

# New Dental Dischargers and the Dental Office Category Rule

This packet was prepared by the Trinity River Authority (TRA) and the **Town of Westlake** to help new dental offices understand the Dental Office Category Rule published by the Environmental Protection Agency (EPA) on June 14, 2017. The TRA operates the local regional wastewater treatment plant and the **Town of Westlake** is a Contracting Party of the TRA. The TRA is the Control Authority for offices that receive this packet.

## THE EPA DENTAL OFFICE CATEGORY RULE

The Dental Office Category Rule took effect on July 14, 2017. New dental offices and offices that are transferring ownership must immediately comply with this rule and submit a One-Time Compliance Report within 90 days following the introduction of wastewater to the sanitary sewer. This packet provides a summary of the Rule, provides guidance for coming into compliance with the Rule, and offers a short checklist for new dental offices. This packet also demonstrates the American Dental Association's (ADA) support for the removal and recycling of dental amalgam that contains mercury from the wastewater discharged to the sanitary sewer. Also detailed within this packet are two Best Management Practices (BMPs) that are outlined in the final Dental Office Category Rule and also supported by the ADA.

Please complete the included One-Time Compliance Report and return the report per the instructions on the form.

For more information on the Dental Office Category Rule, please visit:

<https://www.epa.gov/eg/dental-effluent-guidelines>



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## SUMMARY OF THE DENTAL OFFICE CATEGORY RULE

<p><b>What is the Dental Rule?<sup>1</sup></b></p>	<ul style="list-style-type: none"> <li>• Requires dental offices that discharge wastewater that contains dental amalgam to the sanitary sewer to install, inspect, and maintain a dental amalgam separator.</li> <li>• Requires the implementation of two Best Management Practices (BMPs).</li> <li>• Published in Federal Register by EPA on June 14, 2017.</li> <li>• EPA estimates the average annual cost incurred by dental offices at \$800 annually.</li> </ul>		
<p><b>Why are standards needed?<sup>1</sup></b></p>	<ul style="list-style-type: none"> <li>• Mercury from waste amalgam can end up in the environment from a Publicly Owned Treatment Works (POTW) through incineration, landfilling, or land application.</li> <li>• Mercury – potent neurotoxin that causes wide range of health issues.</li> </ul>		
<p><b>Who is affected by the Dental Rule?<sup>1</sup></b></p>	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>Applies to:</p> <ul style="list-style-type: none"> <li>• Dental offices</li> <li>• Dental schools</li> <li>• Dental clinics</li> <li>• Government operated dental facilities</li> </ul> </td> <td style="width: 50%; vertical-align: top;"> <p>Does NOT apply to:</p> <ul style="list-style-type: none"> <li>• Mobile units</li> <li>• Practices consisting ONLY of these specialties: oral pathology, oral &amp; maxillofacial radiology/surgery, orthodontics, periodontics, or prosthodontics.</li> </ul> </td> </tr> </table>	<p>Applies to:</p> <ul style="list-style-type: none"> <li>• Dental offices</li> <li>• Dental schools</li> <li>• Dental clinics</li> <li>• Government operated dental facilities</li> </ul>	<p>Does NOT apply to:</p> <ul style="list-style-type: none"> <li>• Mobile units</li> <li>• Practices consisting ONLY of these specialties: oral pathology, oral &amp; maxillofacial radiology/surgery, orthodontics, periodontics, or prosthodontics.</li> </ul>
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<p><b>What kind of amalgam separator is required?<sup>2</sup></b></p>	<ul style="list-style-type: none"> <li>• Amalgam separator(s) compliant with ISO11143 (2008); ANSI/ADA 108-2009; or,</li> <li>• Amalgam separator(s) or amalgam removal device(s) capable of at least 95% amalgam removal efficiency. The removal efficiency of the device must be determined using the procedures found in <a href="#">40CFR §441.30(a)(2)(i)-(ii)</a>.</li> </ul>		
<p><b>When will this rule affect dental offices?<sup>2</sup></b></p>	<p>This rule took effect July 14, 2017.</p> <p>NEW dental offices:</p> <ul style="list-style-type: none"> <li>• MUST return the One-Time Compliance Report within 90 days following the introduction of wastewater to the sanitary sewer.</li> </ul> <p>TRANSFER OF OWNERSHIP:</p> <ul style="list-style-type: none"> <li>• MUST return the One-Time Compliance Report within 90 days after a transfer of ownership.</li> </ul>		
<p><b>What steps are needed to be taken to come into compliance?</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Install new amalgam separator(s) or amalgam removal device(s) in offices that do not currently have one.</li> <li><input type="checkbox"/> Inspect existing models to make sure they are up to standard.</li> <li><input type="checkbox"/> Establish internal documentation tracking procedures related to the inspection and maintenance of your amalgam separator(s) or amalgam removal device(s).</li> <li><input type="checkbox"/> Follow the ADA's Best Management Practices for handling dental amalgam.</li> <li><input type="checkbox"/> Complete the One-Time Compliance Report for Dental Discharges and return the report per the instructions on the form. Retain a copy of this report on site for the duration of your practice/ownership.</li> </ul>		

# The American Dental Association (ADA)

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## Amalgam Waste Best Management Practices<sup>3</sup>

These Best Management Practices for Amalgam Waste encourages the dental community to follow the BMP for proper waste handling and disposal. The BMP by the American Dental Association calls for the use of ISO 11143-compliant amalgam separator as a recommendation. The ADA's BMP on Amalgam Waste follows the procedures outlined in the EPA's final rule on amalgam separators.

### Do:

- Use pre-capsulated alloys & stock capsule size variety
- Recycle used disposable amalgam capsules
- Salvage, store, & recycle non-contact amalgam
- Salvage contact amalgam pieces from restorations after removal & recycle contents
- Recycle teeth containing dental amalgam restorations & verify whether or not teeth need disinfection
- Manage amalgam waste through recycling as much as possible
- Use line cleaners that minimize dissolution of amalgam

### Don't:

- Use bulk mercury
- Put used disposable amalgam capsules in biohazard containers
- Put non-contact amalgam waste in biohazard containers, infectious waste containers, or regular garbage
- Rinse devices containing amalgam over drains or sinks
- Dispose of extracted teeth that contain amalgam restorations in biohazard containers, infectious waste containers, sharps containers, or regular garbage
- Flush amalgam down the drain/toilet
- Use bleach or chlorine-containing cleaners to flush wastewater lines

## Resources

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1. U.S. Environmental Protection Agency. [Fact Sheet: Effluent Limitations Guidelines and Standards for Dental Offices](#). Accessed June 29, 2017.
  2. U.S. Environmental Protection Agency. [Effluent Limitations Guidelines and Standards for the Dental Category](#). Accessed June 29, 2017.
  3. American Dental Association. [Amalgam Separators and Waste Best Management](#). Accessed June 29, 2017.
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