

Dental Amalgam Best Environmental Management Practices

WHO IS REQUIRED TO PARTICIPATE?

Dentists who remove or place amalgam fillings and who practice in the Freedom or Santa Cruz County Sanitation Districts are required to submit a One Time Compliance Report by 3/31/20 and follow Best Management Practices.





ental wastewater may contain mercury, a toxin that affects the health of waterways, wildlife and people.

The Water Board and Federal Environmental Protection Agency (EPA) require wastewater treatment facilities, including the Freedom and Santa Cruz County Sanitation District (SCCSD), to implement programs that control mercury at its source.

Capturing mercury at its source before it reaches the sewer system is the best way to reduce mercury pollution in both water and air. The Dental Amal- gam Rule requires dentists to implement practices aimed at keeping dental- related mercury out of the sanitary sewer system — and ultimately out of the Monterey Bay National Marine Sanctuary.

How does a dental practice comply?

(detailed

below).

STEP 1	STEP 2	STEP 3	STEP 4	STEP 5
Submit One Time	Follow Best	Install an approved amalgam	Submit	Keep training,
Compliance	Management		documentation	disposal, and
Report.	Practices		certifying your	equipment

separator, if

you currently

don't have

one.

compliance with the

requirements (see

checklist on last

page).

records on site

and available

for inspection.

For more information, visit **WWW.SCCSD.US**

Visit our website

or call for a form.



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 (BMP's)

These practices are required as part of your One Time Compliance Certification.

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 pre-capsulated 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.
- 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 fixer solutions. Maintain a training log and keep this log for at least five years. This log must be made available to your inspector.
- 9 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.

Store amalgam waste 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.

- 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 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

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.

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 Dental Rule requirements take effect be acceptable for compliance?

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 fees?

No, there are no fees at this time.

What is the duration of my One Time Compliance Report?

The One Time Compliance Report is effective until the Dental Facility is sold or there is a transfer of ownership.

Will my practice be inspected for compliance with my One Time Compliance Report?

Yes, an inspection may be performed without advance notice to confirm compliance with the EPA Dental Rule and SCCSD Code 7.04.

Compliance Checklist



All required forms can be found on our website at WWW.SCCSD.US

- Submit completed One Time Compliance Report by March 31, 2020.
- Implement Best Management Practices.
- □ Install approved ISO 11143 or ANSI/ADA 108 certified amalgam separator by required deadlines.
- □ Keep training, disposal and equipment records on-site and available for inspection.

Contact information:

For Information about inspections and One Time Compliance Applications please contact the County of Santa Cruz Environmental Compliance Unit at 831-477-3907

For more information on Best Management Practices for Hazardous Material Storage contact the County of Santa Cruz Environmental Health Services Department at 831-454-2022