



UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
BOSTON, MA 02109-3912

MEMORANDUM

SUBJECT: Questions on Dental Amalgam Rulemaking

DATE: February 3, 2020

FROM: Justin Pimpare
Regional Pretreatment Coordinator
EPA New England

TO: David Brandsen
Anterior Quest

This memorandum is in response to your inquiry on January 21, 2020. In that request, you provided three specific questions for EPA to respond to. After reviewing the questions, I have provided my response which can be found below as well as cited in EPA's Frequently Asked Questions on the Dental Office Category Rule document dated November 2017.

Question 1: Does the Anterior Quest containment system need to have an ISO certification?

Answer: No. See § 441.10(e). As long as the dental facility does not discharge any amalgam process wastewater from the tank or otherwise, it is not subject to any of the rule's requirements, including submission of a one-time compliance report to their Control Authority.

Question 2: Can an Anterior Quest containment system be used to keep a dental office compliant with the 2020 EPA mandate for amalgam separators?

Answer: Yes. See § 441.10(e). As long as the dental facility does not discharge any amalgam process wastewater from the tank or otherwise, it is not subject to any of the rule's requirements, including submission of a one-time compliance report to their Control Authority.

Question 3: If an office has a Anterior Quest containment system in place does the office also have to have a ISO certified device in addition to the Anterior Quest system?

Answer: No. As long as the dental facility does not discharge any amalgam process wastewater from the tank or otherwise, it is not subject to any of the rule's requirements, including submission of a one-time compliance report to their Control Authority. Therefore, an additional ISO certified device is NOT necessary if there is no discharge to the sewer system.

Please feel free to contact me at (617) 918-1531 if you have any comments or questions regarding the contents of this memorandum.

Sincerely,

A handwritten signature in black ink, appearing to read 'Justin Pimpore', written over the printed name.

Justin Pimpore
Regional Pretreatment Coordinator