


SAN FRANCISCO PUBLIC UTILITIES COMMISSION

BERM - 3201 Third Street, Suite 600, San Francisco, CA 94124 • Tel. (415) 695-7310 • Fax (415) 695-7368



August 27, 2003

SZE ALEXANDER JOHN
450 SUTTER STREET STE 2012
SAN FRANCISCO, CA 94108

 Subject: *Dental Mercury Reduction Program - Introductory Information*
NOTE ➔ RESPONSE REQUIRED – Response Form Attached

Dear Dr. SZE ALEXANDER JOHN:

This letter has been sent to you from the San Francisco Public Utilities Commission (SF PUC), Water Pollution Prevention Program in order to provide your offices with information on a new dental mercury reduction program. This program is being implemented in order to reduce sources of new mercury being discharged into the Bay

The City of San Francisco has developed this dental mercury reduction program with input from the California Dental Association and the San Francisco Dental Society. This letter provides you with a basic overview of what this program will mean to you, the actions you will need to take, what options you will have, and the materials you will be receiving at the end of September.

How Will This Program Affect Dental Practitioners?

- Dental offices that are connected to the City and County of San Francisco's (City's) sanitary sewer system will soon be required to reduce their discharge of dental amalgam wastes to the lowest practicable level.
- These offices will be required to obtain a wastewater discharge permit by the end of 2003. A permit package will be mailed to your office in late September.

Why Is This Program Being Launched?

- San Francisco's Southeast Water Pollution Control Plant has a discharge permit issued to it by the State that limits how much mercury, silver, and other pollutants can be released to the Bay. The allowable discharge level for mercury has been reduced in the latest permit revision of June 2002. In addition, the permit specifically requires an aggressive mercury source reduction program.
- Historical data from this plant shows that discharges have exceeded the current allowable discharge limit for mercury of 87 ng/L. at least 6 times during the past 5 years.
- Dental practices are one of the controllable sources of mercury in the City's sewage collection systems.
- Beneficial uses of San Francisco Bay are impaired due to high mercury levels in fish.

 WILLIE L. BROWN, JR.
 MAYOR

 E. DENNIS NORMANDY
 PRESIDENT
 ASHOK KUMAR BHATT
 VICE PRESIDENT
 ANN MOLLER CAEN
 JEFFREY CHEN
 ROBERT J. COSTELLO

 PATRICIA E. MARTEL
 GENERAL MANAGER

- For the past decade San Francisco has performed education and outreach to encourage dentists to voluntarily implement a series of dental amalgam best management practices (BMPs) to reduce introduction of amalgam particles to the sewer system and the environment. However, more action is needed because these voluntary measures alone have not produced a sufficient reduction of mercury in the sewer system.

What Will Be Required of Dental Offices?

- All dental offices will be required to implement the eleven Best Management Practices listed in the attachment to this letter.
- Dental offices must choose one of the two options below to demonstrate compliance with the permit requirements:
 - OPTION 1:** Install an approved amalgam separator device⁵⁴ on its vacuum system, in addition to implementing all required Best Management Practices; or
 - OPTION 2:** Self-monitor discharges (i.e., collect samples of the dental practice's wastewater to demonstrate that the office wastewater discharge contains less than 0.05 mg/L of total mercury), in addition to implementing all required Best Management Practices.
- Dental practices that place or remove amalgam fillings 3 days or fewer in a calendar year, and which generate minimal amalgam waste, may be exempt from the permit process. The determination as to whether or not a practice qualifies for an exemption will be made after the permit application information has been submitted and reviewed.
- There is no permit fee required to obtain this wastewater discharge permit.

When Will This Go Into Effect?

The permitting process requires time, planning, and budgeting. Therefore, the City does not expect dental practices that install amalgam separators or otherwise prove they meet local discharge limits to complete the new requirements until the dates indicated below:

- By September 30, 2003 a permit package will be mailed to dental offices.
- By December 31, 2003 all existing dental practices must have submitted a permit application that declares which option they intend to implement to be in compliance.

IF OPTION 1 IS SELECTED ↓

- ❖ Install an amalgam separator by July 1, 2004.
- ❖ A one time extension of up to 6 months may be granted with a written justification.
- ❖ If an extension is granted, offices must be in compliance by January 1, 2005.

IF OPTION 2 IS SELECTED ↓

- ❖ Within 90 days of receipt of permit, offices will be visited to determine the sampling point of compliance.
- ❖ Sampling and analysis must begin within 30 days of this office visit.

- After July 1, 2004, staff from the City will begin inspecting dental offices to see that they meet their permit requirements.
- **New Offices:** Note that after January 1, 2004, all *new* dental offices must submit a permit application and a Best Management Practices Plan/Certificate *before* opening for business.

⁵⁴ Watch for information on a cash rebate program for early installers in the permit application package you will receive in the near future.

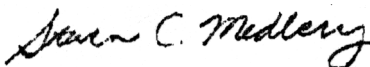
What Do Dental Offices Need To Do Right Now?

Return the attached Response Form BY FRIDAY, SEPTEMBER 12TH

- By returning this form promptly, you can help ensure that your office will have the information it needs to be in compliance with the wastewater permit requirements. The addressee and office location used in mailing this letter reflect the current information our office has on file. This information will be used to mail out the permit package and for inspection purposes – unless updated information is provided.
- If the current information we have on file is correct, please confirm this by returning the attached Response Form with the appropriate box checked.
- 2. All dental practices should begin to implement the attached Best Management Practices immediately if they are not already doing so.
- 3. Identify the person in your office who will be responsible for responding to the permit application package your office will receive at the end of September.
 - This package will include:
 - a permit application with instructions;
 - information on selecting, purchasing, installing and maintaining an amalgam separator;
 - details on the self-monitoring option; and
 - information on training workshops that will be held to provide you with the program details and support you will need.
- 4. Consider attending the Vendor Expo on October 9, 2003 – refer to the enclosed flyer for details. This Expo will give you the opportunity to interact with amalgam separator vendors and with City inspectors.

We look forward to working with your office on this important new program. Should you have any questions before you receive your permit application package in late September, please call Gary Ong/415-695-7365.

Sincerely



Steven C. Medbery
Bureau Manager
SF Public Utilities Commission
Bureau of Environmental Regulation and Management

ATTACHMENTS INCLUDED:

- Response Form (Required)
 - Amalgam Waste Management Vendor Expo Flyer
 - Required Best Management Practices
-



WATER
 HETCH HETCHY
 WATER & POWER
 CLEAN WATER

WILLIE L. BROWN, JR.
 MAYOR

E. DENNIS NORMANOV
 PRESIDENT
 ASHOK KUMAR BHATT
 VICE PRESIDENT
 JOE MOLLER CAEN
 ROBERT CHEN
 ROBERT J. COSTELLO

PATRICIA E. MARTEL
 GENERAL MANAGER

SAN FRANCISCO PUBLIC UTILITIES COMMISSION
 BERM - 3801 Third Street, Suite 600, San Francisco, CA 94124 • Tel: (415) 695-7310 • Fax: (415) 695-7388



MANDATORY BEST MANAGEMENT PRACTICES (BMPs)

To Minimize Amalgam in Wastewater Discharges

1. Eliminate all use of bulk elemental mercury (also referred to as liquid or raw mercury). Use only preencapsulated dental amalgam. Any bulk elemental mercury must be recycled or disposed of as hazardous waste. *It must NEVER be placed in the regular trash, placed with infectious waste (red bag), or poured down the drain.*
2. Limit the amount of amalgam used to the smallest appropriate size for each restoration. Keep a variety of amalgam capsule sizes on hand to more closely match the amount triturated to the amount needed in the restoration.
3. Install plastic disposable chair-side amalgam traps in both the vacuum system and cuspidor of each operatory where restoration work is done. Change these chair-side amalgam traps frequently. Never rinse traps in the sink.
4. Refrain from using sodium hypochlorite (bleach) to disinfect vacuum lines, because it speeds the release of mercury from amalgam.
5. Change vacuum pump filters and screens at least once per month or as directed by the manufacturer. Carefully seal the vacuum screen in its plastic container, including any water that may be present, and store it in an air-tight container with other amalgam waste.
6. If your practice has a dry turbine vacuum unit, then have a licensed amalgam recycler or hazardous waste disposal service pump out and clean the air-water separator tank at least once per six months. Perform this service more frequently if necessary to maintain suction or if so directed by the vacuum system manufacturer.
7. Have a licensed recycling contractor, mail-in service, or hazardous waste hauler remove your amalgam wastes. Recycling is the preferred method for dealing with amalgam wastes. As an alternative, you may have a licensed hazardous waste hauler remove your amalgam waste for disposal. You may also transport small quantities yourself to the San Francisco Household Hazardous Waste Facility, using the VSQG ("Very Small Quantity Generator") program

Amalgam waste includes:

- a. Non-contact amalgam (scrap);
- b. Contact amalgam (e.g., extracted teeth containing amalgam);
- c. Amalgam or amalgam sludge captured by chair-side traps, vacuum pump filters, screens, and other devices, including the traps, filters, and screens themselves;
- d. Used amalgam capsules; and
- e. Leaking or unusable amalgam capsules.

-- over to continue --