



Virginia Dental
ASSOCIATION

April 6, 2023

Virginia Department of Environmental Quality

1111 East Main Street

Richmond, VA 23219

To Whom it May Concern,

The Virginia Dental Association has heard significant concern from many of our members regarding the recent rewrite and reorganization of the Virginia Medical Waste Regulations, which became effective on March 15, 2023. Of most concern is the requirement for generators of less than 250 gallons of RMW per calendar month to arrange for removal of such waste at least once per calendar month.

Most dental offices produce very limited waste. They typically dispose of the required waste annually or as needed because containers do not fill very quickly (many smaller offices won't even begin to fill up a sharps container in a month). The requirement to remove containers once a month will cause an unnecessary expense for most dental offices.

Dental offices were previously considered small generators of medical waste, including sharps. As such, they were exempt from many of these regulatory burdens.

We recognize that the Waste Management Board has implemented the amended regulations to improve the handling and treatment of regulated medical waste, however; this monthly requirement of the disposal of generators of less than 250 gallons of RMW (which includes sharps containers) for dental offices is unnecessary to apply to dental offices and will draw practice resources away from providing essential dental care without improving patient or office safety.

We appreciate your consideration of these important concerns and welcome the opportunity to further discuss these regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Dunn".

Ryan Dunn
CEO

A handwritten signature in brown ink, appearing to read "Cynthia M. Southern, DDS".

Cynthia Southern, DDS
President