The US Environmental Protection Agency (EPA) recently proposed new guidelines for regulating dental amalgam being discharged to sewer systems. The proposed regulations will directly impact approved pretreatment programs in September, 2015 when the new regulation will be finalized. EPA will be responsible for regulating areas which are not in an approved pretreatment program.

The proposed guidelines were published on October 22, 2014.

Baxter & Woodman’s Environmental Group provides extensive Industrial Wastewater Pretreatment services to Publicly Owned Treatment Works (POTWs) for the safeguard and protection of treatment facilities from commercial and industrial waste discharges and to assist POTWs with their pretreatment program responsibilities. Pretreatment related services Baxter & Woodman provides includes:

- **Legal Authority (Ordinance Writing)**
- **Local Limits Studies**
- **Industrial Waste Surveys**
- **Permitting**
- **Industrial Site Inspections**
- **Sampling and Compliance Monitoring**
- **Enforcement**
- **Data Management and Record Keeping**
- **Annual Reporting**

**Comment Period Extended**

The original 60 day public comment period was extended to 120 days and now expires on February 20, 2015.

Review the proposed rule and make comments by visiting [http://tinyurl.com/ndyqql](http://tinyurl.com/ndyqql).

**2015 Industrial Waste Pretreatment Seminar**

Promote Methods and Technologies for New Regulations

**Topics Covered:**
- Topics included: NPDES and NOSPS Permits
- Integrating Technologies with Industrial Site Surveys and Site Inspections
- Industry Classification Strategies
- NSPS New Source Permit
- New Industry Topics Including the Proposed Dental Rule
- Permit Discharge Handling, Choi & Glenn (13th)
- Biological Nutrient Removal

**Fees and Registrations:**
- $60 per person - Register by Feb. 12th and reserve 50% of space
- Registration Deadline: March 1st, 2015
- Breakfast and lunch will be provided.

To register and for more information, visit [www.baxterwoodman.com/seminar](http://www.baxterwoodman.com/seminar).

Scan the QR code to visit the link on your smartphone!

Questions? Please contact Maggie O’Lear at 847-446-1887 or maggie@baxterwoodman.com

Find out more at our 2015 Industrial Waste Pretreatment Seminar, where professionals will also share their proven methods and technologies for new regulations. [http://www.baxterwoodman.com/seminar/](http://www.baxterwoodman.com/seminar/)
NEW DENTAL AMALGAM EFFLUENT REGULATIONS FAQ’S...

**Q** Where can I find a copy of the proposed rule?

**A** A pdf file of the proposed rule is available for reviewing at [http://tinyurl.com/mmfujqg](http://tinyurl.com/mmfujqg).

**Q** Where can I make comments on the proposed rule?

**A** Comments can be made by visiting [http://tinyurl.com/ndyzqgl](http://tinyurl.com/ndyzqgl).

**Q** How will the proposed rule affect Dental Industrial Users (DIUs)?

**A** DIUs will be required to:
- Submit a one-time baseline report within 180 days of the effective date of the regulation including information regarding the existing office chairs and any existing amalgam separators;
- Install an amalgam separator with 99% removal efficiency within three (3) years of the effective date of the regulation;
- Submit a 90-day final compliance report after the installation of the amalgam separator(s) with certification that they meet requirements of the regulation and that best management practices are being implemented; and
- Submit an annual periodic report demonstrating that best management practices have been met.

**Q** What is a DIU?

**A** A DIU is a dental discharger, defined as a facility where the practice of dentistry is performed, who has opted to comply with the monitoring and reporting requirements in 40 CFR 411 (the proposed rule).

**Q** How will this affect Publicly Owned Treatment Works (POTWs)?

**A** Each POTW with an approved Pretreatment Program will be required to manage the DIUs and annually evaluate if the DIU meets the appropriate criteria. Based on this EPA requirement, review of submitted reports will be required and annual site inspections may be necessary. DIUs that do not install an amalgam separator or are not in compliance with DIU criteria are required to be defined as a Significant Industrial User (SIU) with a discharge permit and required monitoring. Ordinance updates may be necessary to provide POTWs with the control mechanisms to enforce the program. Even Pretreatment Programs that already have a state mercury reduction program, as in Wisconsin, will need to meet the requirements of the federal program. POTWs that do not currently have an approved pretreatment program may be affected in the future if a pretreatment program is implemented.

**Q** What should you do now?

**A** Review the proposal and make comments so your concerns are heard by clicking [here](http://tinyurl.com/mmfujqg). Start developing a list of dental offices to be prepared to meet the program requirements. Please note that when the rule is final, each approved pretreatment program will be required to send a regulation notice to all dental offices that includes a requirement for the submittal of the baseline report within 180 days.

For more information on the proposed rule, or to inquire on how Baxter & Woodman can help, please contact Penny Bouchard at PBouchard@baxterwoodman.com or 815-459-1260.