



Metropolitan Sewerage District

OF BUNCOMBE COUNTY, NORTH CAROLINA

November 10, 2017

Dental Offices in the
Metropolitan Sewerage District

Re: **Title 40 of the Code of Federal Regulations Part 441 Dental Category Compliance**

Dear Owner or Manager:

The Metropolitan Sewerage District of Buncombe County (MSD) is reaching out to its existing dental facility customers to inform them of EPA's new dental amalgam regulation promulgated July 14, 2017, on wastewater discharged from dental facilities. Federal pretreatment regulations, such as these, are self-implementing, which means that the **discharger** is responsible for compliance even if it has not been notified of the regulation.

The rule requires dental offices that place and/or remove amalgam to:

- a) install an amalgam separator;
- b) implement two Best Management Practices (BMPs);
- c) submit a One-Time Compliance Report to MSD;
- d) conduct on-going operation and maintenance of the amalgam separator;
- e) maintain associated documentation and records.

It is our understanding that there is not an all-encompassing method for delivery of such notification within the dental community, so MSD would like to ensure that its customers were aware of the requirements well before the final compliance date. Included with this letter is a fact sheet and a One-Time Compliance Report. The fact sheet summarizes the requirements and compliance dates found in the regulation and where to read it online. The One-Time Compliance Report requests all information required by the EPA. The Authorized Representative of the facility must sign the report. An Authorized Representative is a person who is responsible for principle business decisions or other policy decisions for the facility. For example, it can be an owner, president, vice-president, but not an administrative assistant. The report must be submitted to MSD and a copy of it maintained at the facility as long as the dental practice is in operation or until ownership is transferred.

If you are currently compliant with the rule, please complete and return the One-Time Compliance Report in a timely manner. If you are not yet fully compliant with the rule, the deadline for compliance is October 12, 2020.

Please note you must come into compliance immediately if you are a new dental user or are remodeling your facility or adding additional space/chairs. You must comply with the rule and submit a compliance report within 90 days of transfer of ownership.

~Protecting Our Natural Resources~

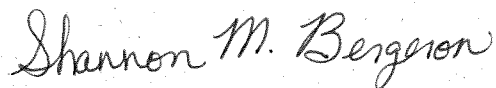
Return the completed One-Time Compliance Report by October 12, 2020 to the following address:

MSD
Attn: Shannon Bergeron
2028 Riverside Drive
Asheville, NC 28804

Or by email at sbergeron@msdbc.org

Please read the fact sheet closely as it offers a synopsis of the regulation and contains applicable conditions and deadlines. The fact sheet also contains provisions for exemptions from the rule for certain dental practices that do not place or remove amalgam on a regular basis. If you have any questions or concerns while completing the One Time Compliance Report, please contact me at (828) 225-8230. Thank you in advance for your cooperation and assistance in this matter.

Sincerely,



Shannon M. Bergeron
Industrial Pretreatment Coordinator

Enclosures: 40 CFR Part 441 Fact Sheet and One Time Compliance Report