



To whom it may concern,

On June 14, 2017, the USEPA promulgated pretreatment standards (40 CFR 441) to reduce discharges of mercury from dental offices into municipal sewage treatment plants known as Publicly Owned Treatment Works (POTWs). The final rule requires dental offices to use amalgam separators and the Best Management Practices (BMPs) recommended by the American Dental Association (ADA). As the local Control Authority, Spanish Fork City is required to implement and enforce the regulation. A summary of the regulation follows:

1. The regulation is applicable to all dental dischargers that remove or replace amalgam. It does not apply to dental dischargers that exclusively practice one or more of the following dental specialties: oral pathology, oral and maxillofacial radiology, oral and maxillofacial surgery, orthodontics, periodontics, or prosthodontics. Also excluded are mobile units and those practices that only remove or place amalgam in limited emergency or unplanned circumstances.
2. All amalgam process wastewater must be treated prior to discharge to the POTW utilizing an amalgam separator meeting specific performance standards outlined in the regulation. Existing separators installed prior to June 14, 2017 meet this requirement until the separator is replaced or until June 14, 2027, whichever is sooner.
3. 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.
4. 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.

5. Recordkeeping requirements include documentation of inspection, maintenance and repair of the separator, amalgam removal and disposal, as well as training of staff and personnel.
6. The compliance date for these requirements is July 12, 2020.
7. For existing dental dischargers, including those facilities that do not place or remove amalgam, a OneTime Compliance Report (enclosed) must be submitted to Spanish Fork City as soon as possible but no later than October 12, 2020. One should also be completed within 90 days of a transfer of ownership. For new dental dischargers a One-Time Compliance Report must be submitted to the Control Authority no later than 90 days following the introduction of wastewater into a POTW.

For additional information and to view the complete regulation, please visit USEPA's website: <https://www.epa.gov/eg/dental-effluent-guidelines>. Further information and assistance can be found on the ADA website: <http://www.ada.org/en/advocacy/advocacy-issues/dental-amalgam>.

Spanish Fork City is also ready to assist you to achieve compliance. Should you have any questions or comments do not hesitate to contact me at (801) 804-4466 or cpierce@spanishfork.org.

Sincerely,



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