

## **Addendum A**

### ***Dental Facilities Wastewater Discharge Permit Monitoring Alternative for Amalgam Separator Installation Requirement***

The Permit Holder may choose to sample the facility's wastewater discharge in lieu of installing an ISO Standard 11143 certified amalgam separator. The following details the Permit Holder's monitoring requirements:

1. Apply for a standard EBMUD Wastewater Discharge Minimization Permit (permit fee \$1,770/year) by December 31, 2004
2. Comply with EBMUD Ordinance No. 311A-03 and all applicable regulations, including the Ordinance's wastewater discharge limits for mercury, copper, silver, and zinc. The Permit Holder will be subject to enforcement fines and penalties defined in the Ordinance, including Federal EPA's Significant Noncompliance Criteria, which requires that the name of the dental practice in violation will have its name printed in the largest local newspaper (i.e., Oakland Tribune)
3. Comply with the current edition of EBMUD's Wastewater Discharge Permit Standard Terms & Conditions
4. Contract with a California licensed professional engineer to identify a representative sampling location(s) on the dental practice's wastewater lines that receives amalgam waste for discharge to the sanitary sewer
5. Install a sample tap on the wastewater discharge line, which has been approved by EBMUD
6. Contract with a professional environmental services company to conduct quarterly self-monitoring sampling for mercury, copper, silver, and zinc. The samples will consist of a composite of discrete aliquots of wastewater collected at regular intervals throughout the workday. EBMUD staff will audit random self-monitoring events to ensure that representative samples are collected. If EBMUD deems that the samples collected are nonrepresentative, the District holds the right to conduct all monitoring of the wastewater discharge (\$590/event). All samples are required to be analyzed by a state certified laboratory.
7. Submit a quarterly self-monitoring report. The reports will:
  - Meet the certification and signatory requirements
  - Include the analytical data for all samples collected
  - Quality assurance/quality control data
  - Chain-of-Custody documentation

If EBMUD deems that the report is incomplete, the Permit Holder may have to repeat the sampling event. If the Permit Holder demonstrates consistent compliance with the wastewater discharge limits for a period of one year, the Permit Holder may request a reduced sampling and reporting frequency.