

# Dental Amalgam Rule FAQs

## What are the basic requirements of the rule?

For dental dischargers that were discharging into the City of Phoenix owned sewer system or publicly owned treatment works (POTW) prior to July 14, 2017, “existing sources”, compliance with standards was required by July 14, 2020 and a One-Time Compliance Report certifying such was required to be submitted to the Control Authority no later than October 12, 2020, or 90 days after a transfer of ownership.

For dental dischargers whose first discharge into the City of Phoenix POTW occurred after July 14, 2017, “new sources”, compliance with standards is required immediately and a One-Time Compliance Report certifying such must be submitted to the Control Authority no later than 90 days following the introduction of wastewater to the sewer.

Exempt facilities must still file a One-Time Compliance Report certifying that no dental amalgam is placed and that no dental amalgam is removed except in limited emergency or unplanned, unanticipated circumstances or that they fall under the exempt specialties.

The One-Time Compliance Report must be signed and certified by a responsible corporate officer, a general partner or proprietor if the dental discharger is a partnership or sole proprietorship, or a duly authorized representative in accordance with the requirements.

## Who is the Control Authority?

The local wastewater utility, which is the City of Phoenix. Dental Facilities connected to the City of Phoenix owned sewer system must submit the One-Time Compliance Report to the City of Phoenix Water Department Environmental Services Division, 2474 S 22nd Ave, Phoenix, AZ 85009.

## What does compliance entail?

Installation, operation, and maintenance of one or more amalgam separators that meet the following requirements:

1. Compliant with either the American National Standards Institute (ANSI) American National Standard/American Dental Association (ADA) Specification 108 for Amalgam Separators (2009) with Technical Addendum (2011) or the International Organization for Standardization (ISO) 11143 Standard (2008) or subsequent versions so long as that version requires amalgam separators to achieve at least a 95% removal efficiency. Compliance must be assessed by an accredited testing laboratory under ANSI's accreditation program for product certification or a testing laboratory that is a signatory to the International Laboratory Accreditation Cooperation's Mutual Recognition Arrangement. The testing laboratory's scope of accreditation must include ANSI/ADA 108-2009 or ISO 11143.
2. The amalgam separator(s) must be sized to accommodate the maximum discharge rate of amalgam process wastewater.
3. The amalgam separator(s) must be inspected in accordance with the manufacturer's operating manual to ensure proper operation and maintenance of the separator(s) and to confirm that all amalgam process wastewater is flowing through the amalgam retaining portion of the amalgam separator(s).

Implementation of the following best management practices (BMPs):

1. 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.

2. 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.

## Do I have to replace my existing separator?

It depends. The rule allows dental dischargers that had installed and were using an amalgam separator prior to June 14, 2017 to continue to use it until June 14, 2027 if it is functioning properly and does not need to be replaced. This is referred to as a “grandfathering” provision or clause. Facilities were required to file a one-time compliance report certifying such by October 12, 2020. If the amalgam separator meets the standards of the rule the grandfathering provision need not apply.

If a dental discharger covered by the grandfather clause transfers ownership, the new owner may continue using the grandfathered separator until June 14, 2027 if it is functioning properly and does not need to be replaced. The new owner must still file the one-time compliance report.

## Where can I find more information?

The Federal Register notice for the rule, along with other information, can be found on EPA’s Effluent Guidelines website at [www.epa.gov/eg/dental-effluent-guidelines](http://www.epa.gov/eg/dental-effluent-guidelines).

The final rule published on the Federal Register can be found at <https://www.federalregister.gov/documents/2017/06/14/2017-12338/effluent-limitations-guidelines-and-standards-for-the-dental-category>

The American Dental Association provides resources for dental amalgam compliance at [https://success.ada.org/en/regulatory-legal/amalgam?utm\\_medium=VanityUrl](https://success.ada.org/en/regulatory-legal/amalgam?utm_medium=VanityUrl).

City of Phoenix Water Department, Environmental Services Division [www.phoenix.gov/fog](http://www.phoenix.gov/fog).