

Answers to questions about...

DENTAL AMALGAM RULE

What is the Dental Amalgam Rule?

The Dental Amalgam Rule is a technology-based Pretreatment Standard under the Clean Water Act that will reduce discharges of mercury from dental offices to sewage treatment plants, such as the Orange County Sanitation District (OC San). The 40 CFR §441 can be found in the Code of Federal Regulations. The Environmental Protection Agency (EPA) has a Dental Effluent Guidelines website, with Frequently Asked Questions, which has additional details.

When did the Dental Amalgam Rule become effective?

July 14, 2017.

Who does the Dental Amalgam Rule apply to?

All dental offices that place or remove dental amalgam.

Are there any exemptions to the Dental Amalgam Rule?

Yes, the rule does not apply to Dental Dischargers that exclusively practice one or more of the following exempt dental specialties: Oral Pathology, Oral and Maxillofacial Radiology, Oral and Maxillofacial Surgery, Orthodontics, Periodontics, Prosthodontics, Dental Mobile Units, and any dental office which does not discharge to OC San. Please notify OC San of your exempt status via the “Dental Discharger Compliance Report”.

What must my dental office do to comply with the EPA’s requirements?

- Complete and submit the “Dental Discharger” Compliance Report.
- Ongoing requirements, such as employee training, best management practices, and record keeping requirements, as applicable, are included in the form.

Where do I get the Dental Discharger Form?

Form can be found on OC San’s [Dental Office Point Source Form webpage](#), under the heading “COMPLIANCE REPORT FORM.”



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What are the most common issues when completing the form?

- Not filling out all of the required information found on the “Dental Discharger” Compliance Report form.
 - All information requested on the form address information collection requirements issued by the EPA
- If selecting to sign the form as a “duly authorized representative”, you **MUST** follow the requirements of 40 CFR 403.12(l), otherwise OC San will not accept the form.
 - While this option is available, certifying as a “responsible corporate officer” does not come with this same requirement.
 - Note that an official title must be used for ownership, “Dentist” is not an acceptable title
- Not receiving a live or “wet” signature.
 - A copy of a signed form is **NOT** a “wet” signature.
 - OC San is required to receive a “wet” signature report to have on file.
 - OC San **WILL NOT** accept a completed report without a “wet” signature.

What is the process for verifying the report is complete?

There are four steps involved in the process:

1. Fill out the form and press the blue submit button. **DO NOT SIGN.**
2. OC San will respond with an email confirmation once your form is received.
 - a. OC San will follow up with you if there are any items to resolve
 - b. A list of common issues is presented above under “most common issues”
3. Once verification is complete, OC San will send an email confirmation and require that you finalize the report by completing the following:
 - a. Print and sign two copies of the report
 - b. Save one “wet” signature for your records
 - c. Send one “wet” signature to OC San as listed on the report
4. Once OC San receives the complete report with the “wet” signature, a final email confirmation will be sent.

Who can I contact with questions?

Contact information is listed in the “Need More Information” box on the OC San Dental Office Point Source Form page.

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