CITY OF BOISE
MERCURY MINIMIZATION

By: Zach Conde
AREA OF IMPACT

• **Population**
  - 223K in the City of Boise
  - 25K in the City of Eagle
  - 12K in the City of Garden City
  - Total of 265K in our area
PUBLICLY OWNED TREATMENT WORKS (POTW)

- 900 + miles of pipe within the City
- **West Boise Water Renewal Facility**
  - Current design flow is 24 million gallons per day (MGD)
  - Typical flow is 17 MGD
- **Lander Street WRF**
  - Design flow is 17 MGD
  - Typical flow is 11 MGD
- Current total system design flow
  - ~40 MGD
  - Typical flow is 28 MGD
- Biological plants
PRIOR TO MERCURY MINIMIZATION PLAN

• 2002 Local Limits Analysis - showed potential need for Mercury Local Limit
• 2003 Pollution Prevention Strategy – Household Hazardous Waste Collection, Voluntary Dental Office BMPs, Education & Outreach, etc.
NPDES PERMIT

- Effective August 1, 2012
- Established new Mercury Limits
  - Daily Maximum: 19 ng/L
  - Monthly Average: 9 ng/L
- Required New Local Limits Analysis
- Required Mercury Minimization Plan (MMP) development and annual reporting
2013 LOCAL LIMITS ANALYSIS

- Used 2004 EPA Local Limit Development Guidance & EPA Region 7 Spreadsheet for Analysis
- Maximum Allowable Headworks Loading (MAHL): 0.022 lbs/day
- Maximum Allowable Industrial Loading (MAIL): 0.0071 lbs/day (32% of MAHL)
- Reserve for potential growth & slug load discharges
CITY WIDE IMPLEMENTATION

- 2014 major mercury slug load at the West Boise facility - Elimination of Septic Receiving Facilities
- Collection and Treatment Systems Clean and Maintenance Practices
- Practice Greenhealth Program Participation
- Mercury Free Certification for Schools and Universities
- Automobile/HVAC Switches Programs
- Artisanal Gold Mining Cooperation
- Public Outreach and Activities
HOUSEHOLD AND CESQG WASTE COLLECTION

- Program began in 1989 as an annual event
- Evolved into a monthly rotating neighborhood drop-off at ten locations throughout the City – 123+ collection days per year
- County Landfill drop off site
- Over 16,000 lbs. of mercury containing waste collected annually
- Conditionally Exempt Small Quantity Generators
  - Can take to landfill drop off facility and pay a fee for disposal
SIGNIFICANT INDUSTRIAL USERS (SIU)

- <1000 gallons per day: 0.7 ug/L concentration limit
- >1000 gallons per day: 0.7 ug/L daily maximum monthly average loading
- Rarely discharge mercury – reduced sampling frequency
MINOR INDUSTRIAL USERS (MIU)

- Local Limit Sampling
- Concentration-based Limit: 0.7 ug/L
MIU MERCURY EXCEEDANCE

- Automatic Notice of Violation for exceedance
- Mercury Incident Report
  - Determine possible source of mercury
- Clean pretreatment equipment
- Work with facility to implement corrective action
- Re-sample
DENTAL OFFICES

- 2014 - Best Management Practices (BMPs) in lieu of numerical limit
  - Mandatory Amalgam Separators
  - Mandatory maintenance & record keeping
  - Recommended BMPs for all other dental office waste
- Applications for annual certifications
- Inspections every 3 years
AMALGAM SEPARATORS

• ISO 11143 Certified
• 99% Efficiency Rating
• OR 95% or better if already existing
• Approved Separators:
  • $75 - $750 unit
  • $150 - $250 install
  • $300 - $550 minimum annual cost
  • Solmetex Hg5 – most popular
DENTAL BMP PROGRAM IMPLEMENTATION

• 2014 Letter to all of the dental offices
  • Notified them of the new mandatory rules
  • Included application
  • 6 months to comply

• Class 1
  • No response

• Class 2
  • Inspected before, no separator
  • Application said they have separator

• Class 3
  • Inspected before, had separator
  • Application said they have separator
RESULTS

• Dental Offices: currently 100% compliance with Amalgam Separator Rules!!

• Effluent Mercury Concentrations:

<table>
<thead>
<tr>
<th></th>
<th>FY2005</th>
<th>FY2017</th>
<th>Reduction</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lander Street WRF</td>
<td>2.2776 ng/L</td>
<td>1.39 ng/L</td>
<td>64%</td>
</tr>
<tr>
<td>West Boise WRF</td>
<td>3.088 ng/L</td>
<td>1.93 ng/L</td>
<td>60%</td>
</tr>
</tbody>
</table>

• Biosolids Annual Average Mercury Concentration:

<table>
<thead>
<tr>
<th></th>
<th>FY2003</th>
<th>FY2017</th>
<th>Reduction</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1.8 mg/kg dry weight</td>
<td>.49 mg/kg dry weight</td>
<td>73%</td>
</tr>
</tbody>
</table>
THANK YOU

Zach Conde
ENVIRONMENTAL TECHNICIAN
Pretreatment Program
zconde@cityofboise.org
Office: 208-608-7530
Cell: 208-272-0665
Fax: 208-433-5650

PUBLIC WORKS DEPARTMENT
2003 POLLUTION PREVENTION STRATEGY

• Identified Mercury as a Tier One candidate
• Thermometer Exchange Program
• Hospitals for a Healthy Environment (H2E)
• Schools and Universities
• Thermostat Recycling Corporation (TRC)
• NW Automotive Trades Association (NATA)
• Household Hazardous Waste (HHW) & Public Outreach
• Dental Best Management Practices
WEST BOISE WRF EXCEEDANCES

- January 22, 2014: Received a slug load of an estimated 8.1 lbs. of elemental mercury, resulting in exceedance of month and daily limitations
- Thought to have been introduced from a septage load

- Other minor exceedances occurred between 2012-2015 from resuspension of mercury in collection system due to line cleaning, septage waste, illicit discharges to the collection system, and construction and maintenance and the WRF
MIU VIOLATIONS

City of Boise
Industrial Waste Pretreatment Program
Mercury Incident Report

Your facility has been issued a Notice of Violation for exceeding the City’s Mercury Local Limit. This form must be completed, signed, and returned within 30 Days of the date of receipt of NOV notice.

Mercury Source:
Please indicate the following mercury sources located or used in your facility. Place a check in the boxes provided. Circle specific sources listed. If you have identified a source of mercury that is not listed here please add it at the bottom of the page.

- Barometers
- Batteries - List the types (Selenium)
- DC Volt hour meters, Fiber meters, Vibration meters
- Consumption/Power relay power supply switching for high-voltage applications such as lighting, resistance heating, commercial meters
- Flame sensors/stirrers valves for unsupervised burners • Some infrared burners (Robert Shaw and Harper Vians) • Some furnace (White Rodgers)
- Lamps: Fluorescent, high-pressure sodium, metal halide • Ultraviolet
- Mirrors: • Tank pump, float • Relay switches • Pressure control • Mix switches • Silent light switches • Temperature control • Air alarm bell switch
- Read relays • Used for low-voltage, high-precision analytical equipment
- Thermometers
- Thermostats • Oven, room temperature control, refrigerators
- Vacuum gauges • Needle or Bourdon gauges, manometers
- Vehicle applications: ABS modules • Conventional light switches • Active ride control systems switches • HID headlamp bulbs

Please continue on other side 3
MIU VIOLATIONS

Have any of the following events occurred at your facility in the past three months? Note Yes or No and briefly describe the incident, including approximate date.

<table>
<thead>
<tr>
<th>Event/Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
</tr>
<tr>
<td>Light bulbs broken and/or replaced. (Examples include Fluorescer, High-pressure sodium, Mercury arc, Mercury vapor lamps, Metal halide, Compact)</td>
</tr>
<tr>
<td>Painting: Have any paint been removed? Has Painting occurred?</td>
</tr>
<tr>
<td>Concrete Work: Cutting, removal, and installation.</td>
</tr>
<tr>
<td>Thermostat: Replaced or Replaced?</td>
</tr>
<tr>
<td>Fire Alarm: Replaced or Replaced?</td>
</tr>
<tr>
<td>Installation/maintenance/removal of pumps: Pumps, pipes, pumps, fire sprinkler, fire extinguishers, and other fluid controls.</td>
</tr>
<tr>
<td>Spills: chemical, oil, antifreeze, cleaning solutions</td>
</tr>
<tr>
<td>Equipment: New equipment installed. Did replaced and or repaired.</td>
</tr>
<tr>
<td>Processes: Any change in previous processes.</td>
</tr>
<tr>
<td>Products: Change in vendor or manufacturer? Is there a new product used in daily activity?</td>
</tr>
</tbody>
</table>

| Facility Representative | Signature | Date |
MIU MATRIX

PULL SAMPLE FOR Hg, LL, pH
Hand out LL/Hg Fact Sheet

SAMPLE RESULTS RECEIVED
Determine Compliance Status

OUT OF COMPLIANCE
Prepare to Escalate

SAMPLE RESULTS RECEIVED
Determine Compliance Status

NO SOURCE
Order OSI Pumped Within 7 Days

SOURCE IDENTIFIED
One Time Event? Ongoing Event? ELIMINATE SOURCE
Order OSI Pumped Within 7 Days

RESAMPLE FOR Hg, LL, pH
RESAMPLE FOR APPROPRIATE LOCAL LIMIT OR pH

OUT OF COMPLIANCE
Prepare to Escalate

OUT OF COMPLIANCE
Prepare to Escalate

OUT OF COMPLIANCE
Prepare to Escalate

ADMINISTRATIVE ENFORCEMENT AND/OR FINES
Prentreatment Coordinator

OUT OF COMPLIANCE
Prepare to Escalate

OUT OF COMPLIANCE
Prepare to Escalate

NO SOURCE
Order OSI Pumped Within 7 Days

SOURCE IDENTIFIED
One Time Event? Ongoing Event? ELIMINATE SOURCE
Order OSI Pumped Within 7 Days

COMPLIANT
No issues Send Sample Fix Letter

OUT OF COMPLIANCE
Prepare to Escalate

OUT OF COMPLIANCE
Prepare to Escalate

OUT OF COMPLIANCE
Prepare to Escalate

NO SOURCE
Order OSI Pumped Within 7 Days

SOURCE IDENTIFIED
One Time Event? Ongoing Event? ELIMINATE SOURCE
Order OSI Pumped Within 7 Days

RESAMPLE FOR ANY IDENTIFIABLE SOURCE
Determine Compliance Status

RESAMPLE FOR ANY IDENTIFIABLE SOURCE
Determine Compliance Status

ON-SITE COMPLIANCE ASSISTANCE WITH OWNER
Troubleshoot Facility
Determination of Necessary Fix/Up Date
Senior Specialist

ON-SITE COMPLIANCE ASSISTANCE WITH OWNER
Troubleshoot Facility
Set Fix/Up for 30 Days
Senior Specialist

HIGH MERCURY
NOV
Place in Pending
Prepare Fix, NOV,
Hg Source
Identified

HIGH LOCAL LIMIT
or pH
Place in Pending

OUT OF COMPLIANCE
Prepare to Escalate

ON-SITE COMPLIANCE ASSISTANCE WITH OWNER
Troubleshoot Facility
Determination of Necessary Fix/Up Date
Senior Specialist

SAMPLE RESULTS RECEIVED
Determine Compliance Status

OUT OF COMPLIANCE
Prepare to Escalate

SAMPLE RESULTS RECEIVED
Determine Compliance Status

OUT OF COMPLIANCE
Prepare to Escalate

SAMPLE RESULTS RECEIVED
Determine Compliance Status

OUT OF COMPLIANCE
Prepare to Escalate
BMP FOR DENTAL CARE PROVIDERS

BEST MANAGEMENT PRACTICES (BMPs) FOR DENTAL CARE PROVIDERS

For Minimization of Mercury Discharge to the Sewerage System By Dental Care Providers

Introduction and Regulatory Background:
Mercury discharges to the environment are receiving significant attention throughout the United States including dental facilities. Improper waste management from dental offices, e.g., amalgam waste, mercury-laden filters, and dental products with mercury, can cause toxic discharges to sewers and water bodies. Local and state wastewater agencies have the ability to regulate dental office discharges through existing sewer use ordinances, typically in conjunction with a permit program and compliance program. The Dental BMP Program has been updated to specifically address mercury amalgam, other environmentally concern waste and regulatory requirements imposed by local and state wastewater treatment discharge permits.

In addition to the environmental benefits of proper waste management, through pollution prevention, dentists can also reduce the regulatory requirements associated with dental waste by complying as outlined. This guide was prepared to assist dentists on how to best manage the disposal of dental waste. Specifically, the BMP program was developed to help dentists properly manage dental waste to ensure compliance with applicable environmental, household, occupational health, and transportation regulations.

This program relies on mandatory amalgam separators, supported by easy-to-implement and cost-effective BMPs to assure compliance with applicable wastewater discharge permit limits. The BMPs provide additional waste management and pollution prevention.

This set of mandatory and recommended BMPs for Dental Care Providers relies on two principle concepts:
1. Installation and maintenance of a city approved ISO 11143 certified amalgam separator.
2. Reduce and Recycle all dental waste.

ISO certified amalgam separators on the market today are easily affordable and highly effective at trapping amalgam particles in dental office wastewater discharges.

Encouraging the reduction and recycling of dental waste is the preferred approach as this reduces the amount of solid waste associated with dental waste. Dental waste management vendor information is in an appendix to this document.

If recycling of dental waste is not an option, proper disposal in hazardous waste is necessary. Ada County and the City of Boise have hazardous waste collection programs designed for small generators of waste such as dental care providers. For example, Ada County operates a conveniently-stored small quantity processor (CSP) program that can accept up to 300 combined pounds of scrap amalgam, a city filter solution, and lead fish per month.
MANDATORY BMP:

AMALGAM SEPARATORS

Install and properly maintain a City approved amalgam separator meeting ISO 11143 certification. The amalgam separator must achieve a minimum of 99 percent removal efficiency of dental amalgam, by weight, in accordance with ISO 11143 test procedures, as verified by an ISO-certified testing laboratory.

Amalgam separators in service at dental facilities prior to the effective date of this Dental BMP prevention standard, must be certified to achieve a minimum 95 percent removal efficiency of dental amalgam, by weight, in accordance with ISO 11143 test procedures as verified by an ISO-certified testing laboratory. Existing facilities meeting this 95 percent standard shall be required to upgrade to a City approved unit when any modification is made to the vacuum system, the number of operators served changes, or when the existing amalgam separator must be replaced.

Amalgam separators shall:
- Be validated to meet manufacturer’s minimum specifications and serve all operators connected to the vacuum system.
- Be installed in accordance with applicable State or local codes.
- Be installed prior to vacuum pump systems (dry or wet).
- Be inspected weekly for collection system fill volume with results recorded.

Maintenance
- Maintain the amalgam separator in accordance with manufacturer’s recommendations.
- Use amalgam separator manufacturer approved vacuum system line cleaning.
- Replace separator filter cartridges or collection systems reservoir as required by the manufacturer recommendations but not less than once per year, unless otherwise approved by the City.

Record Keeping
- All maintenance and inspection records for the amalgam separator shall be retained for 3 years and be made available to the City Inspector upon request.

RECOMMENDED BMP:

AMALGAM WASTES

Limit the amount of amalgam used to the smallest appropriate size for each restoration. Use only pre-capsulated dental amalgam.

Eliminate all use of bulk elemental mercury (also referred to as liquid or one mercury). Any unused bulk elemental mercury must be recycled or handled as hazardous waste. It must never be disposed in the regular trash, hazardous waste (red bag), or down the drain.

Change or clean chair-side amalgam traps as needed or as recommended by the manufacturer.

Do not run amalgam traps over drains or sinks. Consider dedicating specific traps to amalgam.
DENTAL BMPS CONTINUED...

placement and removed to minimize the number of amalgam-containing trays that need to be managed. (Trays associated only with hgauer slags can be disposed of in the regular trash.)

Change vacuum pump filters as needed or as recommended by the manufacturer. This action will also improve suction and extend the life of the vacuum pump.

All amalgam waste must be handled by a licensed waste management company for recycling or disposal as hazardous waste.

- Non-contaminated trim:
- Contaminated amalgam trim:
- Look for usable amalgam capsulas.
- Amalgam waste must go in the regular trash, not in with infectious waste (red bag), or flushed down the drain. Clean-side traps or vacuum pump filters containing amalgam must go in the regular trash or sink.

Empty amalgam capsules can be placed in the regular trash.

Store amalgam waste as directed by your hazardous waste management contractor. This typically includes being in sealed, aggregated, and clearly labeled amalgam plastic containers. Check with your contractor for any specific requirements such as disinfection steps or necessary dry storage.

Retain amalgam waste disposal/recycling records provided by your contractor. Documentation of all amalgam waste recycling and disposal must be removed from your facility or hazardous waste holder, kept on file, and made available to a City inspector upon request.

X-RAY FIXER AND DEVELOPER

Proper disposal: X-ray fixer waste. Fixer waste is considered a hazardous waste because of its high silver content. Recycling fixer waste is the recommended method by regulatory agencies.

There are two suitable methods of managing fixer waste:

a) You may use a silver recovery unit for your developing system, or
b) You may collect the fixer waste for off-site recycling and proper disposal.

If you dispose of your fixer onsite, collect and store it in a closed plastic container labeled

- Hazardous Waste - X-Ray Fixer (contains silver)

May require special waste handled to protect the environment. If you decide to store silver fixer waste, you must make sure the liquid does not contact developer. If it does, it could contaminate the liquid contained in developer. If this occurs, it could contaminate silver from the recycling equipment. The liquid that has run through a recovery unit can be disposed of down the drain.

Do not use X-ray developer solutions with fixer solutions. Waste developer can be washed down the drain, if it is not mixed with fixer. Finish the drain thoroughly as you discharge developer down the drain.

Some states may the fixer and developer after they are spent. The resulting solution is hazardous and should be disposed of as hazardous waste (see amalgam waste for more information on hazardous waste disposal options). However, you may purchase an adapter kit to keep the fixer and developer separate.
DENTAL BMPS CONTINUED...

LEAD FOIL AND LEAD SHIELDS

Recycle or dispose of lead foil that inhibits x-ray film or protective lead shields as hazardous waste. These materials should never be disposed of in the regular trash because they are hazardous waste and should be recycled for their heavy metal content. Companies which recycle amalgams or any other mercury-containing waste. A list of metal reclaimers is available on the Idaho Department of Environmental Quality website.

Do not reuse lead foil or give lead foil to patients for reuse.

CHEMCLAY WASTE

Switch from chemically sterilized to autoclave. Normal use and discharge of chemclay solutions to the sewer is acceptable. Freshly disposed with several gallons of water so that it does not get in the main trap or introduce a slug of material to the sewer system.

Use up or dispose of discarded material properly. Dental offices should buy only the amount of chemclay sterilizer that you need; this will eliminate the need to dispose of excess material. If you switch to an autoclave and have a supply of unused immobozide, you should recycle or dispose of properly.

LABELING

Properly labeled the containers in which you store your hazardous waste. You should check with your disposal company, typically these containers must be labeled with the words “hazardous waste” with a description of the waste, e.g. “Hazardous Waste - Contains only used fluids for recycling only.”

The data you must filling the container should be written on the container. Make sure you keep a written record of any material you send or deliver to a recycling entity. Be sure to request a “Certificate of Recycling or Disposal.”

ADDITIONAL RECOMMENDED BMPS

Use disposable amalgams tips instead of reusable tips, and have them recycled or handled as hazardous waste if they contain amalgam waste.

Clean or replace sink traps and range, taking care to avoid spillsage of the contents from plumbing parts.

Reserved jackets must be recycled or handled as hazardous waste.

Use, when appropriate, based on your professional judgment, mercury-free alternatives to amalgams such as gold, ceramic, porcelain, composites, polymers, or glass inner seat.

Implement a program to have mercury-containing thermometers, switches, and fluorescent light bulbs recycled when they are replaced. Thermometers and switches should be replaced with mercury-free alternatives.
## Approved Amalgam Separators

<table>
<thead>
<tr>
<th>Manufacturer</th>
<th>Amalgam Separated</th>
<th># Chairs</th>
<th>Indicators For Malfunction Or Replacement</th>
<th>Holding Capacity</th>
<th>Collection Service Offered</th>
<th>ISO11143 Certified At 99%?</th>
<th>Estimated Costs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Solmetex</td>
<td>Hg5</td>
<td>1-10</td>
<td>User conducts visual and sediment level inspection</td>
<td>1.66 liters</td>
<td>Purchase of a new container includes box and UPS label to ship to recycler</td>
<td>Yes</td>
<td>Initial cost $700, Installation approx. $200, Replacement cost minimum $300/year</td>
</tr>
<tr>
<td>DNA</td>
<td>BU-10</td>
<td>1-6</td>
<td>None – Canister replaced annually to ensure proper functioning</td>
<td>10 liters</td>
<td>Annual recycling includes replacement unit, recycling and waste disposal documentation</td>
<td>Yes</td>
<td>Separator $750, Install $200, Replacement annually $100</td>
</tr>
<tr>
<td>R&amp;D Services</td>
<td>CF18 or CE24</td>
<td>2-5</td>
<td>Conduct visual slag level checks</td>
<td>1.6 liters</td>
<td>None – Self service or hire contractor to remove</td>
<td>Yes</td>
<td>Separator $75, Installation $150, SH $20/Unit, Replacement canister $150</td>
</tr>
<tr>
<td>Mid Ents</td>
<td>Amalas-5</td>
<td>1-3</td>
<td>None – Unit changed out after one year</td>
<td>Not given</td>
<td>Annual recycling agreement with prepaid shipping label and packaging by FedEx, unit is recycled, documentation</td>
<td>Yes</td>
<td>Separator $549, Replacement separator $549, Install not available</td>
</tr>
<tr>
<td>MARS</td>
<td>Liberty Boss</td>
<td>1-3</td>
<td>None – Entire unit replaced</td>
<td>1 gallon</td>
<td>Entire unit sent via FedEx to a verified environmental site for recycling</td>
<td>Yes</td>
<td>Separator $516.33, <em>Quick,</em> disconnects $100, Replacement separator $516.33, Install costs – unknown</td>
</tr>
</tbody>
</table>

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**AMALGAM SEPARATORS**
APPLICATIONS FOR COVERAGE

CITY OF BOISE
APPLICATION FOR COVERAGE
UNDER THE DENTAL EMP PROGRAM

SECTION 1 – GENERAL INFORMATION

Part A – General Information
1. Dental Practice or Company Name:

2. Mailing Address:
   a. Street or P.O. Box:
   b. City, State, and Zip Code:
   c. Primary practice e-mail address:

3. Facility Site Address: same as above
   a. Street Address:
   b. City, State, and Zip code:

4. Designated Company or Practice Signatory Authority:
   a. Name:
   b. Title:
   c. Phone #: 

5. Designated Contact/Office Lead Person:
   a. Name:
   b. Title:
   c. Phone #: 

6. Normal office schedule: _______ hours/day _______ day/week

7. List All Dentists that practice at this location:
   Dr. ____________________________________________
   Dr. ____________________________________________
   Dr. ____________________________________________
   Dr. ____________________________________________
   Dr. ____________________________________________
   Dr. ____________________________________________
   Dr. ____________________________________________
   Dr. ____________________________________________
   Dr. ____________________________________________
   Dr. ____________________________________________

1
APPLICATIONS FOR COVERAGE

Type of Dental Practice (check all that apply)
- General Dentistry
- Endodontist
- Periodontist
- Oral and Maxillofacial Surgeon
- Orthodontist
- Other

Is amalgam placed or removed at any time at this facility? Yes [ ] No [x]

Complete the rest of the form, date and sign on Certification page and return to the City Permitment Group.

Mercury
- Is there any bulk or non-encapsulated Mercury on-site? Yes [ ] No [x]
- Mercury Amalgam used in practice? Yes [ ] No [ ] Avg # / Month:
- Mercury Amalgam Fillings Removed? Yes [ ] No [ ] Avg # / Month:

Is there an ISO 11143 Amalgam Separator installed on the practice’s vacuum system? Yes [ ] No [x]

Brand Name: ________________________________
Model: ________________________________

Number of Dental Operators at the facility: ________

Are all the operators connected to the vacuum system? Yes [ ] No [ ]

Waste Disposal:
- Amalgam Separator maintained by: in-house by staff? [ ] a dental supply vendor? [ ]

Provide name and contact information for your Dental equipment vendor or waste contractor:

Vendor or Contractor Name: ________________________________
Phone: ________________________________

Are any process changes or expansion of office operations planned during the next two years? Yes [ ] No [ ]
APPLICATIONS FOR COVERAGE

Confidentiality:
Upon receipt of a public information request, this document could be subject to release as provided under Idaho State Code. Please indicate if there are any sections of this application that you wish to remain confidential and your basis for requiring confidentiality.

Certification Statement:
The following statement certifies that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure the qualified personnel properly gather and evaluate the information submitted. Based on my review of the person or persons who manage the system, or these persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for furnishing false information, including the possibility of fine and imprisonment for knowing violations.

Name (print)       Title

Signature
Date

1 General Office Manager or other technical staff designated by the person or person or corporate officer or board of regulation, after due notice, to act in the capacity of the person.
ONLINE BMP RE-CERTIFICATION APPLICATION
INSPECTIONS

- Approximately 150 Dental Practices
- Three year inspection rotation
- FY2017: 68 Total
- FY2018 to date: 47
- Currently 100% In Compliance with Amalgam Separator Rule!!