

### A Dentist's Guide to the

# Dental Amalgam Program & Permit

## WHO IS REQUIRED TO PARTICIPATE?

Dentists who remove or place amalgam fillings and who practice in the San José-Santa Clara Regional Wastewater Facility service area are required to obtain a Dental Wastewater Discharge Permit and follow Best Management Practices.





ental wastewater may contain mercury, a toxin that affects the health of waterways, wildlife and people. The San Francisco Bay — the jewel of our region — has been designated as "impaired" by the Regional Water Quality Control Board (Water Board) due to high levels of mercury in fish, water and sediment. The Water Board and Federal Environmental Protection Agency (EPA) require Bay Area wastewater treatment facilities, including the San José-Santa Clara Regional Wastewater Facility (Facility), to implement programs that control mercury at its source.

Capturing mercury at its source and before it reaches the sewer system is the best way to reduce mercury pollution in both water and air. The Dental Amalgam Program for the eight cities and unincorporated areas served by the Facility requires dentists to implement practices aimed at keeping dental-related mercury out of the sanitary sewer system — and out of our Bay.

#### How does a dental practice comply?

STEP 1	STEP 2	STEP 3	STEP 4	STEP <b>5</b>
Apply for a Dental Wastewater Discharge Permit. Visit our website or call for an application.	Follow Best Management Practices (see inside).	Install an approved amalgam separator. Visit our website for a list.	Submit documentation certifying your compliance with the requirements (see checklist on back page).	Keep training, disposal and equipment records on site and available for inspection.



Amalgam waste includes contact amalgam such as extracted teeth containing amalgam restorations: noncontact or scrap amalgam; used, leaking or unusable amalgam capsules; and amalgam captured by chair-side traps, vacuum pump screens and other devices, including the traps, filters and screens themselves.

# Dentists help reduce mercury pollution with these Best Management Practices (BMPs)

These practices are required as part of your discharge permit.

Amalgam waste must NEVER be placed in the regular trash, placed with infectious waste (red bag), or flushed down the drain or toilet. The American Dental Association strongly recommends recycling amalgam waste as a best management practice for dental offices.

elemental mercury.
Bulk elemental mercury,
also referred to as liquid
or raw mercury, must be
recycled or disposed of
as hazardous waste. Use
only precapsulated dental
amalgam in the smallest
appropriate size.

2 Properly manage chairside traps. Change or empty chairside traps frequently and store the trap and its contents with amalgam waste. Never rinse traps in the sink. If you have reusable traps, make sure any material used to clean the trap is disposed of with amalgam waste.

- 3 Do not use peroxide, iodide, or chlorine-based products to clean vacuum lines. Do not use peroxide-, iodide- or chlorine-based products to clean vacuum lines, as these products have been shown to release the mercury in the amalgam. Line cleaners must have a pH between 6 and 8.
- 4 Properly maintain and dispose of screens.
  Change vacuum pump filters and screens as needed or as directed by the manufacturer and store with amalgam waste. Seal and store filters and screens and their contents (including any water that may be present) with amalgam waste in an airtight container.
- S Maintain the vacuum system.
  For dry vacuum turbine units, have a qualified maintenance technician, amalgam recycler or hazardous waste disposal service pump out and clean the air-water separator tank.

- Train staff and document training. Train staff in proper handling, management and disposal of mercury-containing material and ixer solutions. Maintain a training log and keep this log for at least five years. This log must be made available to your inspector.
- Properly dispose of fixer solution. Have a licensed hauler remove spent fixer solution as hazardous waste. Keep these records for at least five years and available for inspection.

in airtight containers.
Follow recycler's or hauler's instructions for disinfection of waste and separation of contact and non-contact amalgam. Do not disinfect amalgam waste using disinfectant solutions such as bleach; those containing oxidizers, peroxide or iodide; or with a pH below 6 or above 8.

A healthy dental practice will incorporate these BMPs. Following them is one more way that you can promote the health of your patients and the general public. It can be good for your bottom line, too, as many of today's consumers want to support businesses that use "green" practices.

BMPS are: Good for the environment • Good for patients • Good for business

- Maintain Amalgam Separator.

  Maintain written or computerized records of amalgam separator inspections, maintenance and repairs. When an amalgam separator is not functioning properly, it must be repaired consistent with manufacturer recommendations or replaced no more than 10 days after the malfunction is discovered.
- 6 Properly discard amalgam waste.
  Recycling is the preferred method for discarding amalgam waste. For recycling or disposal as a hazardous waste, have a licensed recycling contractor or hazardous waste hauler remove your amalgam waste, or use a mail-in-service. Maintain records of amalgam waste generated or removed from the vacuum system or plumbing. In addition, obtain documentation for all amalgam recycling and disposal. Keep these records for at least five years and available for inspection.

## Questions

#### What is amalgam waste?

Amalgam waste means and includes non-contact dental amalgam (dental amalgam scrap that has not been in contact with the patient); contact dental amalgam (including, but not limited to, extracted teeth containing amalgam); dental amalgam sludge captured by chairside traps, vacuum pump filters, screens and other dental amalgam trapping devices including the traps, filters and screens; used, leaking or unusable dental amalgam capsules; and used amalgam separator canisters.

#### Is any dental practice exempt from these amalgam waste management requirements?

A practice is exempt from this requirement if amalgam fillings are removed or placed in limited or emergency situations and the facility serves one of the following primary functions:

- Oral and maxillofacial radiology
- Oral and maxillofacial surgery
- Oral pathology
- Orthodontics
- Periodontics
- Prosthodontics
- · Mobile dental

#### Will separator installed before the permit requirements take effect be acceptable for compli-

Yes, but only if the unit is an approved ISO 11143 or ANSI/ADA 108 certified amalgam separator.

#### Will chairside traps and vacuum filters meet the requirement?

No, chairside traps and vacuum filters are separate devices that do not meet the amalgam removal requirement.

#### Will dental practices be charged permit fees like large industries?

No, there is no permit fee at this time.

#### What is the duration of my permit?

Dental Wastewater Discharge Permits are effective for a period of five (5) years. The effective and renewal dates are indicated in your permit.

#### Will my practice be inspected for compliance with my permit?

Yes, an inspection may be performed during the five-year permit period without advance notice. If your practice is out of compliance, additional inspections may be conducted.

Amalgam Araga

### **Compliance Checklist**



- Submit complete Dental Wastewater Discharge Permit Application.
- Receive Dental Wastewater Discharge Permit with effective date.
- Implement Best Management Practices.
- Submit Best Management Practices Certification Form within 90 days of permit's effective date.
- Install approved ISO 11143 or ANSI/ADA 108 certified amalgam separator.
- Submit Amalgam Separator Installation Certification within 90 days of effective date of permit.
- Keep training, disposal and equipment records on-site and available for inspection.
- Submit Dental Wastewater Discharge Permit Annual Report when required.





Serving the cities of San José, Santa Clara, and Milpitas; Cupertino Sanitary District; West Valley Sanitation District (including Campbell, Los Gatos, Monte Sereno and Saratoga); County Sanitation District No. 2-3; and Burbank Sanitary District.



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