

Dental Effluent Guideline Update

NACWA National Pretreatment and Pollution
Prevention Workshop

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**September 27, 2010 Press
Release:**

**EPA Will Propose Rule to
Protect Waterways by Reducing
Mercury from Dental Offices**



40 CFR 441 Rule Schedule

- Proposal - October 2011
- Final rule - October 2012

10 States have mandatory program requirements

- Connecticut, Maine, Massachusetts, Michigan, New Hampshire, New Jersey, New York, Oregon, Rhode Island and Vermont

What we've done...

- Met with external stakeholder groups
- Created an EPA dental amalgam workgroup
- Held three “listening sessions”

External Stakeholder Group Meetings

- Various stakeholder groups have identified factors EPA may wish to evaluate with respect to its consideration of amalgam separators. Further, they have identified additional BMPs and/or scoping considerations.

Major Issues From External Stakeholders

- 1. Standard for amalgam separators
 - ANSI, ISO?
 - New standard?
- 2. Dentists with existing amalgam separators
 - Should previously installed models be accommodated? If so, how?

Issues (Cont'd)

- 3. Operation and maintenance of amalgam separators
Should EPA establish specific operation and maintenance requirements?
- 4. Demonstrating Compliance
 - Certification
 - Other ?

Issues (cont'd)

➤ 5. Discouraging Separator Use

- Dentists will be reluctant to install separators now as they are unsure of EPA's requirements

Current pretreatment regulations define dischargers subject to categorical pretreatment standards to be significant industrial users (SIUs).

Establishing pretreatment standards would create over 100,000 new SIUs.

Should EPA consider alternatives? If so, what alternatives?

Comments from listening sessions

- POTWs document >50% reduction in Hg
- POTW and State using annual certifications for means of compliance with requirements
- POTWs often inspect dentists from once per year to once per five years
- POTW inspection rates were greater with limited number of dental offices

Comments (cont'd)

- Several POTWs noted inspections identified improper management of solids containers
- Large program managing over 5,000 dentists using electronic reporting
- Several state and local programs noted that the existing requirements in Part 403 for annual inspections and permitting may be burdensome for control authorities.

WE
GET
IT!

?’s and COMMENTS