



Dental Offices

- Vermont Law for dental offices
- Federal Amalgam Rule
- Electronic Reporting

COMPREHENSIVE MERCURY MANAGEMENT – 10 V.S.A. §7110



- Install an amalgam separator – January 1, 2007
- Complete a Self-Certification form by January 31st every odd numbered year.
- Agency to survey dental offices every 5 years to ascertain the use of dental amalgam – VSDS (2012 & 2017) – 2019 added to reporting
- RCRA requirements - obtain an EPA ID number to ship amalgam waste.

Dental Clinic – Dental Office – Dental Practice

Exclusions:

- Orthodontists
- Periodontists
- **Endodontists**
- Oral & maxillofacial surgeons

2007/2009 /2011/2013 – Paper submission
2015 – 121 Paper/Electronic 100/2 both
2017- Mandatory electronic submissions
2019 – Added federal submission requirements

anronline.vermont.gov

2017 ELECTRONIC REPORTING

- nForm - Windsor Solutions database product- environmental organizations
- Entry Data captured in database – subsequent yrs. autofill basic info
- Vermont Questions include:
 - EPA ID number (RCRA)
 - Amalgam use and frequency
 - Use of film-based process for dental x-rays (RCRA)
 - Wastewater discharge (municipal or septic)
 - Number of chairs at which amalgam might be placed or removed.
 - Model and Manufacturer of amalgam separator
 - Month and year most recent replacement of amalgam cartridge
 - Does the Practice comply with all Vermont Dental BMPs



FEDERAL AMALGAM RULE vs. VERMONT AMALGAM LAW VERMONT

July 2017- Federal Amalgam Rule – by July 14, 2020, for existing sources – VT is control authority

REQUIREMENTS THAT ARE THE SAME

- Installation of an amalgam separator that achieves 95% removal rate.
- All dental facilities that place/remove dental amalgam must report.
- Dental facilities must follow Best Management Practices.
- Dental facilities must follow maintenance guidance in amalgam separator owner's manual. Visual weekly inspections of separator and inspection log maintained.
- Dental office must keep track of when amalgam separator cartridge is replaced according to the guidelines in owner's manual.

EPA REQUIREMENTS THAT ARE DIFFERENT

- Endodontists are not exempt.
- One-time only certification to state unless change in ownership.
- Names of all operators & number of chairs where amalgam is removed or replaced.
- Name of 3rd party servicing separator.
- Amalgam Separator Inspection Reports
 - ⇒ Retained for three years.
 - ⇒ Includes: Dates, person conducting inspection and results of inspections.
- Must replace separator every 10 yrs. or 10 years from the date of the rule.

•Summer 2018- VSDS conference

•Fall 2018- added federal questions & survey questions to on-line form

•Feb 2019- all VT offices in compliance with fed/state

2019 BMP reporting included federal

- General Practice Information
- Practice Address and Contact Information
- Practice Owner and Operator Information
- Amalgam Separator Information
- Practice Certification Information
- Review
- Certify & Submit

General Practice Information

CLEAR SECTION

PLEASE NOTE: All questions that end with (U.S. EPA) are questions that have been added to this form to address the NEW EPA One-Time Compliance Report for Dental Dischargers.

If you are interested in learning more about the federal One-Time Compliance Report for Dental Dischargers requirement, visit this page on the EPA website...

[EPA Dental Effluent Guidelines](#)

Practice ID Number
1

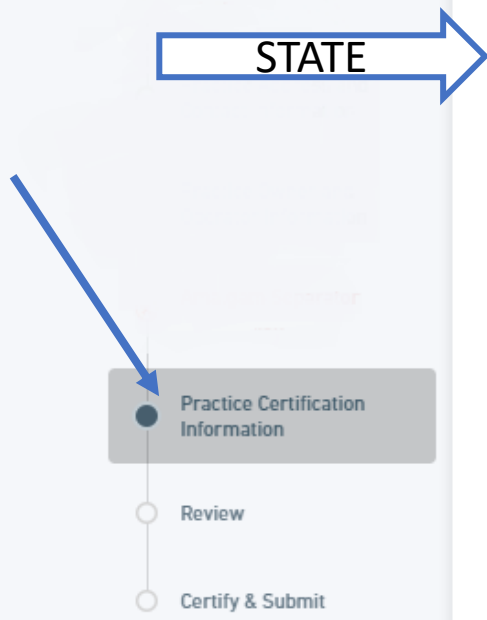
Practice Name (If the practice name has changed, please change it here)

Practice Type

- Family
- General
- Pediatric
- Pedodontics
- Prosthodontics
- Other

Practice Phone (Format: 123-456-7890 Ext 123)

- Each dental office assigned a number
- The number accesses their saved info
- New facility or sold to another office = new number

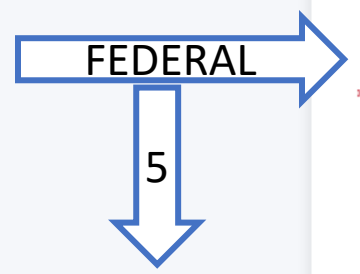


Does this practice comply with ALL applicable Vermont DEC Dental Best Management Practices?
 Yes
 No

FEDERAL CERTIFICATIONS

The U.S. Environmental Protection Agency's (EPA) website related to the Dental Effluent Guidelines can be found here:
[EPA Dental Effluent Guidelines](#)

The EPA regulations referenced in the certification statements below (i.e. § 441.30, § 441.40, and § 441.50) can be found here:
[Code of Federal Regulations \(CFR\) Part 441 Dental Office Point Source Category](#)



I certify that the amalgam separator is designed and will be operated and maintained to meet the requirements in § 441.30 or § 441.40 and that recordkeeping requirements as specified in § 441.50(b)(1)-(5) are being met and those records can be made available for inspection in either physical or electronic form for a minimum of three years. (U.S. EPA)
 I Certify

I certify that I will visually inspect the amalgam separator in accordance with the manufacturer's operation manual to ensure proper operation and maintenance, including confirmation that amalgam process wastewater is flowing through the



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Mercury Web Site www.mercvt.org

https://youtu.be/VVzm_XYrak0

M.E.R.C.  **t**
Mercury Education & Reduction Campaign