

New Federal Dental Effluent Rules and Important Deadlines

The US Environmental Protection Agency (EPA) has adopted new pretreatment standards, recordkeeping and reporting requirements to reduce discharges of mercury from dental offices into publicly owned treatment works (POTWs). The Dental Office Category regulation is codified in [Title 40 of the Code of Federal Regulations Part 441](#). These regulations mean that dental offices who receive wastewater service from Austin Water (directly or indirectly) are subject to a number of requirements, including one that stipulates the submission of a [One Time Compliance Report](#) to Austin Water to demonstrate your compliance with the law.

More detailed guidance from the EPA is available at: www.epa.gov/eg/dental-effluent-guidelines. You should consult this EPA guidance document and the published rules for much more specific descriptions of the requirements as they apply. For your convenience, the following simplified schedule of important applicable due dates in the regulations is provided below (in the event of any conflict, the EPA guidance and regulatory language governs):

Date	Applicability	Description
June 14, 2017	General	Date the regulations were adopted.
July 14, 2017	General	Effective date of rule. Any Dental Office whose first discharge to a POTW was on or before this date is considered an "Existing Dental Office." Any Dental Office whose first discharge was after this date is considered a "New Dental Office." All Dental Offices subject to this rule are required to comply with recordkeeping requirements including, but not limited to: records related to amalgam separator maintenance, inspections and repairs; and amalgam retaining unit shipment and waste disposal.
July 14, 2017	Deadline for New Dental Offices	New Dental Offices are required to comply with amalgam separator or removal device installation, treatment and disposal requirements by this deadline. Any New Dental Office that starts discharging after this date must install a separator or removal device prior to discharging. Also required to follow certain Best Management Practices related to preventing waste amalgam and mercury from being discharged to POTW.
90 Days after discharge starts or ownership is transferred.	Deadline for New Dental Offices or Existing Dental Offices whose ownership is transferred	One Time Compliance Report must be submitted to Austin Water no later than 90 days after the discharge starts or the ownership transfer is complete. One Time Compliance Report is also subject to recordkeeping requirements.
July 14, 2020	Deadline for Existing Dental Offices	Existing Dental Offices are required to comply with amalgam separator or amalgam removal device installation requirements unless an amalgam separator or removal device had already been installed prior to June 14, 2017 (refer to entry for June 14, 2027). Treatment and disposal requirements apply. Also required to follow certain Best Management Practices related to preventing waste amalgam and mercury from being discharged to POTW.
Any time after July 14, 2020	Existing Dental Offices	Any time an amalgam separator installed before July 14, 2017, reaches the end of its manufacturer's recommended life span or is not working as designed and can no longer be repaired in accordance with manufacturer's specifications, it must be replaced with a separator that meets the more stringent requirements of the rule no more than 10 days later.
October 12, 2020	Deadline for Existing Dental Offices	One Time Compliance Report must be submitted to Austin Water. One Time Compliance Report is also subject to recordkeeping requirements.
June 14, 2027	Final Deadline for Existing Dental Users to Replace Existing Amalgam Separators	Existing Dental Offices that had an amalgam separator that was in place prior to June 14, 2017, must install an amalgam separator or amalgam removal device meeting the more stringent requirements in the rule no later than June 14, 2027. The requirement to replace the separator earlier applies, as noted above, any time separator in place exceeds the recommended lifespan described by the manufacturer or requires any repair other than those allowed in accordance with manufacturer's specifications.