



**Fact Sheet for the Dental Industry**  
**Recycling Your Scrap Metals: Protecting the Environment Safely and Legally**

Dentist offices, dental labs and others in the dental industry produce a variety of metallic scrap materials. When disposed of improperly (by throwing in the trash or flushing down a sink), these metals may harm the environment by contaminating our water. However, recycling dental scrap metal, when done properly, can be protective of the environment and add revenue to your business – a classic “win-win.” This fact sheet provides more information on how to recycle your scrap metal safely and legally.

**What types of metal scrap can be recycled?**

Dental businesses produce many precious metal materials that can no longer be used, including crowns, bridges, sprues, inlays, outlays, casting buttons, and metal shavings or grindings found in bench sweeps, floor sweeps, carpeting, dust collector bags, vacuum bags and filters. Even the smallest amounts of precious metals, such as gold, silver, platinum, and palladium can be recycled, returning money to your business while protecting the environment.

**Is the recycling of dental scrap metal subject to hazardous waste regulation?**

Most dental scrap metal is exempt from hazardous waste regulation under state and federal requirements and can be sent to Argen for recycling. That means that there are minimal legal restrictions on how you store or transport scrap metal to a reputable recycler. Even without legal restrictions, Argen recommends you utilize the practices described below when handling your metal scrap.

In California, while most dental scrap metal is exempt from hazardous waste requirements, some types may not be. First, dental amalgams typically contain mercury and are required to be managed under California’s Universal Waste regulatory requirements.<sup>1</sup> Argen does not accept dental amalgams. Second, if the dental scrap metal is in the form of a “fine powder” then it may have to be handled as a hazardous waste in California.<sup>2</sup> A fine powder is any metal in dry, solid form with particles smaller than 100 microns in diameter (100 microns is 1/10 of a millimeter or smaller than most beach sand). Some metal grindings or shavings could potentially be less than 100 microns and could classify as a hazardous waste if a representative sample of the waste exceeds certain levels for total or leachable metals. It is the responsibility of each generator to evaluate its dental scrap metal to determine if it is a regulated hazardous waste in California. If you are a dental facility in California or are out-of-state but considering shipping scrap of this nature to our California recycling facility, please contact your local or state

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<sup>1</sup> 22 CCR 66273.9 and the Universal Waste Fact Sheet referenced at the end of this document.

<sup>2</sup> 22 CCR 66260.10.



hazardous waste agency with any questions on the regulatory status of the material. We have provided a list of regulatory contacts at the end of this fact sheet.

Argen is presently working with authorities in California to simplify the regulatory requirements for precious metal scrap that is 100 microns or less and being sent for recycling. Should any changes in the current regulations be promulgated, we will update this Fact Sheet to incorporate any new information on this topic.

### **How should I store and ship my scrap metal?**

Argen recommends you use the following precautions when storing and shipping your metal scrap:

- Place your metal scrap in a sealed container (either sealed plastic bag or other container).
- Before transporting, make sure the containers are packed in such a manner that prevents any spilling or breakage during transport.

If your scrap metal is a fine powder, it may require additional handling requirements. Again, we recommend you contact the appropriate regulatory agency regarding such materials.

### **Managing other types of dental wastes**

The following publications provide more information on managing dental wastes:

- [Dental, Medical and Veterinary Offices: Managing Your Hazardous Waste](#)
- [Universal Waste Fact Sheet \(addressing dental amalgams\)](#)
- [Hazardous Waste Generated by Dental Offices](#)

### **Questions?**

If you are in **California** and have regulatory questions about the management of dental scrap metal, contact your local Certified Unified Program Agency also known as a CUPA. You can locate your CUPA by using this directory: <http://cersapps.calepa.ca.gov/public/directory/>

If you are **outside California**, contact your state hazardous waste agency using this directory: <http://www.epa.gov/osw/wyl/stateprograms.htm>

