

EPA Amalgam Recycling Rule



NO SEPARATOR OR NEW OFFICE? MUST INSTALL

All non-exempt practitioners must install a compliant separator by July 14, 2020. Newly opened offices that begin operating on or after July 14, 2017 must be in compliance immediately.

Must file a One-Time Compliance Report within 90 days of installation.



SEPARATOR ALREADY INSTALLED?

Good for 10 years or unit needs to be replaced, whichever comes first.

Must file a One-Time Compliance Report by October 12, 2020 or 90 days after transfer of ownership.



EXEMPT FROM INSTALLING

Dentists exclusively practicing in one of these specialties: oral pathology; oral + maxillofacial radiology; oral + maxillofacial surgery; orthodontics; periodontics; prosthodontics.

Also exempt: Dental mobile unit; dentists who do not place amalgam and do not remove amalgam except in limited emergency or unplanned, unanticipated circumstances, and who certify as such (estimated less than 5%).

Must file a One-Time Compliance Report by October 12, 2017 or 90 days after transfer of ownership. Keep on record for lifetime of practice ownership.

Installed amalgam separators must comply with the following best management practices:

1. File a One-Time Compliance Report. Keep on record for lifetime of ownership.
2. Monitor according to manufacturer's recommendation.
3. Replace/Repair if malfunctioning according to manufacturer's instructions within 10 business days of discovering defect.
4. Maintain by replacing amalgam retaining cartridge, separator canister or units as directed by manufacture or annually, whichever comes first.
5. No use of oxidizing, acidic cleaners when flushing dental unit water lines, chair-side traps and vacuum lines. Therefore no bleach, chlorine, iodine and peroxide cleaning agents that have a pH of lower than 6 or greater than 8.

Must maintain records on site for 3 years of:

1. Any reports filed
2. A visual inspection log
3. Documentation of any repair or replacement
4. Disposal records
5. Manufacturer's current operating manual for the device in place