

DENTAL OFFICE COMPLIANCE REQUIREMENTS

Dental offices are required to comply with the Environmental Protection Administration's (EPA) Dental Office Category Rule 40 CFR Part 441. Clean Water Services (CWS), a sewer and stormwater utility, is a control authority that conducts mandatory compliance inspections to ensure that dental offices are in compliance with the EPA's Dental Office Category Rule.

Every year, CWS cleans more than 24 billion gallons of Washington County's used water to near drinking water standards before returning most of the water to the Tualatin River. Because the Tualatin River is so small, slow, and sensitive, CWS operates under some of the most stringent water quality standards and innovative management techniques in the nation. Those standards are set in a National Pollutant Discharge Elimination System (NPDES) permit and are regulated by the Oregon Department of Environmental Quality (DEQ). Vacuum lines, sinks, and toilets in dental office all lead to CWS wastewater treatment facilities which cleans water and releases it into the Tualatin River. CWS' facilities aren't designed to remove metals like mercury, silver, and lead.

EXEMPT DENTAL OFFICES

An office is exempt if it does not discharge any amalgam process wastewater to a Publicly Owned Treatment Works (POTW), unless in a limited emergency, unplanned, or unanticipated circumstance, as defined by the EPA's Dental Office Category Rule 40 CFR Part 441. Practices that are typically exempt include oral pathology, oral and maxillofacial radiology, oral and maxillofacial surgery, orthodontics, periodontics, prosthodontics, and mobile dental offices. If your office is a mixture of non-exempt and exempt practices, then the office is non-exempt. CWS has the authority to inspect dental offices to verify its exemption status.

EXEMPT AND NON-EXEMPT DENTAL OFFICES MUST CONDUCT THE FOLLOWING, PER EPA'S DENTAL OFFICE CATEGORY RULE PART 441.

Submit a One Time Compliance Report.

EPA's Dental Office Category Rule 40 CFR Part 441 requires all dental offices to complete a One Time Compliance Report which verifies their facility information regardless of whether they are exempt from inspections.



MORE INFORMATION

Go to Waste Prevention and Disposal on Clean Water Services; webpage at cleanwaterservices.org/dental OR scan the QR code below.



Offices must submit or resubmit the One Time Compliance Report under the following circumstances:

- **New offices** are required to submit the One Time Compliance Report within 90 days of the first time you dispose of wastewater to the POTW.
- **Changes in ownership** require the resubmittal of the One Time Compliance Report 90 days after transferring reflecting new ownership.

Non-Exempt dental offices must do the following, per EPA's Dental Office Category Rule 40 CFR Part 441.

- **Install a compliant amalgam separator or an equivalent device. Maintain said compliant amalgam separator or equivalent device as required by the manufacturer.** Many amalgam separators must be changed out on an annual or biannual basis. If the amalgam separator is not maintained, the amalgam may bypass the separator and go down the drain.
- **Waste amalgam must not be discharged to a publicly owned treatment plant (POTW).** Ensure that any amalgam-containing material is not discharged to the POTW and is collected in an amalgam waste bucket, including the following:
 - Chairside traps
 - Large amalgam particles
 - Extracted teeth with amalgam
 - Vacuum filters
 - Unused amalgam
 - Empty capsules

NOTE: CWS recommends that dental offices send waste buckets at the frequency recommended by the waste bucket company. This is typically after one year of use, or when the bucket is full – whichever comes first. Ensure that you follow the recycler's information on how to recycle certain items into the waste bucket.

- **Do not use line cleaners with a pH lower than 6 or greater than 8 on dental unit water lines, chair-side traps, or vacuum lines that discharge amalgam process wastewater to a POTW.** These lines must not be cleaned with oxidizing or acidic cleaners, including but not limited to bleach, chlorine, iodine, or peroxide that have a pH lower than 6 or greater than 8 (i.e. cleaners that may increase the dissolution of mercury).
- **The Dental facilities subject to this rule must maintain the following documents and make them available for inspection in either a physical or electronic format for a minimum of three years.**
 1. Documents related to inspection of amalgam separators and follow-up actions;
 2. Documentation of amalgam retaining container or replacement, including date, if applicable;
 3. Documents related to dental amalgam pickup or shipment for proper disposal by a licensed storage or disposal facility;
 4. Documentation of any repair or replacement of an amalgam separator or device;
 5. Manufacturer's current operating manual for the device in place.

NOTE: "Silver fixer waste and lead waste produced by X-ray systems is hazardous waste and must be disposed of accordingly.