

Regulatory Compliance

AMALGAM WASTE BEST MANAGEMENT PRACTICES

Regulatory agencies are reaching out to the dental community to encourage the reduction of amalgam and mercury in the wastestream. Communities in the San Francisco Bay area, Sacramento, and Los Angeles County have seen educational outreach programs and, in some cases, regulatory programs. Amalgam waste is easily captured and can be recycled. Recycling is the preferred method of managing this waste. CDA encourages members to follow these best management practices for amalgam waste.

- ▶ Do not rinse amalgam-containing traps, filters, or containers in the sink.*
- ▶ Do not place amalgam, elemental mercury, broken or unusable amalgam capsules, extracted teeth with amalgam, or amalgam-containing traps and filters with medical "red-bag" waste or regular solid waste.*
- ▶ Recycle, or manage as hazardous waste, amalgam, elemental mercury, broken or unusable amalgam capsules, extracted teeth with amalgam, amalgam-containing waste from traps and filters. Empty dental amalgam capsules containing no visible materials may be disposed of as a non-hazardous waste, except as required by local regulations.*
- ▶ Collect and store dry dental amalgam waste in a designated, airtight container. Amalgam, which is designated for recycling, should be labeled "Scrap Dental Amalgam" with the name, address and phone number of your office and the date on which you first started collecting material in the container. In the past, dental amalgam scrap may have been kept under photographic fixer, water or other liquid. If you should encounter amalgam stored in this manner, do not under any circumstances decant the liquid down the drain and discontinue this practice in the future.*
- ▶ Keep a log of your generation and disposal of scrap amalgam; inspectors may ask to see this to verify that your office is managing it correctly. A generation and disposal log is a record of what you placed in the amalgam container, when it was placed in the container and when the container was picked up by or sent to a recycler or hazardous waste hauler.
- ▶ Check with your amalgam recycler for any additional requirements. Some recyclers do not accept contact amalgam (amalgam that has been in the patient's mouth); others may require disinfecting the amalgam waste. All recyclers have very specific packaging requirements.
- ▶ Separate excess contact dental amalgam from gauze that is retrieved during placement and place in an appropriate container.
- ▶ Use chair side traps to capture dental amalgam.
- ▶ Change or clean, chair side traps frequently. Flush the vacuum system before changing the chair side trap.

- ▶ Change vacuum pump filters and screens at least monthly or as directed by the manufacturer.
- ▶ Check the p-trap under your sink for the presence of any amalgam-containing waste.
- ▶ Eliminate all use of bulk elemental mercury and use only precapsulated dental amalgam for amalgam restorations.
- ▶ Limit the amount of amalgam triturated to the closest amount necessary for the restoration, i.e. do not mix two spills when one spill would suffice. Keep a variety of amalgam capsule sizes on hand to ensure almost all triturated amalgam is used.
- ▶ Train staff that handle or may handle mercury-containing material in its proper use and disposal.
- ▶ Install an amalgam separator compliant with ISO 11143.
- ▶ Do not use bleach to clean discharge systems as this may mobilize legacy mercury and amalgam in the system.

**Mandatory per California Code of Regulations Title 22
Publicly Owned Treatment Works (POTWs) may choose to make some BMPs mandatory.*

Information Resources

American Dental Association summary of "An assessment of mercury in the form of amalgam in dental wastewater in the United States," *Water, Air and Soil Pollution*, 2005 June;164(1-4):349-66.
http://ada.org/prof/resources/topics/topics_amalgamwaste_summary.pdf

ADA Professional Product Review, Fall 2007, Amalgam Separators,
http://ada.org/prof/resources/topics/amalgam_separators_ppr.pdf

California Dental Association Issue Summary, *Dental Amalgam: Public Health and the Environment*, February 2005, <http://www.cda.org/page/Amalgam: Public Health & the Environment>

Directory of Amalgam Recyclers – compiled by the ADA
http://ada.org/prof/resources/topics/topics_amalrecyclers.pdf

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