



**SPRINGFIELD WATER
AND SEWER COMMISSION**

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Springfield, Massachusetts
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November 15, 2018

RE: USEPA Requirements for Dental Dischargers

Dear Dental Practice:

The Springfield Water and Sewer Commission's Industrial Pretreatment Program (IPP) is contacting dental facilities within the Commission's wastewater jurisdiction to notify them of new Federal Regulations pertaining to the discharge of dental amalgam process wastewater to Publicly Owned Treatment Works (POTW), **40 CFR Part 441, Effluent Limitations Guidelines and Standards for the Dental Category**. The regulations became effective on July 14, 2017 and were promulgated by the Environmental Protection Agency (USEPA). A copy of the USEPA Dental Category regulation is enclosed.

As part of these new regulatory requirements, dental facilities which place or remove dental amalgam are required to implement a number of practices to keep dental amalgam out of discharges to Publicly Owned Treatment Works (POTW). Enclosed materials include:

-SWSC One-Time Compliance Report for Dental Dischargers

-40 CFR Part 441 Dental Office Point Source Category:

- Dates,
- Applicability,
- General definitions,
- Pretreatment standards for existing sources,
- Pretreatment standards for new sources,
- Reporting and record keeping requirements.

-SWSC Industrial Pretreatment Program – General Summary

After a dental facility has installed required equipment and implemented practices, authorized personnel must fill out, sign, and certify compliance with program requirements. This One-Time Compliance Report is to be sent to the Springfield Water and Sewer Commission (SWSC) Industrial Pretreatment Program by EPA's compliance deadlines as follows:

Existing Dental Facilities which must comply with 40 CFR Part 441 must do so by July 14, 2020, including but not limited to submittal of the One-Time Compliance Report to SWSC Industrial Pretreatment Program. See §441.30.

New Dental Facilities after July 14, 2017 must comply with 40 CFR Part 441 immediately for all discharges, and must submit the One-Time Compliance Report within 90 days of the beginning of operation to SWSC Industrial Pretreatment Program in addition to other requirements. See §441.40.

Transfer of ownership notification is required within 90 days of the transfer, including but not limited to submittal of a One-Time Compliance Report to SWSC Industrial Pretreatment Program. See §441.50 (a)(4).

For more information on the Dental Discharger program requirements refer to the Federal Register. The Dental Discharger is responsible to comply with the most recent version of the 40 CFR Part 441 published in the Federal Register:

<https://www.federalregister.gov/documents/2017/06/14/2017-12338/effluent-limitations-guidelines-and-standards-for-the-dental-category>

The requirements described here are in addition to the Massachusetts Department of Environmental Protection (MassDEP) requirements for Dental Amalgam/Mercury Recycling, (310 CMR 73.00: Amalgam Wastewater & Recycling for Dental Facilities). For information on MassDEP's program refer to:

<https://www.mass.gov/files/documents/2016/09/tx/310cmr73.pdf>
<https://www.mass.gov/guides/massdep-dental-amalgammercury-recycling-program>

Please note: The internet links to the most recent regulations are subject to change by EPA or MassDEP without notice.

The Springfield Water and Sewer Commission (SWSC) is authorized to enforce the Industrial Pretreatment Program required under the Code of Federal Regulations, Title 40, Part 403.8, through Massachusetts General Law Chapter 392 of the Acts of 1985 (as amended), the SWSC's Rules and Regulation, and the inter-municipal treatment agreements with municipalities that discharge wastewater to the Springfield Water and Sewer Commission's Regional Wastewater Treatment Facility.

The purpose of the Industrial Pretreatment Program (IPP) is to protect the Regional Wastewater Treatment Facility from the impact of potentially harmful non-domestic wastewater discharges. The SWSC delegated authority to control all non-domestic

wastewater discharges to the Industrial Pretreatment Program. As the local control authority, the IPP is authorized to survey and impact non-domestic wastewater sources, and determine the impact of wastewater discharges to the wastewater treatment facility.

If you have any questions regarding this matter, please contact Robert Weaver at 413-310-3449 or Georganne Hoyman at 413-452-1377.

Sincerely,
Springfield Water and Sewer Commission

By: _____
Robert Weaver
Emergency Response, IPP, and FOG Manager

Enclosures: SWSC IPP One-Time Compliance Report

40 CFR Part 441 – Dental Office Point Source Category

SWSC Industrial Pretreatment Program - General Summary