

AMALGAM RECYCLING REGULATIONS

- FOR THE DENTAL OFFICE

What the dental office needs to know.

All Dental Amalgam Traps are *required to be recycled*.



On September 25, 2014 the U.S. Environmental Protection Agency proposed technology-based pretreatment standards under the Clean Water Act (CWA) for discharges of pollutants into Publicly Owned Treatment Works' from existing and new dental offices that discharge dental amalgam. The new Rule aims to ensure that dentists who either place or remove amalgam properly collect and recycle the wastes generated from those activities.

The Rule emphasizes compliance, documentation AND enforcement. Previous mandatory programs (in some States) only emphasized equipment purchases and did not allow for inspection of offices or mandate other instruments of enforcement. This Rule is far more onerous as it emphasizes both compliance and documentation, as well as establishes mechanisms to inspect offices suspected of non-compliance.

In order to ensure oversight in the implementation of this Rule, EPA has created an entirely new classification of Categorical Industrial User (CIU) specifically tailored for the dental sector: Dental Industrial User (DIU). In order to obtain and maintain status as a DIU, dental dischargers must comply with the special monitoring and reporting requirements of the General Pretreatment Regulations (40 CFR § 441.60) and the applicable pretreatment standards for either new or existing sources.

Monitoring and Reporting Requirements in 40 CFR § 441.60:

- (1) Baseline Report
- (2) 90 Day Compliance Report
- (3) Periodic Monitoring Report: Report of ongoing compliance must be submitted annually

Applicable Pretreatment Standards (PSES or PSNS)

Pretreatment Standards for Existing Sources (PSES)

- (1) Removal of at least 99% of total mercury from amalgam process wastewater
- (2) Incorporation of the following Best Management Practices
 - a. All forms of scrap amalgam may not be flushed down the drain
 - b. Chair-side traps that may drain to a sewer must be cleaned weekly with non-chlorine bleach, non-chlorine containing cleaners that have a pH from 6-8
 - c. Certification that these BMPs are being followed

Pretreatment Standards for New Sources (PSNS)

Must meet the same requirements as designated for Existing Sources.

If the dental office does not meet the requirements to be treated as a DIU, under the proposed Rule, the Control Authority must treat the dental discharger as a Significant Industrial User. As a Significant Industrial User, the POTW Control Authority would be required to conduct the oversight duties applicable to SIUs: control mechanism issuance requirement, annual inspection and sampling requirements, and reviewing the need for a Slug Control Plan.

To assist your office in complying with all Local, State and Federal Amalgam Recycling Regulations

CALL DRNA AT

800.360.1001, EXT. 17

Compliance Experts are Available to Answer Your Questions and to Provide a Recycling Solution

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2200	Fits Air Techniques – Vacstar models, Den-Tal-Ez single models, Evac-u-Trap Ohmeda-Matrix all models, Turbine Industries, Techwest – Whirl Vac models, Vacudent – Workhorse single, Apollo, plus a number of other units
2300	Fits Dent-Tal-Ez dual models made after 1978 and Dentsply made after 1991
2350-FS	Fits Air Techniques – 1997 and later dual models, Vacudent – Workhorse dual, Apollo 2 hp, 3 hp single, tandem models, and VacStar Model 50, 80. New finer mesh screen.

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5506	Dispos-a-Trap - 2-3/4" - Pack of 144
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6100-C	Dispos-a-Trap - 2-1/2" - Pack of 144
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6400-C	Dispos-a-Trap - 1-5/8" - Pack of 144



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