



**ONE-TIME COMPLIANCE REPORT FOR DENTAL DISCHARGERS  
to Comply with 40 CFR 441.50  
Effluent Limitations Guidelines and Standards for the Dental Office Category**

**Instructions:**

This form contains the minimum information dental facilities must submit in a one-time compliance report as required by the Effluent Limitations Guidelines and Standards for the Dental Office Category (“Dental Amalgam Rule”). See [the applicability section \(§ 441.10\)](#) to determine facility’s submittal requirements. For more information please see EPA’s website: [www.epa.gov/eg/dental-effluent-guidelines](http://www.epa.gov/eg/dental-effluent-guidelines), or contact City of Franklin Wastewater Department, Email: [jonathan.villostas@franklintn.gov](mailto:jonathan.villostas@franklintn.gov) or phone 615-791-3240.

**Submittal of One-Time Compliance Report:** Submit completed and signed report to:

**City of Franklin WWTP  
Dental Amalgam Rule Report  
135 Claude Yates Drive  
Franklin, TN 37064**

**General Information**

Name of Facility				
Physical Address of Dental Facility				
City:		State:		Zip:
Mailing Address				
City:		State:		Zip:
Facility Contact				
Phone:		Email:		
Names of Owner(s):				
Names of Operator(s) if different from Owner(s):				

**Applicability: Please Select One of the Following**

<input type="checkbox"/>	This facility is a dental discharger subject to this rule ( <a href="#">40 CFR Part 441</a> ) and it places or removes dental amalgam. <i>Complete sections A, B, C, D, and E</i>
<input type="checkbox"/>	This facility is a dental discharger subject to this rule and (1) it does not place dental amalgam, and (2) it does not remove amalgam except in limited emergency or unplanned, unanticipated circumstances. <i>Complete section E only</i>

**(Also, select if applicable) Transfer of Ownership ([§ 441.50\(a\)\(4\)](#))**



<input type="checkbox"/>	This facility is a dental discharger subject to this rule ( <a href="#">40 CFR Part 441</a> ), and it has previously submitted a one-time compliance report. This facility is submitting a new One Time Compliance Report because of a transfer of ownership as required by <a href="#">§ 441.50(a)(4)</a> .
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**Section A**

**Description of Facility**

Total number of chairs:		
Total number of chairs at which amalgam may be present in the resulting wastewater (i.e., chairs where amalgam may be placed or removed):		
Description of any amalgam separator(s) or equivalent device(s) currently operated:		
YES <input type="checkbox"/>	NO <input type="checkbox"/>	The facility discharged amalgam process wastewater prior to July 14th, 2017 under any ownership.

**Section B**

**Description of Amalgam Separator or Equivalent Device**

<input type="checkbox"/>	The dental facility has installed one or more ISO 11143 (or ANSI/ADA 108-2009) compliant amalgam separators (or equivalent devices) that captures all amalgam containing waste at the following number of chairs at which amalgam placement or removal may occur:	<i>Chairs:</i>
<input type="checkbox"/>	The dental facility installed prior to June 14, 2017 one or more existing amalgam separators that do not meet the requirements of <a href="#">§ 441.30(a)(1)(i)</a> and <a href="#">(ii)</a> at the following number of chairs at which amalgam placement or removal may occur: I understand that such separators must be replaced with one or more amalgam separators (or equivalent devices) that meet the requirements of <a href="#">§ 441.30(a)(1)</a> or <a href="#">§ 441.30(a)(2)</a> , after their useful life has ended, and no later than June 14, 2027, whichever is sooner.	<i>Chairs:</i>
	<b>Make</b>	<b>Model</b>
		<b>Year of installation</b>
<input type="checkbox"/>	My facility operates an equivalent device.	



Make	Model	Year of installation	Average removal efficiency of equivalent device, as determined per <a href="#">§ 441.30(a)(2)i- iii.</a>

**Section C**

**Design, Operation and Maintenance of Amalgam Separator/Equivalent Device**

<input type="checkbox"/>	YES	I certify that the amalgam separator (or equivalent device) is designed and will be operated and maintained to meet the requirements in <a href="#">§ 441.30</a> or <a href="#">§ 441.40</a> .	
A third-party service provider is under contract with this facility to ensure proper operation and maintenance in accordance with <a href="#">§ 441.30</a> or <a href="#">§ 441.40</a> .			
<input type="checkbox"/>	YES	Name of third-party service provider (e.g. Company Name) that maintains the amalgam separator or equivalent device (if applicable):	
<input type="checkbox"/>	NO	If none, provide a description of the practices employed by the facility to ensure proper operation and maintenance in accordance with <a href="#">§ 441.30</a> or <a href="#">§ 441.40</a> .	
<i>Describe practices:</i>			

**Section D**

**Best Management Practices (BMP) Certifications**

<input type="checkbox"/>	The above named dental discharger is implementing the following BMPs as specified in <a href="#">§ 441.30(b)</a> or <a href="#">§ 441.40</a> and will continue to do so.
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- 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 publicly owned treatment works (e.g., municipal sewage system).
- Dental unit water lines, chair-side traps, and vacuum lines that discharge amalgam process wastewater to a publicly owned treatment works (e.g., municipal sewage system) 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 (i.e. cleaners that may increase the dissolution of mercury).

**Section E**

**Certification Statement**

Per [§ 441.50\(a\)\(2\)](#), the One-Time Compliance Report must be signed and certified by a responsible corporate officer, a general partner or proprietor if the dental facility is a partnership or sole proprietorship, or a duly authorized representative in accordance with the requirements of [§ 403.12\(l\)](#).

*"I am a responsible corporate officer, a general partner or proprietor (if the facility is a partnership or sole proprietorship), or a duly authorized representative in accordance with the requirements of § 403.12(l) of the above named dental facility, and certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

Authorized Representative Name (print name):			
Phone:		Email:	
Authorized Representative Signature		Date	

**Retention Period; per [§ 441.50\(a\)\(5\)](#)**

As long as a Dental facility subject to this part is in operation, or until ownership is transferred, the Dental facility or an agent or representative of the dental facility must maintain this One-Time Compliance Report and make it available for inspection in either physical or electronic form.

Juan Davis  
Plant Superintendent



Dr. Ken Moore  
Mayor

Eric S. Stuckey  
City Administrator

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HISTORIC  
FRANKLIN  
TENNESSEE

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DATE: May 30, 2018

TO: Dental Office Authorized Representative

**RE: Dental Office Requirements to meet the EPA Dental Amalgam Rule – Dental Office Category Regulation per 40 Code of Federal Regulations (CFR) Part 441**

Any new dental offices that start operation after July 14, 2017 are required to meet the requirements of 40 CFR Part 441 prior to the initiation of operations. Also, existing dental offices must meet the requirements of the new regulation by July 14, 2020. The City is encouraging dental offices to meet the requirements as soon as possible to prevent any mercury discharges to the sewer system. Information about the requirements to meet the 40 CFR Part 441 requirements are provided at <https://www.epa.gov/eg/dental-effluent-guidelines> . Basically, the requirements include completion of a “One Time Compliance Report”, and if applicable, installation of an approved amalgam separator, maintenance of equipment, and records documentation.

Enclosed is the City of Franklin Wastewater Department’s “**One-Time Compliance Report for Dental Dischargers**” that needs to be completed and signed. Note that existing dental offices that place or remove dental amalgam must operate and maintain an approved amalgam separator, maintain maintenance records, and implementation of best management practices to prevent discharge of waste amalgam and not using oxidizing or acidic cleaners. Dental Offices that will not place or remove dental amalgam except in limited circumstances, or where the practice of dentistry consists only of the following dental specialties: oral pathology, oral and maxillofacial radiology, oral and maxillofacial surgery, orthodontics, periodontics, or prosthodontics, must complete and sign the enclosed report (see Applicability section and Section E).

Additional information is provided at the EPA website listed in paragraph one of this letter, and on the City of Franklin website: <http://www.franklin-gov.com/government/water-management-department/wastewater-division> . Please contact Jonathan Villostas, City of Franklin Pretreatment Coordinator, if you have any questions or need any additional information, Email: [jonathan.villostas@franklintn.gov](mailto:jonathan.villostas@franklintn.gov) or phone City of Franklin Water Reclamation Facility at 615-791-3240.

Sincerely,

*Juan Davis*

Juan Davis  
Superintendent, Water Reclamation Facility  
City of Franklin, TN

# Fact Sheet: Effluent Limitations Guidelines and Standards for Dental Offices

## Summary

EPA finalized technology-based pretreatment standards under the Clean Water Act to reduce discharges of mercury and other metals from dental offices into municipal sewage treatment plants known as publically owned treatment works (POTWs). Dental offices, which discharge mercury and other metals present in amalgam used for fillings, are the main source of mercury discharges to POTWs; these metals are subsequently released to the environment. The rule requires dental offices to comply with requirements based on practices recommended by the American Dental Association, including the use of amalgam separators. Once captured by the separator, dental amalgam can be recycled. Removing mercury when it is concentrated and easy to manage, such as through low-cost amalgam separators at dental offices (average annual cost per dental office is about \$800), is a common sense solution to managing mercury that would otherwise be released to air, land, and water.

In addition, this rule minimizes dental office reporting requirements and the administrative burden to federal, state, and local regulatory authorities responsible for oversight of the new requirements.

EPA expects compliance with this final rule will reduce the discharge of metals to POTWs by at least 10.2 tons per year, about half of which is mercury.

EPA projects the total annual cost of the final rule will be \$59 - \$61 million.

## Background

### *Why are standards needed for the dental industry?*

When dentists remove old amalgam fillings from cavities, or when dentists place a new filling, mercury in the form of dental amalgam enters the wastewater of the dental office. Mercury from waste amalgam can make its way into the environment from the POTW through the incineration, landfilling, or land application of sludge or through surface water discharge. Mercury is a potent neurotoxin that can have a wide range of health effects, and mercury pollution is a global concern. Once released into the aquatic environment, certain bacteria can change mercury into methylmercury, a highly toxic form of mercury that bioaccumulates in fish and shellfish. Eating fish and shellfish is the main source of people's exposure to methylmercury in the U.S.

### **Who is affected by this regulation?**

This rule applies to offices, including large institutions such as dental schools and clinics, where dentistry is practiced that discharge to a POTW. It does not apply to mobile units or offices where the practice of dentistry consists only of the following dental specialties: oral pathology, oral and maxillofacial radiology, oral and maxillofacial surgery, orthodontics, periodontics, or prosthodontics.

Control Authorities (which are often the state or POTW) are responsible for oversight associated with this rule.

### **What does this rule require of dental offices?**

Dental offices that discharge to POTWs that do not place or remove amalgam need only submit a one-time certification.

Dental offices that place or remove amalgam must operate and maintain an amalgam separator and must not discharge scrap amalgam or use certain kinds of line cleaners. They must also submit a One-Time Compliance Report.

### **Where can I find more information?**

You can access the Federal Register notice on EPA's Effluent Guidelines website at: [www.epa.gov/eg/dental-effluent-guidelines](http://www.epa.gov/eg/dental-effluent-guidelines). In addition, the final rule will be available at [regulations.gov](http://regulations.gov) under Docket ID: EPA-HQ-OW-2014-0693.

You may also email Karen Milam at [milam.karen@epa.gov](mailto:milam.karen@epa.gov).

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