

The DRNA Complete Guide to the EPA Dental Amalgam Rule



The rule explained
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FAQs



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UNDERSTANDING THE EPA AMALGAM RULE

The EPA Dental Effluent Guidelines, commonly referred to as the Amalgam Rule, was put into effect on July 14, 2017 with a compliance deadline of July 14, 2020.

On July 14, 2017 the US Environmental Protection Agency (EPA) finalized its new Rule regarding the handling and recycling of amalgam and its wastes.

According to the Agency, EPA issued pre-treatment standards under the Clean Water Act (CWA) for discharges of pollutants into publicly owned treatment works (POTW's) from new and existing dental practices that discharge dental amalgam waste. Mercury is a persistent, bio-accumulative pollutant with well documented neuro-toxic effects on humans. Dental amalgam contains mercury in a highly concentrated form that is easy to collect and recycle. Dental offices are the main source of mercury discharges to POTW's. ¹

The Rule aims to ensure that all dentists who either place or remove amalgam properly collect and recycle the wastes generated from those activities.

Emphasis is placed on compliance, documentation and enforcement. Previous mandatory programs (in some states) emphasized only equipment purchases and did not provide for inspection of offices or mandate other types of enforcement. This Rule is far more onerous as its emphasis is on demanding both compliance with proper recycling and documentation as well as establishing mechanisms to inspect those offices suspected of non-compliance.



Q: What if I don't place amalgam? Must I still comply?

A: The rule applies to anyone who either places OR removes amalgam.

WHO IS AFFECTED BY THE EPA RULE?

1. The rule applies to anyone who either places OR removes amalgam.
2. The rule covers permanent and temporary dental offices, hospitals, schools, clinics, mobile units and facilities owned by federal, state or local governments.
3. The rule requires the installation, maintenance, monitoring and recycling of an amalgam separator.

Amalgam Separators Must

- Be 2008 ISO 11143 certified to operate at a minimum of 95% efficiency.
- Be properly sized to incorporate all the wastewater that may pass through it.
- Amalgam separators must be recycled according to manufacturer's guidelines.
- Be maintained so as not to allow for unprocessed wastewater to bypass the system and enter a drain.²

SCRAP AMALGAM

What is scrap amalgam and how shall it be handled?

In addition to amalgam separators being required to be installed, the regulation mandates dental offices to comply with all ADA Best Management Practices (BMP's) regarding the recycling of "scrap amalgam" (also known as waste amalgam).

Scrap amalgam includes both contact and non-contact amalgam, and they are both prohibited from being discharged into POTWs according to this regulation.³

The following are all considered scrap amalgam and need to be recycled:

- Amalgam capsules
- Chairside traps
- Teeth with amalgam
- Excess mix or carvings
- Vacuum traps

Containers recycling scrap amalgam must be:

- Leak proof
- Rigid
- Labeled with a bio-hazard symbol
- Have a tight fitting lid only opened to place materials inside.

***** Please note that scrap amalgam and items containing it *MUST* be recycled at least *ANNUALLY*.**



Amalgam Capsules



Scrap Amalgam



Evac-u-Traps

FAQs

According to the EPA, the average cost to install an amalgam separator is approximately \$1,172.50 (not including scrap amalgam recycling) in 2016 dollars.⁴

Frequently Asked Questions

Q: What is the deadline for compliance?

A: Dental offices that discharge wastewater to a POTW must comply by July 14, 2020. If the dental facility's first discharge (i.e. new facility) is after July 14, 2017, then that facility must be in compliance with the standard immediately.

Q: Do I still need a separator if I do not place amalgam?

A: Yes, if you remove amalgam.

Q: What is the average cost of installing an amalgam separator?

A: According to the EPA, the average cost to install an amalgam separator is approximately \$1,172.50 (not including scrap amalgam recycling) in 2016 dollars.⁴

Q: What is the average cost of maintaining the amalgam separator per year?

A: The EPA states that the average annualized recurring costs to maintain and recycle (based on only one recycling per year) were \$588.75, in 2016 dollars.⁴

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FAQs

A one-time compliance report must be sent to the EPA by October 12, 2020.

If you are inspected, you must show a waste receipt provided to you annually by your recycler.

Frequently Asked Questions

Q: What standard should my amalgam separator comply with?

A: The ISO 11143 2008 standard.

Q: How will the EPA know if I'm complying?

A: A one-time compliance report must be sent to the EPA by October 12, 2020 and if you are inspected, you must show a copy of the annual compliance certificate provided to you by your vendor.

Q: Where do I get the one-time compliance report for dental dischargers?

A: Your local control authority.

Q: Who is my local control authority?

A: Your local control authority could be your local waste water utility, a state environmental agency, or a U.S. EPA regional office.

Q: What if the dental facility transfers ownership?

A: The new owner must submit a new one-time compliance report to the Control Authority by October 12, 2020. If the transfer occurs after July 15, 2020, then the new owner must submit the report 90 days after the transfer.

DRNA's SOLUTION

FREE Amalgam Separators



- Free unit (\$850 value) with service agreement
- Flexible Delivery – Can elect to receive in 2019 or in 2020, with bill not until one year from installation
- Low cost annual recycling fee
- Prices locked in for 3 or 5 years
- Predictable cost
- No monthly inspection required
- Annual pickup and replacement
- Compliance Certification

Annual Scrap Amalgam Recycling



- Picked up annually or once filled, whichever comes first (as per ADA Best Practices)
- Container shipped out when ordered
- Fill throughout the year with scrap amalgam
- On Demand Pickup & Pre-paid return or shipping
- Waste Recycled at a US EPA Certified Facility
- DRNA's Signature Assurance Program provides a Complete Audit Trail for Collected Waste
- Compliance Certification

References

1. Environmental Protection Agency. Effluent Limitations Guidelines and Standards for the Dental Category. Accessed October 19, 2017. pg 1.
2. Ibid. pgs 27, 34, 38-39, 71, 100-101.
3. Ibid. pgs 32, 38, 97-99, 101.
4. Ibid. pgs 19, 43-49. Data contained in tables on these pages were combined and simple averages were created across all categories of chair configurations. The numbers presented in this guidebook represent those averages.



The EPA expects compliance with this final rule to reduce the discharge of mercury by 5.1 tons each year. Mercury that would otherwise end up in the water supply.



**Thanks for being
part of the
solution!**

Useful Links

[The EPA Regulation](#)

[ADA's Best Management Practices for Amalgam Waste](#)

[DRNA's Website](#)

Questions?

(800) 360-1001 Ext.2

