

Dental effluent guidelines UPDATE – June 2017



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In March of 2017 we reported:

The Environmental Protection Agency's (EPA) final rule on dental effluent guidelines (amalgam separators, certain line cleaners) was released December 15, 2016. However, as of January 2017 the rule has been suspended and is subject to further review.

Notwithstanding the updated information on this proposed regulation and its current withdrawal from the Federal Register, some states and localities have enacted effluent guidelines/rules that already require your compliance. By way of example, under Michigan Board of Dentistry Rules, R 338.11811 Amalgam separator; installation and operation; requirements. Rule 1811. (1): "On or before December 31, 2013, a dentist shall install, or shall have installed, an amalgam separator on each wastewater drain in his or her dental office that is used to discharge dental amalgam waste."

JUNE 2017 UPDATE

On June 9, 2017, the EPA issued an updated final rule governing the management of dental amalgam waste discharges into sewer systems. The rule will be [effective July 14, 2017](#), and most dentists must comply by July 14, 2020.

The final rule includes exemptions, a phase-in period for existing dental offices, and considerations for dental practices with installed separator devices. As of July 14, 2017, any new dental offices which discharge dental amalgam must comply immediately with the standards in this rule.

Some of the final rule's exemptions include:

- *Wastewater discharges from dental offices where the practice of dentistry consists exclusively of one or more of the following dental specialties: oral pathology, oral and maxillofacial radiology, oral and maxillofacial surgery, orthodontics, periodontics, or prosthodontics.*
- *Dental dischargers that do not place dental amalgam, and do not remove dental amalgam except in limited emergency or unplanned, unanticipated circumstances are exempt from any further requirements as long as they certify such in their One-time Compliance Report to their Control Authority.*
- *Wastewater discharges to publicly owned sewage treatment plants from mobile units.*
- *Dental offices may continue to operate existing amalgam separators for their lifetime or ten years (whichever comes first), as long as the dental discharger complies with the other rule requirements including the specified best management practices, operation and maintenance, reporting, and recordkeeping requirements.*

The final rule is not yet officially published. Read the [unpublished report](#) to gain valuable insight into the rule's compliance requirements.

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