



**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) Sharon Tucker		
Title Mayor		
Address 200 East Berry Street		
City or Town Fort Wayne		
State IN	ZIP Code 46802	
Name of Primary Contact Person Chris Gach		
Address 2601 Dwenger Avenue		
City or Town Fort Wayne		
State IN	ZIP code 46803	Telephone No. 260-427-6053
E-mail Address (if available) chris.gach@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: 74 MGD		
Population Served: 264,000		
Number of Significant Industrial Users (as defined in 327 IAC 5-17-23): 32		

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 Chris Gach	Title WPCP Superintendent
Signature	Date Signed (month, day, year) 6/13/2025

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's (City's) 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 list of potential mercury sources is in Attachment IIB.

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. A copy of the purchasing language is in Attachment 2.

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 with the annually PMP report.

1. An interactive map was developed using ArcGIS. It plots the location of the following potential mercury discharge sites and are color coded by the type of business.
 - a. Dental Clinics
 - b. Hospitals
 - c. Medical Clinics
 - d. Nursing Homes
 - e. Veterinarians Veterinary Facilities
 - f. Heating Ventilation, Air Conditioning
 - g. General Industry
 - h. Automobile & Appliance Repair
 - i. High School, College
 - j. 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.

2. 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 discharges to evaluate the extent of mercury reduction.

The WPCP has identified the responsibilities imposed by IC 13-20-17.5 upon the significant industrial users of the WPCP. The WPCP communicates mercury outreach and awareness 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 detectable 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 activities is described below in Part III PMPP.

Part III PMPP Planned Activities.

PMPP Part III A & B Planned Activities

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 WPC Plant staff	WPC Plant employees participate in the City's online refresher mercury training annually. All training results are recorded.
An education program for the public within the service area of the WPCP	An education handout will be distributed to the residential and business sectors and will be included in a City Utilities bill 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.	Maintain current annual bill backer mailed, and outreach efforts, and website maintained. An educational slide show pertaining to mercury prevention airs on closed circuit TV in Citizens Square.	Outreach material will now be mailed to the superintendents of contract customers along with two different categories identified as potential mercury sources. Outreach material and website is reviewed annually. Bills mailed, outreach material handed out and web site visits are recorded annually.

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.
Enforcement of activities	City Utilities inspects amalgam separators in city dental facilities.	Dentists that are required to have amalgam separators, are inspected every other year. The list is divided in half and each year half the facilities are inspected, and the other half are inspected the next year.	Approximately 96 facilities with documented separators, 48 will be inspected each year. Inspections are ongoing and any new facilities are inspected and added to a list.
Other specific activities designed to reduce or eliminate mercury loadings.	Onsite visit during pretreatment inspections for SIUs	Completion of inspections annually	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 distributes information required by IC 13-20-17.5 to all significant industrial users as a part of the educational activities conducted under the PMPP.		

Months 0-24	<p>Although sampling results fluctuate monthly, WPCP influent during the previous permit demonstrated a generally decreasing trend of mercury entering WPCP.</p> <p>During the new permit cycle, the City intends to resample sites from the last two permit cycles which indicated higher levels than the background to evaluate if the levels have since decreased in those areas.</p>
Months 25-60	<p>For sample results identified in months 0-24 for higher results levels detected sampling will continue upstream to attempt to identify a source.</p>
<p>The PMPP is based on the 5 – year permit cycle.</p>	
<p>The goal of this sampling is to determine if high sources are still persistent in the collection system or if levels have lowered.</p>	

Attachment III.D

City Utilities Staff and Resources
Required to Implement PMPP

The City of Fort Wayne commits to providing the staff and resources necessary for the adequate implementation of the PMPP as provided.

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

	2025 Personnel
WPC Plant Superintendent	1
WPC Plant Operations Manager	1
WPC Pretreatment Manager	1
WPC Plant Supervisor of Maintenance	1
WPC Plant Industrial Pretreatment Coordinator	1
WPC Plant Dental Pretreatment Inspector	1
WPC Plant Chemist	3
Manager – Facilities Operations Compliance	1
WPC Plant Industrial Pretreatment Inspector	2
WPC Plant Materials Manager	1
Plant Clerk	1