

Effective July 14th, 2017, the EPA amalgam recycling rule has taken affect. Since that time, AzDA has been receiving numerous phone calls from the office and the teams, asking for help!

"Do I really need to have an amalgam separator?"

"But I already have an amalgam separator; do I have to buy a new one?"

"Can I be exempt from installing an amalgam separator?"

"What if I am building/remodeling my office do I have to put one in?"

"AND...What in the heck is a Compliance Report and where do I get my hands on one?"

All very pertinent questions, so let's break this down.

**1. Do I really need an Amalgam Separator? *There are exempt practitioners and non-exempt practitioners.***

**A. Exempt practitioners would be:**

- Dentists who practice in oral pathology, oral and maxillofacial radiology, oral and maxillofacial surgery, orthodontics, periodontics, and prosthodontics are exempt from this regulation.
- Dentists who do not place amalgam and only remove amalgam in unplanned or emergency situations (estimated at less than 5 percent of removals) are also exempt, but still need to fill out a one-time Compliance Report to certify the exemption.
- Mobile dental units are exempt
- Dentists who already have separators are grandfathered for 10 years until they must upgrade to an ISO 11143 certified Must file a One-Time Compliance Report by October 12, 2020 or 90 days after transfer of ownership.

**B. *Non-exempt practitioners would be:*** Any dentist's who place or removes amalgam as part of your practice.

**2. What if I already have an amalgam separator?** Dentists who already have amalgam separators are grandfathered for 10 years until they must upgrade to an ISO 11143 certified Unit. You must file a One-Time Compliance Report by October 12, 2020 or 90 days after transfer of ownership.

**3. What is I am building or Remodeling my office, do I still have to put in a separator?**

All non-exempt practitioners must install a compliant separator by July 14, 2020. All newly opened offices that begin operating on or after July 14, 2017 must be in compliance immediately. You also must file a One-Time Compliance Report within 90 days of installation.

**4. What is a Compliance Report and where do I get one / who do I send it to?**

This is by far the most asked question and it is because the EPA has not done a good job forwarding this information to the dental community.

A Compliance Report must be filled out regardless of your amalgam status within your practice! *(No separator, new office, already have a separator, or exempt from installing)* every office must fill out a Compliance Report.

Compliance Reports come from your local water authority. Most major cities or towns have a "Pretreatment Program". It is this Pretreatment Program that will issue you your Compliance Report and who you will need to return your completed document too. Click on the link below to see the list of cities and towns with Pretreatment Approved Programs.

**[Click Here for your List of Pretreatment Cities and Town](#)**

The Issue comes into play when there is NO Pretreatment Program in your area. You would then call your local water authority and ask them for a "Amalgam Separator Compliance Report". In the event they do not know what you are talking about or are unable to help you. Please contact the AZ State EPA Office.

**Arizona Department of Environmental Quality**

**Arizona Pretreatment Coordinator - Galileo Gutierrez**

**Email: [grg@azdeq.gov](mailto:grg@azdeq.gov)**

**Direct Phone Number: (602) 771-3958**

**Website: [www.azdeq.gov](http://www.azdeq.gov)**

In my first email that I sent about the Amalgam Ruling, I neglected to give you the two companies that sell Amalgam Separators so you can refer a member if asked.

The first company is *Professional Dental Services* out of Peoria AZ. If you are asked, please give the office's this contact information first. My reason is that we will make more money from Professional Dental then we would from HealthFirst. (Both are Endorsed, but we have a better Royalty arrangement with PDS)

In addition, doctors like to keep it "Close to Home" whenever possible and PDS is a local – Arizona company. Professional Dental Services also Services What They Sell! Another huge plus in the offices eyes.

**Professional Dental Services**

24542 N 76th Dr

Peoria AZ 85383

P: 623-285-6947

W: [www.pdsaz.net](http://www.pdsaz.net)

The Second company is:

**HealthFirst**

W: <https://www.healthfirst.com/ada/>

P: 888-963-6787

Either way the member will be saving \$\$.

Thank you very much for your help on this and please remember you can always transfer the call to me, I will gladly help them out.

# EPA Amalgam Recycling Rule



## NO SEPARATOR OR NEW OFFICE? MUST INSTALL

All non-exempt practitioners must install a compliant separator by July 14, 2020. Newly opened offices that begin operating on or after July 14, 2017 must be in compliance immediately.

Must file a One-Time Compliance Report within 90 days of installation.



## SEPARATOR ALREADY INSTALLED?

Good until June 14, 2027 or unit needs to be replaced, whichever comes first.

Must file a One-Time Compliance Report by October 12, 2020 or 90 days after transfer of ownership.



## EXEMPT FROM INSTALLING

1) Dentists exclusively practicing in one of these specialties: oral pathology; oral + maxillofacial radiology; oral + maxillofacial surgery; orthodontics; periodontics; prosthodontics.

No further action required.

2) Wastewater discharges from a mobile dental unit or into a private septic system.

No further action required.

3) Dentists who do not place amalgam and do not remove amalgam except in limited emergency or unplanned, unanticipated circumstances, and who certify as such (estimated less than 5%).

Must file a One-Time Compliance Report by October 12, 2020 or 90 days after transfer of ownership. Keep on record for lifetime of practice ownership.

### Installed amalgam separators must comply with the following best management practices:

1. File a One-Time Compliance Report. Keep on record for lifetime of ownership.
2. Monitor according to manufacturer's recommendation.
3. Replace/Repair if malfunctioning according to manufacturer's instructions within 10 business days of discovering defect.
4. Maintain by replacing amalgam retaining cartridge, separator canister or units as directed by manufacture or annually, whichever comes first.
5. No use of oxidizing, acidic cleaners when flushing dental unit water lines, chair-side traps and vacuum lines. Therefore no bleach, chlorine, iodine and peroxide cleaning agents that have a pH of lower than 6 or greater than 8.

### Must maintain records on site for 3 years of:

1. Any reports filed
2. A visual inspection log
3. Documentation of any repair or replacement
4. Disposal records
5. Manufacturer's current operating manual for the device in place