


Dental Amalgam Separators: Are Best Management Practices Enough?


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The MOU

- ◆ Commits the three organizations to work together to decrease mercury discharges
 - ◆ Improves handling of dental amalgam where local programs have not already been developed
 - ◆ Encourages dental clinics to follow the ADA's Best Management Practices
 - ◆ Does not affect local clean water agency authority
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The MOU

- ◆ Currently in the “goal-setting” phase
 - ◆ Establishing meaningful performance goals
 - ◆ Real but realistic goals
 - ◆ Demonstrable progress toward meeting the goals of the MOU
 - ◆ Collection of baseline information
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Collection of Baseline Data

- ◆ Survey??
- ◆ Need to know
 - Who has programs in place
 - What compliance levels are
 - Types of problems being experienced
- ◆ Aid in goal-setting process

Michigan Act No. 503

- ◆ Passed January 12, 2009
- ◆ 90 days to promulgate rules
(Department of Community Health)
- ◆ Install dental amalgam separators in
dental facilities by December 31,
2013
- ◆ 95% or greater efficiency (ISO
11143:2008)


Michigan Act No. 503

- ◆ “Preempts and supersedes any local ordinance, regulation, or resolution that imposes conflicting, different, or additional standards or requirements on dentists than those contained in this section or rules promulgated by the board under this section”

Michigan Act No. 503

- ◆ “A local unit of government...including but not limited to, the requirement to obtain a permit that limits the discharge of mercury into wastewater with a limitation greater than that capable of being achieved by full compliance with this section.”

Michigan Act No. 503

- ◆ So what does this all mean?
 - ◆ Communities may have to decide to violate either this statute or the Federal Clean Water Act and the Michigan Natural Resources and Environmental Protection Act
 - ◆ Act may impede mercury reduction efforts already in place
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Michigan Act No. 503

- ◆ Removes a local government's legal authority to enforce the industrial pretreatment requirements mandated by Federal law
- ◆ The mercury workgroup is watching this progress very closely

Other mercury workgroup news...

- ◆ Workgroup conference call
- ◆ Updates to mailing list
- ◆ Survey
- ◆ Looking for membrane filtration plants with Method 1631 data