



FREDERICK COUNTY GOVERNMENT

Jan H. Gardner
County Executive

DIVISION OF UTILITIES & SOLID WASTE MANAGEMENT

Department of Regulatory Compliance

Kevin L. Demosky, Director
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August 7, 2017

Subject: The Dental Rule – Managing Mercury present in Amalgam

On June 14, 2017, the US Environmental Protection Agency (USEPA) published a final rule in the Federal Register (82 FR 27154) to reduce discharges of mercury from dental offices to municipal sewage treatment plants (POTW's). The rule requires dental offices to use amalgam separators and two best management practices recommended by the American Dental Association (ADA). The effective date of this USEPA rule was July 14, 2017.

The new rule applies to dentists **except** those that:

- exclusively practice one or more of the following dental specialties: oral pathology, oral and maxillofacial radiology, oral and maxillofacial surgery, orthodontics, periodontics, or prosthodontics.
- discharge from a mobile unit operated by a dental discharger.
- do not discharge any amalgam process wastewater to a POTW, such as dental dischargers that collect all dental amalgam process wastewater for transfer to a Centralized Waste Treatment facility as defined in 40 CFR Part 437.
- do not place dental amalgam, and do not remove amalgam except in limited emergency or unplanned, unanticipated circumstances and that certify such to the local regulatory agency, in this case, Frederick County's Division of Utilities and Solid Waste Management (DUSWM).

For dental practices not excepted by the above conditions, an amalgam separator or similar device must be operational by July 14, 2020. Practices must also prohibit discharge of scrap amalgam and prohibit use of line cleaners that may lead to dissolution of solid mercury when cleaning chair-side traps and vacuum lines.

The new rule requires submission of a one-time compliance report which can be found on the Frederick County website at <https://www.frederickcountymd.gov/7455/Dental-Rule>. In general, each dental office must provide basic identification information and several statements attesting to the manner in which they are regulated. Additionally, equipment maintenance records and waste disposal information must be maintained and available for inspection. Other conditions apply for those dental practices that have already implemented various forms of amalgam capture.

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www.FrederickCountyMD.gov

For further information and specific guidance on this USEPA rule, visit the following links:

For the original Federal Register notice

<https://www.gpo.gov/fdsys/pkg/FR-2017-06-14/pdf/2017-12338.pdf>

For additional information and a short fact sheet prepared by USEPA

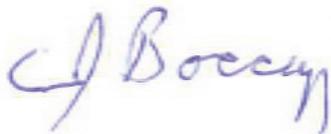
<https://www.epa.gov/eg/dental-effluent-guidelines>

The enforcement of this rule will be implemented by DUSWM's Department of Regulatory Compliance - Pretreatment. The one-time compliance report should be directed to my attention by the due date associated with your specific circumstances (see attached Instruction sheet) at:

Frederick County Division of Utilities and Solid Waste Management
Department of Regulatory Compliance
4520 Metropolitan Court
Frederick, MD 21704

For additional information on the Frederick County level, contact me at jboccuzzi@FrederickCountyMD.gov or 301-600-2511.

Very truly yours,



Jack Boccuzzi
Pretreatment Specialist