



Dental Offices and Clinics Fact Sheet

Dentistry is a prominent industry found widely across Hillsborough County. This fact sheet has been prepared to help dental practices understand the regulatory requirements for the safe management and disposal of typical hazardous wastes generated. This Fact Sheet is not intended to be a complete reference to all applicable regulations, and may not include all hazardous materials in the practice. The business owner is responsible for determining the quantity of hazardous waste generated each month, managing the hazardous waste while it is on site, and ensuring its proper disposal. It is also assumed that most dental facilities generate less than 220-lbs/100-kg of hazardous waste in any single calendar month and are categorized as a very small quantity generators of hazardous waste (VSQGs).

Amalgam Waste

Amalgam waste may not be disposed of in the trash or a biohazardous/infectious waste bag (e.g., “red bag”). This includes contact amalgam from extracted teeth, chair side traps, vacuum pump filters, and amalgam separators. It also includes non-contact amalgam left over from procedures.

Note that the installation of amalgam separators was required of all non-exempt practices by July 14, 2020, by the Environmental Protection Agency. Waste generated during maintenance and cleaning of these pollution control devices, including waste or spent amalgam cartridges and/or separator canisters, are subject to the hazardous waste rules. Practices that do not place or remove dental amalgam are exempt from requirements as long as they submit a one-time compliance report to their Control Authority.

All amalgam waste must be either reclaimed by a mercury reclamation facility or managed and disposed of as hazardous waste. Empty amalgam capsules can either be recycled or disposed of into the trash.

Lead Waste

Waste containing lead, including used foils, bite wings, and aprons, should be recycled. Otherwise these wastes must be managed and disposed of as hazardous waste.

Silver Waste

Some practices still produce conventional x-ray images on film, which generates spent fixer containing high levels of silver. Spent fixer can either be recycled on site, recycled off site, or disposed of as hazardous waste. Silver recycler units must be regularly maintained and as directed by the manufacturer. The treated fixer may be discharged into the sanitary sewer.

Pharmaceutical Waste

VSQGs are not required to follow 40 CFR 266 Subpart P, but are required to perform waste determinations on all waste pharmaceuticals to determine if they are listed in 40 CFR Part 261.33, or are characteristic for ignitability, corrosivity, toxicity, or reactivity. Additional information can be found on the Florida Department of Protection’s website at <https://floridadep.gov/waste/permitting-compliance-assistance/content/pharmaceutical-waste-management-businesses-and> and also EPA’s website at <https://www.epa.gov/hwgenerators/management-hazardous-waste-pharmaceuticals>.

If there are any questions about this fact sheet, or about waste management in general, please contact the Environmental Protection Commission of Hillsborough County at (813) 627-2600 and ask to speak with someone from the SQG Program.