

Amalgam Rule implementation in West Virginia

<http://www.wvdentalboard.org/>



**Bureau for Public Health-
Office of Environmental Health Services-
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Status

Out of 600 facilities only 5 facilities submitted one time compliance report. Of these, 2 do not place amalgam. 2 have installed amalgam separators in 2017, one installed in 2015 for 8 chairs.

We will need to find out identity of new dental facilities and facilities that transferred ownership during the last year. These facilities need to submit one time compliance report within 90 days.

We will mail notices to these facilities to comply or be designated as categorical industrial user subject to monitoring and reporting mercury in their effluent.

Similar notice will be mailed to other facilities once per year and more frequently as we get closer to the deadline for submitting one time compliance report.

Question: If a dental facility did not install an amalgam separator and ownership is transferred, will the new owner be required to submit one time compliance report within 90 days?

§441.50 Reporting and recordkeeping requirements.

(a) Dental Dischargers subject to this part must comply with the following reporting requirements in lieu of the otherwise applicable requirements in 40 CFR 403.12(b), (d), (e), and (g).

(1) *One-Time Compliance Report deadlines.* For existing sources, a One-Time Compliance Report must be submitted to the Control Authority no later than October 12, 2020, or 90 days after a transfer of ownership. For new sources, a One-Time Compliance Report must be submitted to the Control Authority no later than 90 days following the introduction of wastewater into a POTW.

From FAQ Office of Water EPA 822-S-17-002 November 2017

If the dental discharger transfers ownership, what are the deadlines for a new owner to submit a one-time compliance report? If an “existing source” dental discharger transfers ownership, the new owner must submit a new one-time compliance report to the Control Authority by October 12, 2020, or if the transfer occurs after July 15, 2020, no later than 90 days after the transfer.