replace the separator with one that meets ISO 11143 (or ANSI/ADA 108-2009) standard (or equivalent) and a one-time compliance report.
- Existing dental dischargers must submit a one-time compliance report to the Control Authority or DEQ no later than October 12, 2020, or 90 days after a transfer of ownership. For new dental dischargers, a one-time compliance report must be submitted to the Control Authority or DEQ no later than 90 days following the introduction of wastewater into a POTW.

- The Dental facility subject to this rule must maintain the following documents and have them available for inspection in either physical or electronic form for a minimum of three years:
 1. Documents related to inspections of amalgam separators and follow-up actions.
 2. Documentation of amalgam retaining container or replacement, including date, if applicable.
 3. Documents related to dental amalgam pickup or shipment for proper disposal by a licensed storage or disposal facility.
 4. Documentation of any repair or replacement of an amalgam separator or device.
 5. Manufacturer's current operating manual for the device in place.

What form is used for the One-Time Compliance Report?

The City of Salem has adopted the DEQ form, the one-time compliance report for Dental Dischargers: <https://www.cityofsalem.net/CityDocuments/one-time-compliance-report-for-dental-dischargers.pdf>. This form will be used by all dental offices required to submit a one-time compliance report or One-Time Certification to their Control Authority or DEQ for compliance with the Dental Office Categorical Regulations.

How do I know where to send my One-Time Compliance Report?

- If you discharge into the City of Salem's wastewater collection system, or have received the one-time compliance report via mail or email, then your Control Authority will be the City of Salem, Environmental Services Section.
- If your business is outside of the City of Salem's wastewater collection system, then the Oregon DEQ may be your Control Authority. Consult the Oregon DEQ website for a list of Control Authorities and contacts.
- If your Control Authority is the City of Salem please send your completed forms to the following address:

Public Works Department
Environmental Services Section
1410 20th Street SE/Building 2
Salem OR 97302-1209

Related Links:

[Fact Sheet: Effluent Limitations Guidelines and Standards for Dental Offices \(PDF\)](#)

[EPA Dental Effluent Guidelines](#)

[Dental Amalgam Rule \(June 14, 2017\)](#)

[Frequently Asked Questions on the Dental Office Category Rule](#)