

THE NEXT SHUTDOWN IS CLOSER THAN YOU THINK...

and it has nothing to do with COVID-19

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EPA “Dental Rule” 40 CFR Part 441

Effluent Limitations Guidelines and Standards for the Dental Category 40 CFR Part 441

Effective July 14, 2020 all non-exempt existing dental practices were required to install either an ISO 11143:2008 certified amalgam separator or a certified ANSI/ADA Standard No. 108 amalgam separator, both at a removal rate of 95%.

Some offices are exempt.

Source: <https://www.ecfr.gov/cgi-bin/text-idx?SID=8cd479a3a836f1837caa08f7630d8698&mc=true&node=pt40.32.441&rgn=div5>

The Why for the EPA Rule: Part I

- Dental amalgam is made up of two nearly equal parts
 - ✓ 50% powder containing silver, tin, copper, zinc and other metals
 - ✓ 50% liquid mercury
- Widely recognized as safe in its solid state when used properly as a dental restorative material
- Used for over 125 years
- Risk occurs on removal and placement

The Rule does not apply to:

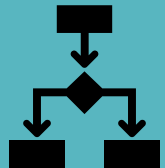
- Oral Pathologists
- Oral and Maxillofacial Radiologists
- Oral and Maxillofacial Surgeons
- Orthodontists
- Periodontists
- Prosthodontists*
- Mobile Units*
- Septic systems*

An aerial photograph of ocean waves, showing white foam and deep blue-green water. A semi-transparent rectangular box is overlaid on the right side of the image, containing the text 'Am I exempt?'.

Am I exempt?

I already have an amalgam separator. Am I in compliance?

Simply installing an amalgam separator isn't enough!
4 Components of Compliance



1. Install an amalgam separator

Submit a *One-Time Compliance Report*

Existing offices- no later than 10/12/2020 or within 90 days after transfer of ownership

New offices (after 7/14/2017)- submit within 90 days following the introduction of wastewater in a municipal source

Grandfathered offices



2. Obtain an approved amalgam bucket

Must be labeled “Non-contact Amalgam Waste for Recycling”



3. Use vacuum line cleaner

Must have a neutral pH
(between 6 and 8)



4. Retain all documentation, including recycling, repairs and Certificates of Compliance and your *OTCR*

All records organized, maintained and ready for inspection
Electronic copies are acceptable

A high-speed photograph of a water droplet just before it impacts a dark surface. The droplet is a perfect sphere, reflecting light, and is surrounded by several concentric, glowing white ripples that expand outwards from the point of impact. The background is a dark, textured blue.

COMPLIANCE SUMMARY

1. Install an amalgam separator **and** file your *One-Time Compliance Report*
2. Get an amalgam bucket
3. Get and use a neutral pH vacuum line cleaner
4. Get and keep your records in order

Resources

- ✓ https://solmetex.com/epa_regulation/
- ✓ <https://solmetex.com/compliance-reports>
- ✓ www.epa.gov/eg/dental-effluent-guidelines
- ✓ https://www.epa.gov/sites/production/files/2017-12/documents/dental-office-category_frequent-questions_nov-2017.pdf
- ✓ <https://www.federalregister.gov/documents/2017/06/14/2017-12338/effluent-limitations-guidelines-and-standards-for-the-dental-category>
- ✓ <https://www.ecfr.gov/cgi-bin/text-idx?SID=8cd479a3a836f1837caa08f7630d8698&mc=true&node=pt40.32.441&rgn=div5>
- ✓ https://www.epa.gov/sites/production/files/2016-12/documents/dental-elg_final_fact-sheet_12-2016.pdf
- ✓ http://www.ada.org/~media/ADA/Member%20Center/Ffiles/topics_amalgamwaste_brochure.ashx



Questions?

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