

## **JOINT BASE LEWIS MCCHORD PERMIT REQUIRED MANAGEMENT PRACTICES WASTEWATER PRETREATMENT**

This permit required management practice (PRMP) is being issued instead of an individual permit. PRMPs are mandatory under the Clean Water Act (CWA) and promote compliance with the NPDES permit requirements for stormwater and pretreatment programs. The intent is to provide efficient and effective procedures that protect personnel, plant operations, groundwater, surface water, marine waters and prevent wastewater treatment plant pass through. When these PRMPs are followed properly, they are an effective means of source control which prevents potential pass through or 'slugs' of untreated pollutants from entering the sanitary sewer system or illicit discharges to the stormwater system.

### **DENTAL AMALGAM RECOVERY**

Dental amalgam is a durable filling material for teeth. This material contains a mixture of metals including silver, copper, and mercury, which are chemically bound into a hard and stable dental tooth filling.

If not controlled these compounds, particularly mercury can enter the environment through wastewater discharges and pose toxic risks to the environment. Most wastewater treatment facilities cannot remove all mercury from amalgam wastes.

Dentists limit the release of dental amalgam waste into the environment through waste handling and disposal practices that reduce mercury discharges, which include but are not limited to initiating bulk mercury collection programs, using chair side traps, installing amalgam separators, applying vacuum collection, inspecting and cleaning traps, and recycling or using a commercial waste disposal service to dispose of the amalgam collected.

#### **Things to do for Reducing Mercury Discharges:**

1. Use only pre-capsulated alloys or use composite fillings as an alternative to amalgam when applicable.
2. Use chair-side traps to retain amalgam and keep amalgam out of sinks.
3. Use non-bleach and non-chlorine cleaners which minimize dissolution of amalgam.
4. Periodically flush the drain lines from the chair side drains to the recovery system to prevent the build up of mercury in low spots and traps in the drain lines.
5. Appropriately disinfect extracted teeth that contain amalgam restorations, collect, and recycle extracted teeth with the chair-side trap.
6. Remove amalgam from any chair-side traps daily.
7. Collect scrap used and unused (non-contact) amalgam, disposable amalgam pieces from restorations, and used disposable amalgam capsules in pre-marked designated containers provided by Madigan Army Medical Center (MAMC) Logistics.
8. Contact MAMC Logistics at (253) 967-6768 to properly dispose of scrap amalgam.

9. If traps are disposable, put entire trap into a container labeled CONTACT AMALGAM and dispose of as hazardous waste.
10. If traps are reusable, gather amalgam contents and place into contact amalgam container for disposal as hazardous waste (or recycling).
11. For specific operating instructions, refer to Standard Operating Procedure for Amalgam Separators.

**Things not to do:**

1. Do not use heat, bleach or chlorine to disinfect amalgam or teeth or to clean vacuum lines containing amalgam, as these chemicals dissolve the amalgam and release mercury.
2. Do not use bulk mercury.
3. Do not pour, flush, or dispose of mercury or the following scrap amalgam in the garbage, drain, sink, toilet, hopper, red biohazard bag, or sharps containers:
  - Used disposable amalgam capsules;
  - Non-contact (unused) amalgam waste;
  - Contact amalgam waste; or
  - Extracted teeth that contain amalgam.
4. Do not rinse chair-side traps containing amalgam over drains, sinks, or toilets.

For additional pretreatment information, contact the Public Works Pretreatment Program at [usarmy.jblm.imcom-central.list.dpw-pretreatment@mail.mil](mailto:usarmy.jblm.imcom-central.list.dpw-pretreatment@mail.mil).

**NOTE:** All PRMPs are in the process of significant format and content update to meet multiple NPDES permit discharge requirements, JBLM 200-2 and JBLM 200-3.