

April 16, 2020

Andrew R. Wheeler
Administrator
Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Administrator Wheeler:

On behalf of the Academy of General Dentistry (AGD) and its 39,000 members, we are committed to adhering to the specifications of the EPA amalgam separator rule. The final rule was published on June 14, 2017, *Effluent Limitations Guidelines and Standards for the Dental Category, RIN 2040-AF26*. Compliance for the majority of dentists begins on July 14, 2020.

Nearly all dentists across the nation are presently only engaging in emergency procedures. As dentists, many small business owners are dealing with the extraordinary challenges of retaining their staff and paying their bills without sufficient revenues being collected. As we look toward recovery and instituting new infection control policies and procedures, dentists must establish new practices to ensure the safety of patients and staff. Furthermore, dentists will need to procure the highest level of personal protective equipment, which has been in short supply in the U.S.

As the safety of patients is paramount, dentists need to focus their efforts on new infection control measures. We ask that you delay the compliance date on the amalgam separator final rule for up to one year so that dentists can harness their time, energy, and resources on new infection control measures.

We thank you for your consideration. As we work to effectively combat the COVID-19 pandemic, the AGD is ready to assist in any way we can. If you have questions or comments, please do not hesitate to contact Jeanie Kennedy, Manager, Dental Practice & Policy at jeanie.kennedy@agd.org.

Sincerely,

A handwritten signature in black ink that reads 'Connie L. White, DDS, FAGD'. The signature is written in a cursive style.

Connie L. White, DDS, FAGD
AGD President