



Joanne M. Mahoney, County Executive
Tom Rhoads, P.E., Commissioner
650 Hiawatha Blvd. West
Syracuse, NY 13204-1194
(315) 435-2260 or (315) 435-6820
FAX (315) 435-5023
<http://www.ongov.net/wep/>

August 9, 2013

Ms. Amy Pozzi
5th District Dental Society
6323 Fly Road, Suite 3
East Syracuse, New York 13057

Re: Dental Amalgam Separator Inspections

Dear Ms. Pozzi:

This letter is a follow-up to one sent last year regarding dental amalgam waste handling. We (Onondaga County WEP) are working on a mercury minimization program required by New York State Pollution Discharge System Elimination Permits, which govern all aspects of our wastewater system. Part of this program involves inspecting dental offices and their compliance with the requirements of 6 NYCRR 374 (see attached). In short, this law requires dental offices that place or remove dental amalgam to install, operate, and maintain amalgam separators and minimize the discharge of mercury to the public sewer system and the environment.

We are now in the process of inspecting dental offices and have found most operating and maintaining amalgam separators very well. However, very few offices were following the law exactly to the letter. As a result, we would like to point out areas of improvement so that your member dentists can be in compliance with the regulations. If you have a newsletter, it may be helpful to publish these and a link to the Frequently Asked Questions page on the NYSDEC web site (see attached copy).

- Filters must be changed when full. We recommend that dentists inspect their amalgam separators at least monthly, and maintain them in accordance with manufacturer's recommendations (Part 374-4.2 (a)(5)).
- Dentists must have amalgam waste storage containers (Part 374-4.2 (b)). The law requires dentists to store amalgam wastes in air-tight, leak-proof and structurally sound containers that are labeled with the contents, and used for no more than one year from the date of first use.
- Dentists must comply with the record keeping requirements of Part 374-4.2 (c) and (d). The law requires dentists to keep records of amalgam separator maintenance, and the amount of amalgam waste recycled, for a minimum of three years.
- Dentists must abide by the prohibitions contained in Part 374-4.2 (e). Specifically, we would like to remind dentists that dental amalgam waste, including wastes from chair side traps, vacuum pump filters, and other collection devices, may not be rinsed down the sink, disposed of in the trash, or disposed of as regulated medical waste; it must be managed as amalgam waste and recycled.

We appreciate all that dentists do to maintain the health of our community. Should you have any questions, please contact Robert Burke of this office.

Sincerely,

ONONDAGA COUNTY DEPARTMENT OF
WATER ENVIRONMENT PROTECTION



Tom Rhoads, P.E.
Commissioner

RB/ts

Attach.

cc: 2013 Dental Amalgam Inspection File

Thank you
for sharing
this information
with the local
professional community.