

CRANBERRY TOWNSHIP

Pre-Treatment Newsletter

September 2017

Dental Amalgam Regulation

The purpose of a newsletter is to provide specialized information to dental offices located in Cranberry Township regarding EPA's New Dental amalgam regulation.

Dental Amalgam and our Environment

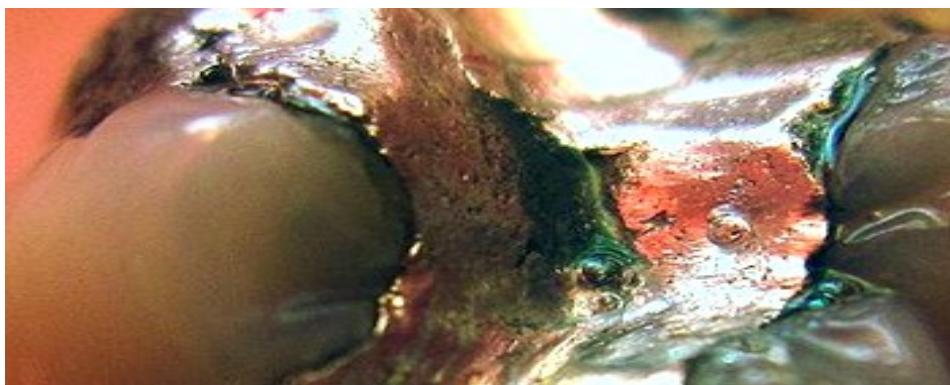
EPA estimates that across the United States 5.1 tons of mercury from waste dental amalgam are collectively discharged into Waste Water Treatment Plant's annually. The majority of mercury at WWTP's ends up in the sludge, which is the solid by product of the treatment process. Mercury from sludge can make its way into the environment through incineration, landfilling, or land application of sludge or through surface water discharge. Some of it passes through the treatment process all together and enters the neighboring water source.

Certain microorganisms can change mercury into methylmercury, a highly toxic form of mercury that accumulates in fish, shellfish, and animals that eat fish. Fish and shellfish are the main sources of methylmercury exposure to humans.

All Dental Offices Must

- Complete the survey form within thirty 15 days of receiving it.
- Submit to site inspections.
- Operate and maintain an amalgam separator that meets the ISO 11143 (2008) standards with 95% removal efficiency before July 14, 2020.
- Record keeping requirements including ISO certification document, operators manual and cleaning and maintenance logs.
- Maintain two BMPs recommend by the ADA

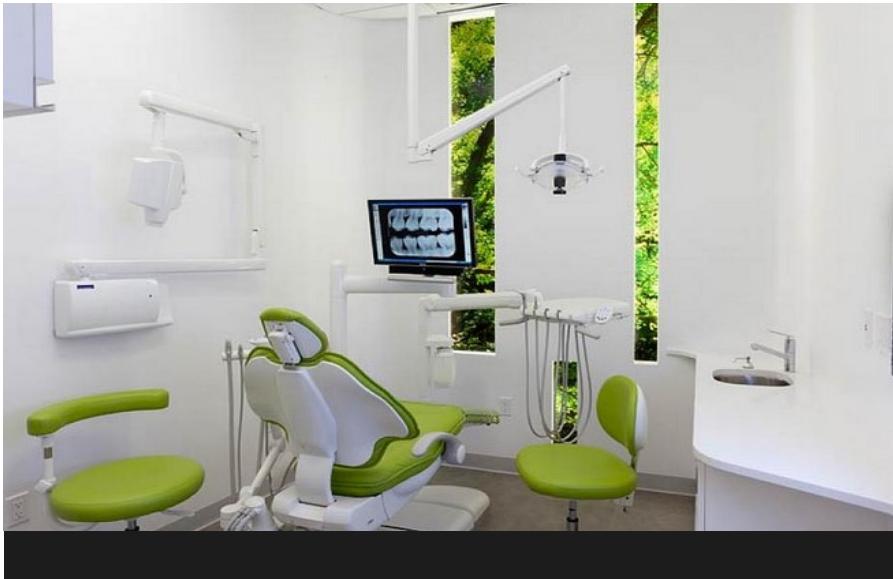
Mercury exposure in humans has been linked to cognitive decline, mood swings, declined proprioception, muscle weakness, impairment of speech, hearing, and walking



Dental Amalgam

In This Issue

- Regulation Alert
- Definitions
- Requirements
- BMPs
- Contact Information



What about specialty practices?

EPA is not proposing to include wastewater discharges from offices that do not engage in the practice of restorations or removals. The offices that exclusively consist of one or more of the following dental specialties: oral pathology, oral and maxillofacial radiology, oral and maxillofacial surgery, orthodontics, periodontics, or prosthodontics. **Please note: These offices still must complete the Survey and apply for an exemption.**

Confirm your in compliance

- Consult with your amalgam separator supplier to make sure you are one of the following
 - * American National Standards Institute (ANSI) American National Standard/American Dental Association (ADA) Specification 108 for Amalgam Separators (2009) with Technical Addendum (2011)
 - * International Organization for Standard (ISO) 11143 Standard (2008)
 - * Achieves at least 95% removal efficiency

Dental offices Must

- After the review of the Township dental dischargers will have 90 days to comply with standards including:
 - * Amalgam separator installation
 - * Provide copy of operation and maintenance manual to township
 - * (ISO) 11143 standard 2008 certification to township
 - * Maintenance logs on-site
- Submit to annual inspections to verify that amalgam separator is in use



Exempt Dental offices

- If your dental office does not install amalgam fillings and removes them at a frequency less than 5% of its procedures or on average of 9 removals/year you may apply for an exemption.
- Exemption forms will need to be completed yearly to qualify for the exemption.

Amalgam Separators

An amalgam separator is a device designed to remove solids from dental office wastewater. The amalgam separator is placed at some point in the vacuum line, before the vacuum line intersects with plumbing in other parts of the building.

Most amalgam separators are compatible with both wet and dry vacuum systems, and with both large and small dental offices.

***If you already have a separator, please note

EPA does not want to penalize existing dental offices or facilities that have already installed amalgam separators. As long as they continue to properly operate and maintain existing separators, comply with BMPs, and recordkeeping requirements, these facilities will be considered in compliance until ten years from the effective date of the final rule.



Best Management Practices

In addition to installing an amalgam separator with a 95% removal efficiency by July 14, 2020 dental offices that are permitted as DIUs will need to meet the following BMPs.

EPA also requires the following Best Management Practices to control mercury that would not be captured by an amalgam separator.

- Line cleaner must be of a neutral pH no less than 6 or greater than 8. Bleach, chlorine, iodine and peroxide cleaners can solubilize bound mercury and are therefore prohibited.
- Prohibit the flushing of scrap dental amalgam into any drain that is not connected to an amalgam separator. Flushing of scrap amalgam presents additional opportunities for mercury to be discharged from the dental office.
- Provide for proper operation and maintenance of the amalgam separator. According to the manufacturer's instruction manual inspect, clean, and document separator O & M activities.
- Follow Federal, State, and Local Disposal regulations. Be able to provide documentation demonstrating that all residual wastes have been disposed of in accordance to all Federal, State and Local Laws.

Questions

Q: Will the new regulation apply to my office

A: Existing offices and new offices must comply if they place or remove amalgam.

Q: Will the new regulation require that I obtain a permit from Cranberry Township?

A: Depends, you will either be issued a permit or have to sign a waiver.

Q: What will Cranberry Township charge if my practice is permitted?

A: An annual fee of \$250 dollars will be charged to the dental discharger. It will come out in equal installments on your sewer and water bill.

Q: What is required of me if I have an existing amalgam separator

A: You can continue to use that separator until 7/14/2027 or until the end of the devices life, whichever is sooner.

Q: How often should I have my separator cleaned?

A: The frequency of cleaning will be stated in your manufacturing operating manual.

Q: If my amalgam separator malfunctions how long do I have to repair it.

A: Ten days from the time of the malfunction.



New Dental Amalgam Regulation Summary

The US Environmental Protection Agency has officially declared the dental amalgam ruling effective as of July 14, 2017. All existing dental offices must comply with the rule by July 14th, 2020. All new dental offices are subject to the rule at the time of opening. Currently, Cranberry Township's Industrial Pretreatment program is not mandated, however, the program was effected through ordinance 2006-373 in 2006 and has been structured as if it were mandated. The pretreatment program will become mandated after the Brush Creek Wastewater Plant renovations are finished. EPA will be responsible for regulating areas which are not in an approved pretreatment program, so your office may also be contacted by US EPA. By Federal and Local law you must comply with both the US EPA and Cranberry Township requirements.

For More Information:

<http://water.epa.gov/scitech/wastetech/guide/dental/>

<https://www.federalregister.gov/documents/2017/06/14/2017-12338/effluent->

Contact Us

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