

September 24, 2010

Dr.
12808 Drexmore Road
Cleveland Ohio 44120

Re: *New Requirement: Installation of a Dental Amalgam Separator*

Dear Dr. :

The Northeast Ohio Regional Sewer District (“NEORSD”) owns and operates three wastewater treatment plants in the Cleveland area. These plants remove most pollutants from sewage before its discharge into the Cuyahoga River and Lake Erie. We are responsible for ensuring that any pollutants remaining in the treated wastewater do not exceed water quality criteria for protecting uses of the river and the lake.

The NEORSD recognizes that compliance with a mercury discharge prohibition would be infeasible. Therefore, we have instead instituted a requirement that all non-residential sources of mercury must implement Best Management Practices (“BMPs”) to *minimize* the amount of mercury-containing material discharged. Your office has already submitted a BMP plan and has been inspected in the past for compliance with the BMPs.

Starting November 1, 2010, installation of a dental amalgam separator will be one of the mandatory BMPs required by the NEORSD. Your office will have until November 1, 2011 (one year from the inception date) to install a separator with a 99% removal efficiency (as certified by the manufacturer) in order to comply with this requirement. You will also be required to maintain the separator according to the manufacturer’s recommendations.

Any amalgam separator installed prior to November 1, 2010, will be considered to have met the mandatory BMP. However, the replacement of an already existing separator after November 1, 2010 must meet the 99% removal efficiency requirement.

Upon notification of the installation of a separator that meets with the NEORSD’s requirements, an appointment for a spot check inspection will be made with your staff. The inspection will verify that the separator has been properly installed (with no bypass) and that you have documentation of a maintenance plan. If your system has a bypass installed, you are required to inform NEORSD any time that the bypass is used. For compliance to be maintained, flow must go through the amalgam separator.

The inspection does not have to be attended by the dentist: any staff member who can show the investigator the maintenance records and the location of the separator will be sufficient to attend.

As the local Pretreatment Program Control Authority, the NEORSD is required to perform facility visits that may occasionally be unannounced. The purpose of our visiting your facility is to work together with you to ensure that BMP implementation is as effective as possible. The NEORSD investigators will make every reasonable effort to minimize any disruption these visits may cause your practice. We recognize that preventing unnecessary inconvenience or discomfort to your patients and staff is of the utmost importance to you, and we greatly appreciate your cooperation to help us satisfy our regulatory and environmental obligations in a minimally intrusive manner.

The NEORSD, in cooperation with the Ohio Dental Association and the Greater Cleveland Dental Society, will hold free, two-hour Dental Amalgam Separator Seminars on October 18, October 29, and November 10. This seminar will provide information on the new requirement and an opportunity for dental care practitioners to ask questions and discuss their concerns. In addition, dental amalgam separator vendors will be present to answer questions about their products. On each date, the seminar will be held at the NEORSD Environmental & Maintenance Services Center located at 4747 East 49th Street in Cuyahoga Heights. Due to limited seating, RSVPs are **required** by October 13, 2010. If you would like to attend a Dental Amalgam Separator Seminar on October 18, October 29, or November 10, please e-mail mercuryprogram@neorsd.org or call Pat Lewis at 216-641-6000 extension 2230.

If you have questions regarding any of the enclosed materials, please call Kathryn Crestani, Elizabeth Toot-Levy, or myself at 216-641-6000 or e-mail mercuryprogram@neorsd.org

Sincerely,



Francis G. Foley
Superintendent of Environmental Services