



October 5, 2017

Delivery Date: _____

Dear Sir or Madam,

On June 14, 2017, the USEPA promulgated pretreatment standards (40 CFR 441) to reduce discharges of mercury from dental offices into municipal sewage treatment plants known as Publicly Owned Treatment Works (POTWs). The final rule requires dental offices to use amalgam separators and two Best Management Practices (BMPs) recommended by the American Dental Association (ADA). As the local Control Authority, City of Lebanon Authority (CoLA) is required to implement and enforce the regulation.

A summary of the regulation follows

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1. The regulation is applicable to all dental dischargers that remove or replace amalgam. It does not apply to dental dischargers 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. Also excluded are mobile units and those practices that only remove or place amalgam in limited emergency or unplanned circumstances. There is a certification required stating you are exempt.
2. All amalgam process wastewater must be treated prior to discharge to the POTW utilizing an amalgam separator meeting specific performance standards outlined in the regulation. Existing separators installed prior to June 14, 2017 meet this requirement until the separator is replaced or until June 14, 2027, whichever is sooner.
3. Waste amalgam including, but not limited to, dental amalgam from chair-side traps, screens, vacuum pump filters, dental tools, cuspidors, or collection devices, must not be discharged to a POTW.
4. Dental unit water lines, chair-side traps, and vacuum lines that discharge amalgam process wastewater to a POTW must not be cleaned with oxidizing or acidic cleaners, including but not limited to, bleach, chlorine, iodine and peroxide that have a pH lower than 6 or greater than 8.
5. Recordkeeping requirements include documentation of inspection, maintenance and repair of the separator as well as amalgam removal and disposal.
6. The compliance date for these requirements is July 12, 2020.
7. For existing sources, including those facilities that do not place or remove amalgam, a One-Time Compliance Report must be submitted to the Control Authority no later than October 12, 2020, or 90 days after a transfer of ownership. For new sources, a One-Time Compliance Report must be submitted to the Control Authority no later than 90 days following the introduction of wastewater into a POTW.

CoLA's program also entails the permitting of the dental offices with Amalgam separators. The permit will include the requirements of the federal regulation with reporting requirements. The permits will be written after receipt of your completed paperwork.

CoLA is ready to assist you to achieve compliance. The following documents are included with this letter.

1. Dental Amalgam Rule Flow Chart – To help you determine what paperwork is required of your location – plus the required federal deadlines.
2. Dental Amalgam Discharger Information Form – Used if you are not ready at this time to do your One-Time Compliance report. This is a short form which supplies us with the information to create your permit and determine your compliance deadlines. May be used for some types of exemptions.
3. Dental Amalgam One-Time Compliance Report – mandatory report for those offices required to have Amalgam separators. Also used for Dental Offices that are exempt.
* To facilitate filling out the form, it is also available in a word format which can be requested at contact me at 717-272-2841 or compliance@lebanonauthority.org.

During the initial period and if you continue to meet deadlines – regular fees are waived (this waiver may be revoked without notice).

Fee Schedule	
Initial Short Form submittal fee* – administrative; review and recording	\$25
One-Time Compliance Form fee *– administrative; review and recording	\$50
Permit Fee*	\$50
Notices of Violation Administrative Fee	\$100
Inspection after late/non-response, other administrative work	\$50 / hr

The deadline for responding to this letter is 60 days from receipt. These notices will be hand delivered or sent certified mail with receipt. Further deadlines are specified by federal regulation and your future permit. The draft permit will be sent to you for your review and comment.

Please contact myself of Tom Demler at 717-272-2841 or compliance@lebanonauthority.org with any questions or comments.

Sincerely,

Cora A. Shenk
Compliance Manager
Enclosures

For additional information and to view the complete regulation, please visit USEPA’s website: <https://www.epa.gov/eg/dental-effluent-guidelines>.

Further information and assistance can be found on the ADA website : <http://www.ada.org/en/advocacy/advocacy-issues/dental-amalgam>