

Dental Amalgam Control Program

Implementation & Training Presentation

Metro Water Recovery

Outline

- Amalgam Separator Installation & Maintenance
- Operations & Maintenance (O&M) Plan
- Best Management Practices (BMPs)
- Record Keeping Requirements
- Reporting Requirements and Inspections



Amalgam Separator Installation & Maintenance

Metro Water Recovery ~ Dental Amalgam Control Program
Rules & Regulations, Section 6.16.1, CFR 441.30

Amalgam Separator Installation & Maintenance

All amalgam-containing wastewater must be discharged through an amalgam separator.

- Amalgam separators must comply with ISO 11143 standards and be designed with a minimum removal of 95% solids, unless otherwise approved by Metro.
- Amalgam separators must be properly sized for the volume and flow of the dental facility's amalgam wastewater in accordance with the manufacturer's specifications and recommendations.
- Amalgam separators must be installed, operated and maintained according to the manufacturer's operating manual.
- In the event that an amalgam separator is not functioning properly, the amalgam separator must be repaired consistent with manufacturer instructions or replaced with a unit that meets the requirements of CFR 441.30 as soon as possible, but ***no later than 10 business days after the malfunction is discovered.***





Operations and Maintenance (O&M) Plan

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Rules & Regulations, Section 6.16.1, CFR 441.30

Operations and Maintenance (O&M) Plan

Each dental facility must develop an O&M Plan to ensure proper operation and maintenance of all amalgam separators and documentation of all maintenance activities. This plan must be kept current and must address, at a minimum, the following:

- Required maintenance according to the manufacturer's recommendations must be performed and documented.
- A monthly visual inspection of the amalgam separator(s) must be performed, and a monthly amalgam separator inspection log must be maintained with dates and personnel signatures.
- Collection device replacement per the manufacturer's recommendation or when solids reach the full line, whichever comes first.
- Amalgam wastes should be transferred to an off-site mercury recycling facility or managed and disposed of in accordance with applicable federal, state and local hazardous waste laws and regulations.

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Best Management Practices (BMPs)

Metro Water Recovery ~ Dental Amalgam Control Program
Rules & Regulations, Section 6.16.1, CFR 441.30

Best Management Practices (BMPs)

Best Management Practices (BMPs) are control measures required of the dental facility to prevent or control the disposal of mercury and other metals in the form of restorative amalgams.

- Use only pre-capsulated, single-use amalgam. Bulk mercury must not be used, and any remaining bulk mercury must be appropriately recycled.
- All dental chairs at which dental amalgam may be present in the resulting wastewater shall be equipped with disposable chair-side traps and all vacuum pumps shall be equipped with traps or filters. All equipment must be cleaned and maintained in accordance with the manufacturer's instructions.



- Do not rinse screens, filters, traps, amalgam separators or any other amalgam-containing equipment over sinks or drains!



Best Management Practices (BMPs)

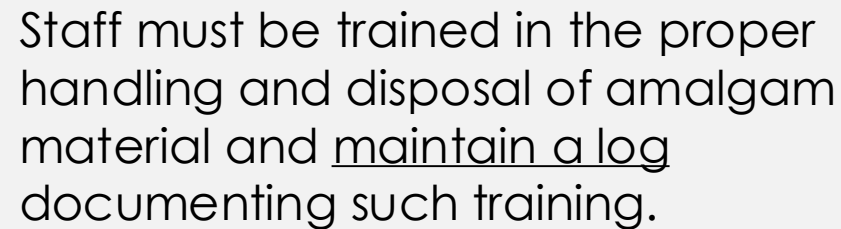
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Only use non-chlorine, non-oxidizing disinfectants and neutral cleaners, **with a pH between 6 and 8**. Chlorinated, oxidizing cleaners will cause mercury to dissolve and pass through the amalgam separator system.

Metro does not endorse any line-cleaning brands, but the products pictured are known to meet the pH 6-8 requirement. We recommend you consult with your dental supply company for an acceptable product, and that you review the Safety Data Sheet (SDS) prior to purchase to verify that it qualifies under the Regulations.



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Best Management Practices for Amalgam Waste





Record Keeping Requirements

Metro Water Recovery ~ Dental Amalgam Control Program
Rules & Regulations, Section 6.16.1, CFR 441.50

Record Keeping Requirements

Excluding the One-Time Compliance Report which must be maintained as long as the dental facility is in operation or ownership is transferred, the following documentation shall be established and maintained in either physical or electronic format for no less than three(3) years and made available for Metro review upon request.

- Documentation of all dates that collected dental amalgam is picked up or shipped for proper disposal in accordance with 40 CFR 261.5 (g)(3) including copies of receipts, manifests, and other documents that include the date(s) of the amalgam waste collection and the name of the permitted or licensed treatment storage or disposal facility receiving the amalgam retaining container.
- Documentation of any repair or replacement of an amalgam separator or equivalent device, including the date, person(s) making the repair or replacement and a description of the repair or replacement (including make and model).

The image displays two sample forms used for dental amalgam disposal documentation. The top form is a 'Certificate of Assistance' from Medentex, which includes fields for 'Facility Name', 'Address', 'City/State/Zip', and 'Phone'. It also features a 'Recycling Symbol' and a section for 'Disposal Method' with checkboxes for 'Shipped to Medentex', 'Shipped to a third party', and 'Shipped to a third party (not Medentex)'. The bottom form is a 'Certificate of Receipt' from Solmetex, which includes fields for 'Date', 'Quantity', 'Weight', 'Volume', 'Disposal Method', 'Facility Name', 'Address', 'City/State/Zip', and 'Phone'. Both forms are designed to provide a clear record of the disposal process.

Reporting Requirements & Inspections

Metro Water Recovery ~
Dental Amalgam Control Program

Rules & Regulations, Sections 6.16.1 and 6.25
CFR 441.10 & 441.50

- Compliance Reporting
- De Minimis and Exempt Facilities
- Inspections
- Right of Entry
- Non-Compliance



Reporting Requirements & Inspections

Compliance Reporting

All dental facilities ~ a One-Time Compliance Report must be submitted to Metro no later than 90 days following the commencement of discharge to Metro.

Signatory Authority ~ One-Time Compliance Reports must be signed and certified by a responsible corporate officer, a general partner or proprietor if the dental discharger is a partnership or sole proprietorship, or a duly authorized representative.

O&M Plans ~ One-Time Compliance Reports (non-exempt) must include a copy of the dental facility's O&M Plan, which must explain the practices employed by the facility to ensure proper operation and maintenance in accordance with 40 CFR 441.30 or 441.40.

De Minimus and Exempt Facilities

De Minimus facilities include those that **do not place any amalgam**, and whose removal of amalgam and teeth with amalgam comprises **less than 5%** of the dental facility's business.

Exempt facilities are those that exclusively practice one or more of the following:

- Oral Pathology
- Oral and Maxillofacial radiology
- Oral and maxillofacial surgery
- Orthodontics
- Periodontics
- Prosthodontics
- Mobile Dental facilities

Exempt dental facilities meeting the above criteria ~ a One-Time Compliance Report must be submitted to Metro no later than 90 days following the commencement of discharge to Metro.

Signatory Authority ~ One-Time Compliance Reports must be signed and certified by a responsible corporate officer, a general partner or proprietor if the dental discharger is a partnership or sole proprietorship, or a duly authorized representative.

Reporting Requirements & Inspections

(Continued)

Inspections

Metro staff will periodically perform inspections at your facility to verify compliance with Metro's Dental Amalgam Control Program.

Inspection components include:

- Amalgam separator(s) and related plumbing, as well as chair-side traps and vacuum pumps.
- Implementation of Best Management Practices (BMPs).
- Verify type of amalgam used (bulk mercury must not be used).
- Maintenance records and waste manifests.
- Monthly visual amalgam separator inspection logs
- Operations & Maintenance Plan
- Employee amalgam-handling training logs.
- The use of only non-chlorine, non-oxidizing, neutral (pH 6-8) line cleaners.
- Scrap and waste amalgam storage and recycling.
- Any other processes with discharge to the sanitary sewer.

Right of Entry

Metro may conduct inspections of the facility and examine and copy any records to be maintained by this facility to determine compliance with the conditions of our Rules & Regulations, per CFR 403.8(f)(1)(v) & Colorado State Pretreatment Regulations 63.9.E(1)(f).

Non-Compliance

Non-compliance with the conditions of Metro's Rules & Regulations may subject the facility to enforcement actions as deemed appropriate, per Metro's Enforcement Response Plan (ERP), Tables 10.1a and 10.1b. Legal authority to apply and enforce these requirements is also outlined in the Clean Water Act, Sections 307(b) and (c) and 402(b)(8) (Appendix A).



Quiz

Metro Water Recovery ~ Dental Amalgam Control Program

Quiz

(See Slides 22 - 24 for answers)

1. How often should your amalgam separator(s) be visually inspected and logged by a member of your staff?
A. Daily? B. Weekly? C. Monthly? D. Annually?
2. When should you replace your amalgam separator collection canister?
A. When my sales guy says so
B. Never
C. When solids reach the full line, or per the manufacturer's recommendation, whichever comes first.
3. In the event that your amalgam separator is not functioning properly, the amalgam separator must be repaired consistent with manufacturer instructions or replaced with a unit that meets the requirements of CFR 441.30 as soon as possible, but **no later than:**
A. 10 business days after the malfunction is discovered.
B. 1 Month after the malfunction is discovered.
C. 90 days after the malfunction is discovered.
4. It is okay to rinse screens, filters, traps, amalgam separators or any other amalgam-containing equipment over sinks or drains.
A. True B. False

Quiz

(See Slides 22 - 24 for answers)

5. Regulations now specify that line cleaners must now have a pH between:
A. 0-10 pH B. 5-9 pH C. 6-8 pH D. Anything under 12 pH
6. Contact and non-contact amalgam scrap may be disposed of using the following method:
A. With Biohazard/Red Bag waste
B. With municipal trash
C. Must be salvaged and stored in structurally sound, tightly closed, and appropriately labeled containers for recycling.
7. Staff amalgam-handling training must be:
A. Done prior to hire.
B. Conducted and logged at least once in your office for each current and future employee.
C. Is included with OSHA training, so does not apply.
8. How often will Metro be inspecting my facility to verify compliance and conduct enforcement, if necessary?
A. Annually B. Every 3 years C. Every 5 years D. It will vary, so always stay in compliance!

Quiz

(See Slides 22 - 24 for answers)

9. How long am I required to retain copies of receipts, manifests, and other documents that include the date(s) of the amalgam waste collection and the name of the permitted or licensed treatment storage or disposal facility receiving the amalgam retaining container?
- A. 1 Year B. No less than 3 years C. No less than 5 years D. For the life of my business
10. How long must I retain a copy of my One-Time Compliance Report?
- A. As long as my business is in operation or ownership is transferred
- B. No less than 3 years
- C. No less than 5 years
11. I must send a copy of my Operations & Maintenance Plan to Metro with my One-Time Compliance Report (non-exempt).
- A. True B. False



Quiz Answers

Metro Water Recovery ~ Dental Amalgam Control Program

Quiz Answers

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4. It is okay to rinse screens, filters, traps, amalgam separators or any other amalgam-containing equipment over sinks or drains.
A. True **B. False!!!**

Quiz Answers

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Quiz Answers

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- A. 1 Year **B. No less than 3 years** C. No less than 5 years D. For the life of my business
10. How long must I retain a copy of my One-Time Compliance Report?
- A. As long as my business is in operation or until ownership is transferred**
- B. No less than 3 years
- C. No less than 5 years
11. I must send a copy of my Operations & Maintenance Plan to Metro with my One-Time Compliance Report (non-exempt).
- A. True** B. False

Contact



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THANK YOU