

Pretreatment Requirements for Dental Offices



On June 14, 2017 EPA established new pretreatment regulations to reduce the discharge of mercury into municipal sewage treatment plants – aka POTWs, (Publicly Owned Treatment Works).

These regulations enacted under 40 CFR §441, commonly referred to as the “Dental Amalgam Rule”, sets standards and best management practices for certain dental practices that place or remove dental amalgam and discharge their process wastewater to the public sewer.

Existing practices, at that time, had until July 14, 2020 to comply with this Rule. New offices, those commencing discharge after July 14, 2017 or where transfer of ownership has since occurred, now must comply with these requirements immediately upon start-up and certify their compliance in writing in a “one-time” submission to the Authority. (a Dental Amalgam Compliance/Survey Form is available for this purpose at HTMA’s website – please click on the “Forms” tab).

This “Rule” establishes a performance standard for dental amalgam process wastewater based on the use of amalgam separator technology with a minimum 95% removal efficiency. It also requires dental dischargers to adopt two best management practices (BMPs): prohibition of the discharge of amalgam scrap waste to the sewer, and prohibition on the use of drain line cleaners with a pH <6 or >8, which could dissolve mercury deposits that may accumulate in chair-side traps and vacuum lines. The American Dental Association (ADA) supports these practices.

Because (HTMA) has an EPA mandated Pretreatment Program, we are tasked as the Control Authority to verify compliance with these requirements by all affected dental offices discharging to the HTMA treatment plant. This includes offices that may not be direct sewer customers of HTMA, but whose wastewater ultimately flows there for disposal. As such, our Pretreatment Program administrators and inspectors may contact you to verify compliance in this regard.

For more information about the “Dental Amalgam Rule” please visit EPA’s web-link below for detail summaries and FAQs, or contact HTMA’s Pretreatment Coordinator with any questions you may have.

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