



**MUNICIPAL STREAMLINED
MERCURY VARIANCE (SMV) APPLICATION**
State Form 52112 (5-05)
Approved by State Board of Accounts, 2005
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Indiana Department of Environmental Management
Office of Water Quality – Mail Code 65-42
NPDES Permits Branch
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

PART ONE: General Information

Name of Facility P. L. Brunner Water Pollution Control Plant		
Facility Address 2601 Dwenger Avenue		
City or Town Fort Wayne		
State IN	ZIP Code 46803	County Allen
National Pollutant Discharge Elimination System (NPDES) Permit No.: IN0032191		
Owner or Person in Responsible Charge (i.e., Town Board President/Mayor) Thomas C. Henry		
Title Mayor		
Address 200 East Berry Street		
City or Town Fort Wayne		
State IN	ZIP Code 46802	
Name of Primary Contact Person Brian Robinson		
Address 2601 Dwenger Avenue		
City or Town Fort Wayne		
State IN	ZIP code 46803	Telephone No. 260-427-6053
E-mail Address (if available) brian.robinson@cityoffortwayne.org		
NPDES Outfall(s) Affected by Streamlined Mercury Variance Request: Outfall 001		
Receiving Stream(s) Affected by Streamlined Mercury Variance Request: Maumee River		
Facility Design Flow: 60 MGD		
Population Served: 264,000		
Number of Significant Industrial Users (as defined in 327 IAC 5-17-23): 35		

SIGNATURE BLOCK

This application must be signed by a person in responsible charge (see 327 IAC 5-2-22) to be valid. This signature attests to the following:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those 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 submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name	Title
Signature	Date Signed (month, day, year)

Return the completed SMV application package (Parts I - V) and \$50 application fee (see IC 13-18-20-12(a)(4)) to the mailing address listed above.

Part II. B.

The City of Fort Wayne (City) Water Pollution Control Plant (WPCP) has completed the required complete inventory of potential mercury sources at the WPCP. The resulting inventory list is published in the annual PMP report which includes the volume of chemicals used annually and the equipment containing mercury. The City continues to audit the list and notes the disposition of mercury-containing items in the published annual report.

The City has included standard purchasing language concerning mercury content in bids for the acquisition of new equipment and chemicals. All such bids include letters to vendors requesting mercury-free or mercury-reduced alternatives.

Part II. C

The City's Pretreatment Section has developed an interactive map of potential sources of mercury which may be contributing to the WPCP's influent. The map is updated as sites are sampled, and the sampling results are included on the map. A copy of the map is submitted annually with the PMP report.

The interactive map was developed using ArcGIS. It plots the location of the following potential mercury discharge sites and are color-coded by the following business type.

- a. Dental Clinics
- b. Hospitals
- c. Medical Clinics
- d. Nursing Homes
- e. Veterinarians and Veterinary Facilities
- f. Heating Ventilation, Air Conditioning Contractors
- g. General Industry and SIUs
- h. Automobile & Appliance Repair
- i. High School, College and Private Laboratories

In addition, the interactive map plots and color codes all prior years' mercury variance test sites. Layered under each test site are the sampling results found for each site.

The City's evaluation of potential sources also considered the results of prior variance sampling. Those results were used to help identify potential dischargers. Subsequent testing was done for those dischargers to evaluate the extent of mercury reduction.

Public Law 22-2001

The WPCP has identified the responsibilities imposed by Public Law (P.L.) 225-2001 (codified at IC 13-20-17.5) upon the significant industrial users of the WPCP. The WPCP communicates mercury outreach and awareness information during annual inspections to all significant industrial users as a part of the educational activities conducted under the PMPP. All comments are recorded on the inspection forms for each industry.

Part II. D

All previously detected levels of mercury identified from prior PMPP sampling activities concerning suspected or confirmed sources of mercury to the WPCP influent are reflected on the interactive map. The values and sampling sites are also contained in annual PMP reports. An updated proposed plan of PMPP activities is described below in Part III.

Part III.A & B

The below table reflects the planned activities to eliminate or minimize the release of mercury to waters of the state.

Action Item	Goal	Performance Measure	Schedule for Action
Review of purchasing policies and procedures	The City plans to continue the purchasing procedures outlined in prior variance applications. These include letters to vendors requesting mercury-free or mercury-reduced alternatives be included in all proposals and quotes. A review of mercury awareness will be conducted with purchasing staff.	Continued use of Mercury-Free Alternative request on project bidding and materials quotes in excess of \$5,000	Purchasing continues to use mercury-free language in policies, and bid documents. This item is ongoing and verified annually with purchasing.
Necessary training and awareness of WPCP staff	Training on specific mercury sources at the Plant, alternatives to mercury use, and recycling and disposal methods for WPCP staff will be continued.	Participation by WPCP staff	WPCP staff participate in the City's online refresher mercury training annually. All training results are recorded.
An education program for the public within the WPCP service area	An education handout will be distributed to the residential and business sectors and will be included in a City Utilities bill semi-annually. Mercury minimization handouts will continue to be included in our outreach efforts. There is a page on the City Utilities website dedicated to mercury pollution prevention information. An	A semi-annual bill backer is mailed, and outreach efforts and the website are maintained. An educational video pertaining to mercury prevention was produced and will begin airing in 2020 on closed circuit TV in Citizens Square.	Outreach material and website are reviewed annually. Bills are mailed, outreach material is handed out and website visits are recorded annually.

	educational video will be produced.		
Action Item	Goal	Performance Measure	Schedule for Action
Evaluation of alternatives to the use of any mercury-containing equipment or materials	Minimize mercury where feasible within the WPCP	Evaluate feasibility and performance of alternatives	Incorporation of available mercury free alternatives as equipment or materials are replaced. Fluorescent lights have been evaluated and a formal plan for the entire plant has been designed. The plant budgeted strictly for replacement of lights each year.
Enforcement of activities	Although not required by the approved NPDES Permit and Pollutant Minimization Program, City Utilities will inspect all amalgam separators in City dental facilities by the EPA deadline of July 14, 2020. Additionally, the City will conduct random compliance inspection to ensure amalgam separates are operational.	Completion of inspections by the deadline and follow-on compliance inspections annually	Inspections are ongoing with more facilities installing separators
Other specific activities designed to reduce or eliminate mercury loadings.	Onsite visit during pretreatment inspections for SIUs. Mercury educational material will be distributed upon inspection.	Completion of inspections annually and information distributed	Ongoing annually
	Develop trace mercury content request letter	Letters mailed annually	Ongoing with each bulk chemical bid
	Bulb recycling for facility	Bulbs recycled as replaced	Ongoing

	Battery collection point for facility and employees	Batteries recycled following collection	Ongoing
Identification of facilities' responsibility	The WPCP has reviewed the responsibilities imposed by Public Law (P.L.) 225-2001 (codified at IC 13-20-17.5) upon the significant industrial users of the WPCP. WPCP will distribute information regarding these responsibilities to all significant industrial users as a part of the educational activities conducted under the PMPP.		

Part III.C

The following table provides a listing of planned activities designed to reduce or eliminate mercury loadings from the potential sources identified in Part II.C above.

Months 0-12	<p>During the previous permit cycles, the WPCP influent has shown lower levels of mercury in WPCP influent but the levels sometimes fluctuate relatively significantly. To gain an understanding of this fluctuation, sampling will concentrate on the interceptors feeding the WPCP.</p> <p>The five main interceptors flowing to the WPCP will each be sampled at points upstream of WPCP influent flows. Sampling will be conducted every 3 months during the SMV term.</p>
Months 13-60	Sampling of the five main interceptors will continue on a quarterly basis
The PMPP is based on the 5 – year permit cycle.	
The goal of the proposed interceptor sampling is to help identify the cause of fluctuating influent monitoring.	

Part III.D

City Utilities Staff and Resources
Required to Implement PMPP

The City commits to continue to provide the staff and resources necessary for the adequate implementation of the PMPP.

The minimum staffing dedicated to this PMPP consists of a City Utilities Core Team that meets bimonthly. The team consists of the following:

	2020 Personnel
WPC Plant Superintendent	1
WPC Plant Assistant Superintendent	1
WPC Pretreatment Manager	1
WPC Plant Supervisor of Maintenance	1
WPC Plant Industrial Pretreatment Coordinator	2
WPC Plant Chemist	3
Program Manager -Regulatory Compliance	1
Program Manager- Backflow and Compliance Assistance	1
WPC Plant Industrial Pretreatment Inspector	2