



INSPECTING AND MAINTAINING SUCTION PUMP AMALGAM SEPARATORS

TECHNICAL INFORMATION PAPER No. 37-048-0116

PURPOSE.

This document recommends procedures for effective maintenance of suction pump amalgam separators.

POINTS OF MAJOR INTEREST AND FACTS.

What is Suction Pump Amalgam Separator Waste?

Dental clinics collect mercury-containing amalgam particles from rinse waters using chairside separators in the dental clinic and suction pump separators located in the facility utility room. Separator filters must be changed periodically. Used filters are managed either as a toxic hazardous waste or by recycling the mercury. This waste amalgam is “contact amalgam” because it has been in contact with the patient. The Defense Logistics Agency (Memo, DRMS-BCP, March 24, 2005, subject: Revised Procedures for the Management of Dental Amalgam) and some amalgam recyclers consider contact amalgam to be biohazardous and require it to be disinfected and contained at turn-in.

What Gaps Exist in Suction Pump Amalgam Separator Maintenance?

Dental personnel maintain chair-side separator filters but do not maintain suction pump separators because they lack the access to utility rooms and lack the skills and tools to remove and replace filters. The U.S. Army Medical Command (MEDCOM) and garrison facility maintenance personnel do not maintain suction pump filters because garrison/tenant support agreements omit the equipment and because of concerns about exposure to biohazards. MEDCOM Environmental funds pay for filter disposal but not for new or replacement separators, new filters, or the labor to inspect and maintain separators.

What are the Hazards from Failing to Maintain Suction Pump Amalgam Separators?

Because suction pump separators are not inspected and maintained, dental clinics are releasing toxic hazardous waste to wastewater collection and treatment systems. This

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release may violate existing Federal, state, and local environmental regulations. The Environmental Protection Agency intends to propose a rule that would require separator installation and monthly inspection and maintenance (70 Federal Register 204, October 22, 2014, Effluent Limitations Guidelines and Standards for the Dental Category). Mercury-containing amalgam that collects in the wastewater piping is a health hazard to personnel maintaining and repairing wastewater collection and treatment systems. Collecting and disposing of waste suction and rinse water at an average dental clinic would cost thousands of dollars a month.

What are the Recommendations to Maintain Suction Pump Amalgam Separators?

Assign the responsibility for inspecting and maintaining suction pump amalgam separators to MEDCOM government or contractor personnel with the necessary knowledge, skills, and training in biohazards and hazardous waste, or,

Negotiate with the garrison and if necessary fund updated support agreements for garrison personnel to inspect and maintain the suction pump amalgam separators.

Point of Contact

For more help, contact the APHC (Prov) Waste Management Program at 410-436-3651.

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