November 1, 2018

RE: New Dental Amalgam Standard

Dear Customer,

As you may already know, the United States Environmental Protection Agency (USEPA) published a new rule, the Dental Amalgam Standard (40 CFR 441), on June 14, 2017. This rule, which became effective on July 14, 2017, requires dental offices that place and/or remove amalgam to install and maintain amalgam separators or equivalent devices, implement American Dental Association Best Management Practices (BMP’s) and keep adequate records. All dental offices, except for mobile units and those practicing a few exempted specialties (oral pathology, oral and maxillofacial radiology/surgery, orthodontics, periodontics, and prosthodontics), are required to submit a One-Time Compliance Report. The Butler County Water and Sewer Department (BCWS) has been notified by the Ohio Environmental Protection Agency (OEPA) that BCWS’ Approved Pretreatment Program will be responsible for enforcing the Dental Amalgam Standard for all dental offices that discharge to BCWS’ sanitary sewer system.

With assistance from the Ohio State Dental Board and the American Dental Association (ADA), as well as searches on Google, Yelp and the Yellow Pages, BCWS has worked diligently to compile an accurate list of current dental offices in our services area. While all efforts were made to compile an accurate list, we realize updates may be needed. We ask that you notify us of any discrepancies or changes so that we can update our records and database.

BCWS has also put together a packet of information and forms to assist you in attaining compliance with this new rule. This packet contains an OEPA Fact Sheet outlining the implementation of the Dental Amalgam Standard, forms for the Initial Certification and One-Time Compliance Reports that must be submitted to BCWS for each dental office location in our Sewer Service Area, OEPA Amalgam Rule Flow Chart, and other OEPA guidance material. After reviewing this information, you should be ready to take the following steps:

1. Complete the Dental Discharge Initial Certification Form and submit it to BCWS no later than 1/31/2019 (Applies to all dental offices regardless of practice). This form will provide BCWS with updated contact information and identify which requirements of the rule apply to your practice at the dental office location.
2. Complete the requirements and One-Time Compliance Report which are applicable to your practice at the dental office location. For dental dischargers who do not place and/or remove amalgam except in limited emergency or unplanned, unanticipated circumstances, the One-Time Compliance Report must be submitted to BCWS no later than October 12, 2020 (If discharge began on or before July 14, 2017 – Existing Source) (Within 90 days of starting discharge if discharge began after July 14, 2017 – New Source) (Within 90 days of transferring ownership, if applicable). For dental dischargers who place and/or remove amalgam, at least one amalgam separator or equivalent device must be installed and operational and specified BMPs and record keeping must be implemented by July 14, 2020. The One-Time Compliance Report must be submitted to BCWS no later than October 12, 2020 (If discharge began on or before July 14, 2017) (Within 90 days of starting discharge if discharge began after July 14, 2017) (Within 90 days of transferring ownership, if applicable). Also see other requirements outlined on the enclosed OEPA Amalgam Rule Flow Chart.

*Please Note: As outlined above, there are two (2) separate One Time Compliance Reports within this packet. One is for Dental Dischargers with Amalgam Process Wastewater and one is for Dental Dischargers without Amalgam Process Wastewater. You only need to complete and submit the One Time Compliance Report that is applicable to your office.

As required, BCWS will maintain all submitted reports. Upon receipt of a One-Time Compliance Report for Dental Dischargers with Amalgam Process Wastewater, BCWS may arrange a one-time visit to your dental office to confirm the operation of an amalgam separator or equivalent device and ensure adequate maintenance and record keeping. Although BCWS is not required to monitor dental discharges for Mercury, we are required by our National Pollutant Discharge Elimination System (NPDES) Permit to systematically sample our sanitary sewer system for pollutants of concern. Should we identify high concentrations of Mercury in the BCWS sanitary sewer system near your office, we may request a visit to discuss how we might work together to eliminate or reduce Mercury in discharges to the sanitary sewer moving forward.

For more information about the new Dental Amalgam Standard, visit OEPA's webpage for Dental Effluent at [https://www.epa.ohio.gov/dsw/pretreatment/index#170115162-dental-effluent](https://www.epa.ohio.gov/dsw/pretreatment/index#170115162-dental-effluent) or BCWS' Dental Website at [http://des.butlercountyohio.org/content/txtcontent/DentalAmalgam.cfm](http://des.butlercountyohio.org/content/txtcontent/DentalAmalgam.cfm). Should you have any further questions regarding the new Dental Amalgam Standard, feel free to contact me at (513) 887-5573 or by email at mark.smith@bcnht.us.

Sincerely,

**BUTLER COUNTY WATER AND SEWER DEPARTMENT**

*Mark C. Smith*

Mark C. Smith  
Industrial Services Manager

Enclosures: Dental Amalgam Packet

cc: Martha Shelby, P.E., Director, BCWS  
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