

State of Vermont
Department of Environmental Conservation

Agency of Natural Resources

Environmental Assistance Office
103 South Main Street, Cannery [phone] 802-241-3626
Waterbury VT 05671-4911 [fax] 802-241-3273

December 22, 2008

RE: Dental Best Management Practices Certification Filing - Due January 31, 2009

Dear Vermont Dentist:

We are writing to remind you of the Dental Best Management Practices Certification form that must be filed no later than **January 31, 2009** (one per dental practice location).

Enclosed is the updated Dental Best Management Practices Certification Form that must be filed every other year (2007, 2009, 2011, etc). The form has been shortened to simplify the filing process. Also enclosed is the list of Dental Best Management Practices that should be followed and posted in a convenient location for reference. The Dental Best Management Practice Certification Form and instructions are also available on our mercury web site: <http://www.mercvt.org/dental/index.htm>. **NOTE: The certification form will no longer be required for orthodontists, periodontists, endodontists, oral and maxillofacial surgeons.**

This Certification filing is required as a result of 2005 Vermont legislation requiring dental offices to comply with environmental best management practices (BMPs) developed by the Vermont Agency of Natural Resources for mercury and amalgam wastes (10 V.S.A., Chapter 164, § 7110). In addition, the law requires dental practices (with some exceptions) to install dental amalgam separators in the wastewater discharge system by January 1, 2007. Information is available on our web site to help you comply with this requirement at <http://www.mercvt.org/dental/index.htm> (Note: Orthodontists, periodontists, endodontists, oral and maxillofacial surgeons, and other practices that do not place or remove amalgam are exempted from the amalgam separator installation requirement.)

Please complete the attached form and mail the signed certification form to the address indicated on the bottom of the form. Please note that this filing is required for each practice, and not by individual dentist. However, if the practice has more than one site location, a certification must be submitted for each site location.

Should you have any questions, please do not hesitate to contact me at (802) 241-3626. Thank you for your cooperation.

Sincerely,



Gary Gulka
Environmental Assistance Office



Dental Best Management Practices

Amalgam Wastes

General

- ✓ All elemental mercury (free, bulk, or raw mercury) has been removed from the premises and sent for recycling.
- ✓ The Dental Practice recycles and intends to continue recycling all amalgam waste from its location, including amalgam from the separator(s), any amalgam scrap from screens, traps, or filters, and any scrap amalgam not fully used in dental procedures.
- ✓ Instructions provided by the amalgam recycler are followed for the packaging, labeling, storage, disinfection (if required), and pickup or shipping of amalgam waste.
- ✓ These practices are followed:
 - Amalgam is not placed in a sharps container.
 - Amalgam is not placed in a red biohazard bag.
 - Amalgam is not discarded in the regular trash.
 - Amalgam is not disposed down the drain.
 - Excess amalgam is not removed from an amalgam well using a high-speed suction (vacuum) line.
 - Extracted teeth with amalgam restorations are not placed in a red biohazard bag, but are recycled with other amalgam wastes in a disinfectant solution (such as glutaraldehyde or formalin), or as directed by the recycler.
 - Used amalgam capsules are not placed in the regular trash but are recycled with other amalgam wastes.

Disposable Chairside Traps

- ✓ Where disposable chairside traps are used, traps are placed into a container for recycling as directed by the recycler.

Reusable Chairside Traps

- ✓ Reusable traps are not rinsed under running water (as this could result in amalgam being discharged down the drain).
- ✓ Where reusable traps are used, all visible amalgam is removed from reusable traps by tapping the contents into a container for amalgam recycling as directed by the recycler.

Vacuum Pump Filters: Vacuum pump filters are only present on wet seal pumps that use water.

- ✓ Filters are changed according to the vacuum pump manufacturer's recommended schedule and recycled as directed by the recycler.

Line Cleaners

- ✓ Only pH neutral, non-bleach, non-chlorine-containing suction line cleaners are used.
- ✓ Lines are cleaned daily on chairs where restorative dentistry is performed and as necessary or according to the vacuum pump manufacturer's recommendations on other chairs.

Amalgam Separators

- ✓ The Dental Practice has installed an amalgam separator to service all of its dental chairs where amalgam is placed or removed. (except for orthodontists, periodontists, and oral and maxillofacial surgeons.)
- ✓ The Dental Practice maintains and operates its amalgam separator(s) according to the manufacturer's instructions (i.e., necessary cleanings, cartridge changes, and other required servicing are performed on schedule).
- ✓ Visual inspections of the separator(s) are conducted at least weekly and an inspection log is maintained.
- ✓ Records related to the amalgam separator(s) (e.g., installation information, inspection logs, and amalgam shipping records) are maintained for at least three years.

Conditionally Exempt Hazardous Wastes

Used X-Ray Fixer Solution

- ✓ Used x-ray fixer solution is:
 - Sent to a silver recovery facility that is authorized to accept and recycle this waste in the receiving state; or
 - Sent off-site for recycling using a permitted hazardous waste transporter; or
 - Reclaimed on-site using a silver recovery unit (see Note below); or
 - Recycled through a municipal hazardous waste collection program.

Lead Foils, Shields, and Aprons

- ✓ Lead foils, shields, and aprons are sent for recycling and are not disposed of in the regular trash or red biohazard bags.

Staff Training/Recordkeeping

- ✓ Facility staff is informed about procedures for handling waste amalgam, and at least one employee is familiar with procedures for operating and maintaining the installed amalgam separator.
- ✓ Records are kept to document that the Dental Best Management Practices are met.

DENTAL BEST MANAGEMENT PRACTICES CERTIFICATION FORM

Due January 31, 2009

Under Vermont law, dental offices are required to follow environmental best management practices developed by the Vermont Department of Environmental Conservation. **One form should be submitted for each practice location.** All dental offices are required to install amalgam separators, except for orthodontists, periodontists, endodontists; oral and maxillofacial surgeons; and any other dental practice that does not place or remove amalgam. This certification form is not required for orthodontists, periodontists, endodontists and oral and maxillofacial surgeons.

- This certification form, must be completed every other year on odd years (2009, 2011, 2013)
- Refer to *Vermont Dental Best Management Practices* (enclosed) and complete Parts 1-3 of this form
- These forms and additional resources are available on line at www.mercvt.org/dental
- If you need assistance in completing the form or complying with Best Management Practices, please contact the Environmental Assistance Office at 800-974-9559 (press 1).
- A signed and completed certification form should be mailed to the following address:

*Vermont Dept. of Environmental Conservation, Environmental Assistance Office
103 South Main Street, Cannery Building, Waterbury, VT 05671-4911*

PART 1: DENTAL PRACTICE INFORMATION

Dental Practice Name _____

Mailing Address _____

City/Town _____ State _____ Zip _____

Type of Practice _____

Physical Location(s) if different than mailing address: _____

Check each box that applies:

At this practice location: Amalgam is placed Amalgam is removed

PART 2: AMALGAM SEPARATORS

This practice has installed an amalgam separator to service all of its dental chairs where amalgam is placed or removed and follows the Best Management Practices for amalgam separators.

YES NO Not Applicable

This practice discharges wastewater to: Municipal sewer Septic system

Provide the name of the manufacturer and model of the amalgam separator(s) installed.

Manufacturer Name: _____

Model: _____

Note: Amalgam separators must be certified to the ISO 11143 standard for amalgam separators. The Dept. of Environmental Conservation maintains a list of certified amalgam separators on its web site: www.mercvt.org

PART 3: PRACTICE CERTIFICATION

Please check ONE of the following boxes:

This practice complies with all applicable Vermont DEC Dental Best Management Practices.

This practice complies with the Vermont DEC Dental Best Management Practices except for the following: *(must complete exception below)*

Exception:

Corrective Action to be Taken:

I have personally examined and am familiar with the information in this submittal, which is to the best of my knowledge, true, accurate, and complete. I am fully authorized to make this certification on behalf of this practice, which agrees to maintain records for at least three years to document that program requirements are being met.

Name of Individual Making Certification (Print)

Signature

Title

Date

MAIL COMPLETED FORM TO:

**Vermont Dept. of Environmental Conservation, Environmental Assistance Office
103 South Main Street, Cannery Building, Waterbury, VT 05671-4911**