



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

Ref: 8ENF-W-NW

SENT VIA EMAIL
READ RECEIPT REQUESTED

Dr. Dane Christensen
Fruita Family Dental
dane@fruitafamilydental.com

Re: Inspection Report for Fruita Family Dental, NPDES Identification No. COPD00001

Dear Dr. Christensen:

On April 13, 2022, representatives of the U.S. Environmental Protection Agency (EPA) inspected Fruita Family Dental located in Fruita, Colorado to evaluate compliance with the Dental Office Point Source Category (40 CFR Part 441). The inspection was conducted under the authority of Section 308 of the Clean Water Act (Act). Enclosed is a report of the inspection.

Inspection findings are summarized within the enclosed inspection report in a table titled "Findings, Corrective Actions and Recommendations." No additional correspondence to the EPA is needed at this time.

Please contact me at 303-312-6310 or ratajczak.kristin@epa.gov if you have any questions regarding this letter or the enclosed report.

Sincerely,

KRISTIN

RATAJCZAK

Digitally signed by
KRISTIN RATAJCZAK
Date: 2022.06.03
07:26:40 -06'00'

Kristin Ratajczak
NPDES and Wetlands Enforcement Section
Enforcement and Compliance Assurance Division

Enclosures:

- 1) NPDES Pretreatment Industrial User Inspection Report
- 2) Photo Log

cc: Jon Wallace, Colorado Department of Health and Environment (electronic)

NPDES Pretreatment Industrial User Inspection Report
Dental Office Point Source Category
40 CFR Part 441

National Database Information	
Inspection Date: 4/13/2022	Inspection Type: Dental Discharger
Entry/Exit Time: 8:15 am / 9:00 am	NPDES ID Number: COPD00001
Inspection ID: 202204 COPD00001	NAICS Code: 621210 Offices of Dentist
Lead inspector and affiliation: Kristin Ratajczak, EPA Region 8	
Inspector and affiliation: Emilio Llamozas, EPA Region 8	
Inspector and affiliation: Edward Simas, EPA Region 3	

Facility Location Information (Name/Location/ Mailing Address)	
Site/Facility Name & Location: Fruita Family Dental 576 Kokopelli Dr. Unit B Fruita, Colorado 81521	Email Report to: Dr. Dane Christensen dane@fruitafamilydental.com

Contact Information	
	Name(s)/Title
Facility Contacts: <i>(indicate primary lead and present during inspection)</i>	Dr. Dane Christensen, Owner, Fruita Family Dental
Authorized Official(s)	Dr. Dane Christensen, Owner, Fruita Family Dental

POTW Information	
Publicly Owned Treatment Works (POTW) and NPDES ID If N/A, the Dental Point Source Category does not apply	City of Fruita POTW (CO0048854)
Direct Implementation (Y/N)	Yes
Ultimate Receiving Water(s)	Colorado River

Areas Evaluated During Inspection		
Permit	<u>Self-Monitoring Program</u>	<u>Pretreatment</u>
<u>Records</u>	Compliance Schedule	Pollution Prevention
<u>Facility Site Review</u>	Laboratory	Stormwater
Effluent/Receiving Waters	<u>Operations and Maintenance</u>	Combined Sewer Overflow
Flow Measurement	Sludge Handling/Disposal	Sanitary Sewer Overflow

Report Review and Signature		
Drafter Signature/Name	Address/Phone Number	Date
Kristin Ratajczak	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	5/24/2022
	303-312-6310	
Reviewer Signature/Name	Address/Phone Number	Date
Emilio Llamozas	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	5/25/2022
	303-312-6407	
Supervisor Signature/Name	Address/Phone Number	Date
 Digitally signed by Boeglin, Michael Date: 2022.06.02 16:26:10 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	6/2/2022
	303-312-6250	
Michael Boeglin		

Inspection Narrative and Site Description

Introduction

The inspection was conducted at Fruita Family Dental (facility) to evaluate compliance with the Dental Office Point Source Category (40 CFR Part 441). The facility discharges its wastewater to the City of Fruita POTW (NPDES Permit No. CO0048854), which does not have an approved pretreatment program. The EPA is responsible for implementing the pretreatment regulations within the State of Colorado and is the control authority for industrial users that discharge wastewater to POTWs without an approved pretreatment program.

On April 13, 2022, U.S. Environmental Protection Agency (EPA) Region 8 inspectors Kristin Ratajczak and Emilio Llamozas and EPA Region 3 inspector in training, Edward Simas (jointly referred to as inspectors) met with Dr. Dane Christenson, owner of Fruita Family Dental. The inspectors presented their credentials and held an opening conference to explain the purpose of the inspection. Inspectors proceeded to ask questions to the facility representative, inspect the facility, and review records to evaluate compliance with applicable regulations. Throughout the inspection, inspectors noted their observations in a bound checklist. Photographs taken during the inspection are included in the attached photo log.

Facility Description

Fruita Family Dental practices general dentistry, and places and/or removes mercury amalgam. The facility began operation in April 2017 and meets the definition of an existing source, as defined in 40 CFR Part 441.20. The facility operates 8:00 AM – 5:00 PM Monday through Thursday one week, and 8:00 AM – 5:00 PM Tuesday through Friday the following week. At the time of the inspection, three chairs were available for use at the facility, with a fourth planned for future use. Two of the three chairs were used for mercury amalgam placement or removal and plumbed to the amalgam separator.

Amalgam Separator Description

The amalgam separator in use at the facility, a Solmetex NXT Hg5 (separator), was located in a utility closet in the back of the practice. Records indicated the separator was installed in 2020, and Dr. Christensen indicated a Syclone separator had been in use prior to the current model. The separator was ISO 11143 compliant and sized appropriately for the number of chairs plumbed to the separator. At the time of the inspection, the cannister in use had been installed on September 3, 2021 and the separator was approximately 50% full of solids. See photos 110, 111, and 112.

Operations and Maintenance

Regarding cannister inspections and replacements, Dr. Christensen indicated the operations were performed weekly and annually, respectively; however, inspection records were not kept. At the time of the inspection, the facility was using Safco Kleen Line Enzymatic Line Cleaner, which had a neutral pH, according to the product's safety data sheet.

Conclusion

On April 13, 2022, inspectors held a closing conference with Dr. Christensen where they discussed preliminary findings. On April 25, 2022, the EPA sent an email to Dr. Christensen with the preliminary findings from the inspection. On April 29, 2022, Dr. Christensen sent an email to the EPA

explaining the facility's compliance efforts. Discussion of relevant information from the April 29, 2022, correspondence has been included in the section below.

Findings, Corrective Actions and Recommendations

Finding #1: Records of weekly inspections of the amalgam separator were not kept.

During the inspection, the facility representative stated that weekly inspections of the amalgam separator were completed; however, there were no records kept of the inspections.

Pretreatment Requirement:

40 CFR Part 441.30(a)(1)(iv) requires amalgam separators to be inspected in accordance with the manufacturer's operating manual.

40 CFR Part 441.50(b)(1) requires inspection records to be kept.

Corrective Action:

On April 29, 2022, Dr. Christensen provided photo documentation indicating a weekly inspection log had been implemented at the facility. No additional action is needed regarding this finding.

Finding #2: Records of disposal from wastes including whole tooth extractions containing mercury were not kept.

The facility representative indicated that whole tooth extractions containing mercury amalgam were disposed of in the biowaste container. Records of biowaste disposal were not available at the time of the inspection.

Pretreatment Requirement:

40 CFR Part 441.50(b)(3) requires dental dischargers to maintain records of all dates that collected dental amalgam is picked up or shipped for proper disposal, including the name of the permitted or licensed treatment, storage, or disposal facility receiving the amalgam retaining containers.

Corrective Action:

On April 29, 2022, Dr. Christensen indicated via email that he had spoken with the company, that provides the biowaste containers for the facility, MSDI. MSDI recommended a separate container for amalgam wastes. Documentation indicating the proper container had been obtained was provided to the EPA. Ensure records of disposal are maintained, documenting the information required in 40 CFR 441.50(b)(3). No additional action is needed regarding this finding.

Finding #3: The facility had not submitted its One-Time Compliance Report form.

At the time of the inspection, the facility had not submitted its One-Time Compliance Report Form. On Sunday, April 17, 2022, the facility submitted its One-Time Compliance Report Form to EPA. Ensure a copy of the completed One-Time Compliance Report Form is maintained. No additional action is needed regarding this finding.

Pretreatment Requirement:

40 CFR Part 441.50(a)(1) requires existing sources to submit a One-Time Compliance Report to the control authority no later than October 12, 2020, to include the contents listed in 40 CFR Part

441.50(3).

40 CFR Part 441.50(a)(5) requires dental dischargers to maintain its One-Time compliance Report as long as it's subject to regulation or until ownership is transferred.

Corrective Action:

Ensure a copy of the completed One-Time Compliance Report Form is maintained. No additional action is needed regarding this finding.