


FROM	NAME & TITLE	Rudolph S. Chow, Director	CITY of BALTIMORE MEMO	
	AGENCY NAME & ADDRESS	Department of Public Works 600 Abel Wolman Municipal Building		
	SUBJECT	DIRECTIVE 19-1 DENTAL AMALGAM CERTIFICATION PROGRAM		

TO

DATE:

December 1, 2019

Bureau Heads & Division Chiefs

The Environmental Protection Agency (EPA) established Effluent Limitations Guidelines and Standards for the Dental Category (40 CFR Part 441) effective July 14, 2017. The rule applies to wastewater discharges to Baltimore's municipal sanitary sewerage system from dental facilities including dental schools and clinics, permanent or temporary offices, home offices, and dental facilities owned and operated by the military and federal, state, or local governments.

The EPA requires certain documentation to be submitted by dental facilities to the Control Authority for the Pretreatment Program. DPW is the Control Authority for the city's Pretreatment Program. Existing sources must comply with the standards by 7/14/2020 and submit a "one-time certification" by 10/12/2020. New sources must comply immediately, meaning that installations prior to 7/14/2017 are considered existing sources.

Legal authority for the Dental Amalgam Certification Program is in accordance with Article 25 of the Baltimore City Code, as amended, and state of Maryland and federal regulations. Federal General Pretreatment Regulations (40 CFR Part 403) require the development of inspection, compliance, and enforcement activities to protect worker safety and health, the wastewater conveyance and treatment systems as well as sludge and effluent quality.

Therefore, in accordance with Subtitle 1 of Article 25, I am directing the Pollution Control Section to incorporate the EPA Dental Office Category Rule (40 CFR 441) into permitting, compliance, and enforcement activities applicable to dental facilities that discharge or have the potential to discharge amalgam-bearing wastewater into the sanitary sewer.

This Dental Amalgam Certification Program (DACP) Policy directive clarifies DPW responsibilities and dental facilities' requirements not specified in the directive entitled Policy Decisions – Pretreatment Program dated April 16, 1986.

DPW responsibilities include:

1. Program development, implementation, and administration:
 - a. Develop program materials and forms;
 - b. Provide forms and outreach materials to dental facilities via the mail and the DPW website;
 - c. Create and maintain a database of dental facilities and track compliance certification submissions in Baltimore City;
2. Issue wastewater discharge permits to dental facilities that require separators and pay the associated annual fees.
3. Initiate necessary enforcement actions to correct violations.

Customer responsibilities include:

1. Compliance with Dental Amalgam Certification Program requirements:
 - a. Ensure the removal of dental amalgam solids from all amalgam process wastewater via amalgam separator(s) or equivalent device(s) that meet the standard of the final rule;
 - b. Implementation of two best management practices;
 - c. Comply with reporting requirements;
 - d. Maintain and make available for inspection certain records documenting compliance.
2. An existing source must submit a "One-Time Compliance Certification" to DPW by October 12, 2020;
3. A new source must submit a "One-Time Compliance Certification" to DPW within 90 days of the commencement of discharge.



Rudolph S. Chow, P.E.
Director

RSC/YK:PAB

cc: Mayor's Office
Honorable Board of Estimates
Comptroller's Office
Fire Department
Police Department
Department of Housing and Community Development
Department of Finance
Legislative Reference