

Environmental Regulations and Dental Offices

It's important for you to be aware of Ohio EPA's rules that apply to your dental office. Dental offices are subject to certain environmental rules because they generate infectious and hazardous wastes. Wastewater discharges from dental offices are also regulated.

Is your office in compliance? Ohio EPA's Division of Environmental and Financial Assistance developed this compliance screening checklist to help you do a quick check on your compliance. This will help you identify areas where you may have compliance issues or opportunities to make other improvements.

If your answer corresponds to a YES or NO that is in **BOLD**, you may have a violation and need to take steps to get into compliance. A short description following each question will help identify action items for you to correct problems. The resource section at the end of the checklist provides additional information to help you with your compliance requirements.



Important:

This checklist highlights some of the major environmental requirements that might apply to a small dental office. It does not cover every requirement, and should not be used as your only source of information on environmental regulations. The referenced checklist and additional resources in this publication are intended to be a starting point for you to identify applicable regulations and areas where you can improve compliance.

Compliance Screening Checklist

If the answer you select is in shaded and **BOLD**, you have a compliance issue or have identified an area where additional steps can help improve your operations. When answering questions, make sure you know exactly how wastes are being managed. Do not assume anything. The more accurate you are in your responses, the more helpful this tool is in identifying problem areas.

Amalgam and Other Mercury

- Do you have chair-side traps, vacuum screens or separators to capture amalgam? YES **NO**

Due to its mercury content, amalgam should be captured and separated out from sink water. We recommend you equip your office with chair-side traps and/or vacuum screens. Unless a dental practice is a mobile unit or serviced by a combined waste treatment facility, amalgam separators or equivalent devices are required to be installed if the dental office places or removes mercury amalgam.
- If you are collecting amalgam, do you put it in with your infectious waste or into your trash? **YES** NO N/A

Because of its mercury content, waste amalgam is a hazardous waste. You cannot put hazardous waste in with infectious waste or in your regular trash. Hazardous wastes must be sent to a recycler or to a permitted hazardous waste disposal facility. See resource section for links to mercury recyclers and hazardous waste disposal facilities.

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3. Do you have any other mercury in your office? (for example, mercury-containing equipment or elemental mercury) YES NO

Consider removing all mercury from your office. Spills can happen when equipment malfunctions or breaks, leading to a dangerous situation and expensive clean up. Replace equipment and instruments with non-mercury equipment.

Ohio EPA maintains a [list of mercury recyclers](#) on their web page.

Discharges to Your Municipal Wastewater Treatment Plant

4. Are you discharging wastewater from your dental office to your local wastewater treatment plant? YES NO

Local wastewater treatment plants are also referred to as Publicly Owned Treatment Systems, or POTWs.

5. If you answered **Yes** to question 4, have you notified the POTW that you are operating a dental practice? YES NO N/A

Make sure you've contacted the POTW to get permission to discharge your wastes to them. You will need to provide your office location and information on the wastes going down your sinks and drains. Make sure you are complying with all the POTW's discharge requirements. Most POTWs have limits on what businesses can discharge. Many even have mercury limits, so it's important they know who is discharging to them. Ohio EPA has a [list of POTWs with approved pretreatment programs](#). If your area is not on the list, call your local utilities department to get contact information for your POTW.

6. If you answered Yes to question 4, have you completed and submitted your One Time Compliance (OTC) report? YES NO N/A

Dental offices that are connected to a POTW need to complete a OTC report and submit it to either their POTW or the Ohio EPA. The report is located at epa.ohio.gov/dsw/pretreatment/index.aspx.

7. If you answered Yes to question 4 and place and/or remove dental amalgam, do you have an amalgam separator or equivalent device installed at your dental practice? YES NO N/A

Dental offices that place and/or remove dental amalgam that discharge to a POTW must install and maintain an amalgam separator or equivalent device that meets ANSI Specification 108 with technical addendum or ISO 11143 specifications as outlined in the [Implementation of Dental Amalgam Standard \(40 CFR 441\) in Ohio fact sheet](#).

8. Do you dispose of any chemicals down the drain, such as photo and x-ray chemicals, sterilants or disinfectants? YES NO N/A

POTWs are designed to handle sanitary (restroom) wastes and not chemical wastes. Many POTWs do not want chemicals put down the drain because they can kill helpful bacteria at their plant or cause other hazards, such as an explosion or fire hazard. Make sure you have informed your POTW about the chemicals that are going down your drain to see if this practice is acceptable. Periodically check in with your POTW to ensure that their procedures or policies on what you can discharge have not changed.

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If you are not authorized to dispose of these chemicals down the drain, you need to evaluate and properly dispose of them. If they are hazardous wastes, you need to send them to a recycler or permitted hazardous waste disposal facility.

9. Do you rinse amalgam from cleaning chair-side traps, vacuum screens or an amalgam separator down the drain? YES NO N/A

Discontinue this practice. Amalgam containing mercury is a hazardous waste. Remove collected amalgam from traps, screens and separators and make sure it is properly managed according to Ohio's [hazardous waste rules](#).

Discharges to an On-Site Sewage Treatment or Disposal System (For Example, Septic Tank/Leach Field, Filtration System, Mound System)

10. Do you have an on-site sewage treatment or disposal system such as a septic tank/leach field, filtration system or mound system? YES NO

These systems must have a permit-to-install (PTI) from Ohio EPA's Division of Surface Water.

11. Does wastewater from chair-side sinks or rinse water from cleaning equipment go to your on-site system? YES NO N/A

Only sanitary (from restrooms and hand wash only sinks) can be discharged to your on-site system. Wastewater from chair-side sinks and equipment rinse water that comes in contact with amalgam cannot go into an on-site system.

12. Do you dispose of chemicals such as photo and x-ray chemicals, sterilants or disinfectants down the drain to your on-site system? YES NO N/A

Many of these waste chemicals may be classified as hazardous waste or industrial wastewater and cannot go into your on-site system.

13. Do you rinse amalgam from cleaning chair-side traps, vacuum screens or an amalgam separator down the drain to an on-site system? YES NO N/A

Discontinue this practice. Amalgam containing mercury is a hazardous waste. Collect amalgam and make sure it is properly managed according to Ohio's [hazardous waste rules](#).

Bottom line:

Only water from your bathrooms and sinks where only hand washing is done can go to an on-site sewage treatment or disposal system.

If you have wastewater containing amalgam or chemicals going into your on-site system, you must discontinue this practice. You must find another way to manage your wastewater such as installing a holding tank. Depending on the size, a holding tank may require a [permit-to-install \(PTI\)](#) from [Ohio EPA's Division of Surface Water](#). If you have chemicals or amalgam in your wastewater, your tank may also be regulated as a hazardous waste tank by [Ohio EPA's Division of Materials and Waste Management](#).

If you want to install a holding tank, keep amalgam and waste chemicals out of the tank and stored in separate containers. When you are ready to discard amalgam and chemicals, you must evaluate these and properly manage any hazardous wastes, including shipping them to a [permitted hazardous waste disposal facility](#). You'll need to contact a hauler to empty your holding tank. The wastewater must be [evaluated](#) and delivered to a commercial wastewater treatment facility or, if hazardous waste, a [hazardous waste disposal facility](#).

Contact your [local district office](#), [Division of Surface Water](#) and [Division of Materials and Waste Management](#) to discuss your options and requirements for installing a holding tank.

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Infectious Waste

Small infectious waste generator: A generator who produces **less than 50 pounds** of infectious waste in any month.
Large infectious waste generator: A generator who produces **50 pounds or more** of infectious waste in any month.

Small generators need to check with their local waste haulers, landfill operator and PUCO for the requirements for proper transportation of your infectious wastes. **If you are a small infectious waste generator:**

14. Do you keep records of the infectious waste you generate? YES **NO** N/A

Small generators need to keep a written log which shows the amount (weight) of infectious waste generated each month. You aren't required to send this information to Ohio EPA, but do need to keep it on file at the business.

15. Do you put infectious waste sharps in an appropriate container? YES **NO** N/A

Small generators need to put discarded needles, syringes, scalpel blades and other sharps in a *sharps container*. The container must be in good condition, labeled, puncture and leak resistant with a tight-fitting cover. It also needs to be rigid and strong enough to withstand handling during transport (for example, it won't collapse or break open).

16. Are your sharps containers properly labeled? YES **NO** N/A

Your sharps containers must be labeled with the word "sharps" and the international bio hazard symbol. Even though state regulations allow for the disposal of untreated infectious waste into the solid waste stream by small generators, many solid waste haulers and landfill operators do not accept this type of waste. Transportation of infectious waste (hazardous material) is regulated by the **Public Utilities Commission of Ohio (PUCO)**. For more information regarding the transportation of infectious waste, please contact PUCO by telephone at (800) 686-PUCO (7826).

If you are a large infectious waste generator:

If you generate 50 pounds or more of infectious waste in a month, you must **register with Ohio EPA as a large infectious waste generator**. Large generators cannot put untreated infectious waste in their dumpster. They must ensure that the waste is properly treated either on-site, or shipped off-site to a licensed infectious waste treatment facility. Once rendered non-infectious through treatment, wastes can be disposed of at a licensed solid waste disposal facility. **Additional requirements for large generators** include using a registered transporter, completing shipping papers, developing spill containment/clean up procedures and recording spills in a log.

Hazardous Wastes

17. Have you **evaluated** all the waste streams from your dental office to determine whether any are classified as **hazardous waste** under Ohio EPA's regulations? YES **NO**

Please note, this means everything you throw away.

Hazardous waste from dental offices may include:

- amalgam containing mercury;
- used fixer and developer;
- cleaners for x-ray developer;
- lead foil, shields, aprons;
- used chemical sterilants; and
- fluorescent bulbs and batteries.

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18. If you are generating hazardous waste, do you know your *generator category* and whether you are in compliance with the specific requirements for that category? YES NO N/A
19. Are all your hazardous wastes being sent to a *permitted hazardous waste disposal facility*? YES NO N/A
- Hazardous waste generators must send their hazardous waste to a *permitted hazardous waste treatment, storage or disposal (TSD) facility*.
20. Do you put used fluorescent bulbs and/or batteries in the trash? YES NO
- Fluorescent bulbs and batteries are usually hazardous for heavy metals. Ohio EPA recommends managing bulbs and batteries under the *universal waste rules*. If not managed under the universal waste rules, they must be evaluated and, if hazardous, properly disposed of at a *permitted hazardous waste disposal facility*.
21. Do you put any chemicals in the trash, such as old photo or x-ray chemicals, formacresol or methacrylate? YES NO
- Old photo/x-ray chemicals are usually hazardous because of the silver they contain. Formacresol and methacrylate are likely hazardous because of ignitability. You must *evaluate* these and, if hazardous, recycle or dispose of them as hazardous waste.
22. Do you put x-ray shields, foils or aprons in the trash? YES NO
- These materials are likely hazardous waste because of their lead content. You must recycle or dispose of them as hazardous waste.
23. Do you put vacuum filters in the trash? YES NO
- These filters may have enough mercury from amalgam to make them hazardous waste. You must evaluate filters and, if hazardous, recycle or dispose of them as hazardous waste.
24. Do you put electronics such as computers in the trash? YES NO
- Old electronic equipment may be hazardous waste because of heavy metals in components (lead, cadmium, chrome, for example). *Recycling electronic equipment* is a better option.

Bottom Line:

You are responsible for *evaluating* all wastes you generate to determine whether they are hazardous wastes and for ensuring proper disposal of these. **DO NOT** throw any waste into the trash if you have not evaluated it and confirmed that it is non-hazardous. Even if non-hazardous, you can't put liquids in your solid waste dumpster for disposal, as landfills aren't permitted to accept liquid wastes.

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Additional Resources

Guidance Document for Small Generators of Infectious Waste (Ohio EPA)
(For generators of less than 50 pounds of infectious waste in a month)
epa.ohio.gov/portals/34/document/guidance/gd_075.pdf

Guidance Document for Large Generators of Infectious Waste (Ohio EPA)
(For generators of 50 pounds or more of infectious waste in a month)
epa.ohio.gov/portals/34/document/guidance/gd_078.pdf

Identifying Your Hazardous Waste (Ohio EPA)
epa.ohio.gov/portals/41/sb/publications/identifyingwaste.pdf

Implementation of Dental Amalgam Standard (40 CFR 441) in Ohio (Ohio EPA)
epa.ohio.gov/Portals/35/pretreatment/AmalgamFactSheet.pdf

List of Commercial Facilities Accepting Hazardous Waste (Ohio EPA)
<http://epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp?category=29>

List of POTWs with Approved Pretreatment Programs (Ohio EPA)
epa.ohio.gov/Portals/35/pretreatment/Approved_Program_Contacts.xls

List of Computer, Fluorescent Lamp and Ballast Recyclers (Ohio EPA)
<http://epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp?category=7>

List of Battery Recyclers (Ohio EPA)
<http://epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp?category=5>

Ohio EPA, Division of Surface Water, Permit-to-Install Web Site for Holding Tanks
epa.ohio.gov/dsw/pti/HoldingTanks.aspx

Ohio EPA, Division of Materials and Waste Management, Infectious Waste Program
epa.ohio.gov/dmwm/Home/InfectiousWaste.aspx

Ohio EPA, Office of Compliance Assistance and Pollution Prevention (OCAPP)
epa.ohio.gov/ocapp

Need more help?

Environmental compliance can be challenging, especially for small dental offices, but we are here to help you get in and stay in compliance. If you identify areas where you need to take steps to achieve compliance, our **Office of Compliance Assistance and Pollution Prevention** (OCAPP) is ready to assist you. OCAPP is an independent office within Ohio EPA, established with a goal of providing confidential information and resources to help businesses achieve compliance with Ohio's environmental regulations. In addition, we can help you identify ways to reduce waste and possibly save money. For more information about OCAPP's services, see the resource section and our [website](#).