

9441.1989(22)

SCRAP AMALGAM FILLINGS FROM DENTISTS, DISPOSAL OF

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 17 1989

Mrs. Phyllis A. Shay
3700 Petre Road
Springfield, OH 45502

Dear Mrs. Shay:

Thank you for your letter of April 7, 1989 to the Administrator. We understand your concerns about the disposal of scrap amalgam fillings from dentists in the United States and the health effects of amalgam on dental patients. We appreciate your bringing to our attention your personal experience with amalgam.

The Agency defines as hazardous any solid waste which has been listed as a hazardous waste or meets any of four hazardous characteristics; ignitability, corrosivity, reactivity, and extraction procedure (EP) toxicity. Dental amalgam contains mercury and silver. If discarded, dental amalgam can be a hazardous waste if mercury and silver are extracted by the EP test, and are present above certain concentrations. The maximum permitted concentration of mercury in the extract is 0.2 milligrams per liter (Mercury has been assigned EPA hazardous waste number D009.). The maximum permitted concentration of silver in the extract is 5.0 milligrams per liter (Silver has been assigned EPA hazardous waste number D011.).

The hazardous waste regulations (promulgated under the Resource Conservation and Recovery Act (RCRA)) also provided special, reduced regulations for generators of small quantities of hazardous waste. The regulations define "small quantity generator" as one generating less than 1,000 kg of hazardous waste in a month and "conditionally exempt small quantity generator" as one generating less than 100 kg of hazardous waste in a month. Most dentist would probably generate much

less than 100 kg (about 220 pounds) of dental amalgam a month and be classified as a conditionally exempt small quantity generator.

Thus, your concerns are about generators who are most likely exempt from the hazardous waste regulations. Some dentists presently send their unused and waste dental amalgam to scrap metal dealers for recycling. I suggest that you contact your local health department to see if they could coordinate with dentists to send amalgam to a central location or locations for recycling.

Sincerely,

Robert W. Dellinger
Chief
Waste Characterization Branch
Office of Solid Waste (OS-332)

cc: (AX)
Administrator's correspondence office
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