

# Butler Wastewater - Mercury Pollutant Minimization Program Plan

## STREAMLINED MERCURY VARIANCE POLLUTANT MINIMIZATION PROGRAM PLAN (PMPP) (UPDATED JANUARY 2026)

### BACKGROUND

Butler's NPDES Permit (IN0022462), Part I.A.3-Table 4, effective November 1, 2022 (following Modification) and expiring on August 31, 2026, contains interim and final effluent limits for mercury as indicated in the following table.

#### NPDES Permit Requirements

	Quantity / Loading		Units	Quality / Concentration		Units	Monitoring Requirements	
	Monthly Average	Daily Maximum		Monthly Average	Daily Maximum		Measurement Frequency	Sample Type
Interim		Report	lbs/day		Report	ng/L	6 X Annually	Grab
Final	0.000022	0.000053	lbs/day	1.3	3.2	ng/L	6 X Annually	Grab

The Permit, Part I.A.4.a - Table 5, also requires that the influent wastewater be sampled for mercury at the same frequency as the effluent. The permit requires that mercury in the influent and effluent be sampled in February, April, June, August, October and December of each year.

A prior permit was modified (March 1, 2015) with the approval of a Streamlined Mercury Variance (SMV) and incorporation of the City's Pollutant Minimization Program Plan (PMPP). That modification expired on August 31, 2016. The PMPP was further updated and SMV renewal requests were submitted to the Indiana Department of Environmental Management (IDEM) in conjunction with the City's 2016 and 2021 NPDES Permit renewal applications. The City's current NPDES Permit includes the following related to the SMV:

- The SMV maintained the limits as noted in Table 1, above, and incorporated a water quality based effluent limit (WQBEL), Interim Discharge limits of "Report" for the Daily Maximum and a Monthly average at 2.4 ng/L.
- Footnote 5 to the WQBEL states ... *"Compliance with the interim discharge limit below will demonstrate compliance with the permit."*
- Footnote 6 states ... *"For the term of the NPDES permit, the permittee is subject to the interim discharge limit developed under the provisions of 327 IAC 5-3.5-8. Each reporting period (i.e., bi-monthly), the permittee shall report both a daily value and an annual average value for mercury. The annual average value is to be calculated as the average of daily values for mercury measured over the most recent (rolling) twelve-month period. Reporting of the annual average value for mercury is not required during the first year of the permit term. Compliance*

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*with the interim discharge limit will be achieved when the average of daily values measured over the most recent twelve-month period is less than the interim discharge limit.*

Data collected by the Butler Wastewater Utility for the period of 2021 through 2024 is summarized in the following table.

### Butler Wastewater Mercury Data (2021-2025)

2021	Feb	Apr	Jun	Aug	Oct	Dec	Average
<b>Influent (ng/L)</b>	68.8	14.3	11.2	6.36	17.5	22.3	23.41
<b>Effluent (ng/L)</b>	2.73	1.49	1.21	1.43	2.86	3.66	2.23

2022	Feb	Apr	Jun	Aug	Oct	Dec	Average
<b>Influent (ng/L)</b>	13.6	10.6	31.9	31.9	23.1	31.9	23.83333
<b>Effluent (ng/L)</b>	1.1	1.56	1.56	2.03	3.56	4.38	2.365

2023	Feb	Apr	Jun	Aug	Oct	Dec	Average
<b>Influent (ng/L)</b>	31.9	28.1	12.4	8.91	29.4	224	55.785
<b>Effluent (ng/L)</b>	9.1	1.46	3.99	2.77	1.03	2.69	3.506667

2024	Feb	Apr	Jun	Aug	Oct	Dec	Average
<b>Influent (ng/L)</b>	24.1	12.9	21.8	12.9	13.9	23.2	18.13333
<b>Effluent (ng/L)</b>	3.5	1.83	2.85	1.83	4.62	2.15	2.796667

2025	Feb	Apr	Jun	Aug	Oct	Dec	Average
<b>Influent (ng/L)</b>	11.7	11.6	23.4	19.9	N/A	N/A	16.65
<b>Effluent (ng/L)</b>	2.93	2.17	3.84	2.78	N/A	N/A	2.93

<b>Effluent Average (ng/L)</b>	2.765667
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<b>12 Month Rolling Average (ng/L)</b>	2.902857
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The Butler WWTP continues to utilize the activated sludge, single stage nitrification process to stabilize and remove carbonaceous and nitrogenous materials in the influent. This biological treatment process is not designed to treat / remove metals such as mercury, but mercury is adsorbed / absorbed by the active biomass in the process and accordingly, is removed coincidentally in the wasted biomass. The percent removal is calculated as the influent concentration minus the effluent concentration, divided by the influent concentration, times 100 or  $([In] - [Out] / [In] \times 100)$ .

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The average influent concentration, as indicated above, was 27.56 ng/L. The average effluent concentration was 2.76 ng/L. The average mercury "removed" through the treatment process is approximately ninety percent (90%).

A consideration for the wastewater operations is the effect of this coincidental removal on the wasted biomass (sludge) quality in relation to the federal and / or state sludge quality standards. Data collected for the most recent NPDES permit cycle (summarized in the following Table) by the Butler WWTP indicates that the mercury in Butler's waste biomass is not of regulatory concern with regard to the biomass / sludge.

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**Butler WWTP - Biomass / Waste Activated Sludge Data**

Sample Date	Digester 1 Wet	Digester 2 Wet	Digester 3 Wet	Table 1 Reg. Limit	Table 3 Reg. Limit	Digester 1 Dry	Digester 2 Dry	Digester 3 Dry
	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
3/23/2021	<0.3	<0.25	<0.027	57	17	<1.58	<0.998	<0.989
9/21/2021	<0.0242	0.0262	<0.0241	57	17	<0.599	0.556	<0.530
5/10/2022	<0.012	<0.014	<0.013	57	17	<1.54	<1.61	<1.53
11/1/2022	<0.020	<0.020	<0.0241	57	17	<0.019	<1.92	<2.0
6/20/2023	<0.023	<0.019	<0.034	57	17	<1.39	<1.04	<2.42
11/8/2023	<0.02	<0.02	<0.02	57	17	<0.235	<2.17	<2.60

**SOURCES OF MERCURY TO BUTLER WWTP**

One requirement of the SMV is to provide the results of an inventory of potential uses and sources of mercury in all buildings and departments and a plan and schedule for providing the department results of a complete inventory.

The inventory of potential uses and sources of mercury in all buildings and departments within the City of Butler indicates no significant uses or sources of mercury. The Butler WWTP does not accept septage, which can be a significant source of mercury. Butler completed a City-wide building / department inventory in July 2012, to identify light switches, light bulbs, thermostats, storage of old pesticides, etc., in each City Building that could be potential sources of mercury. This inventory was updated in the fall of 2014, in January 2021, and in December 2025. Butler began an ongoing effort in 2015 to replace fluorescent light fixtures and bulbs at the WWTP and Street Department facilities with non-ballasted light fixtures and LED bulbs.

The results of the most recent inventory are summarized in the following Table.

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### Inventory of City-Owned Buildings in Butler

(Updated 2025)

Department / Building	Light Switches	Thermostats	Light Bulbs	Other
Street Garage	0	3	Yes	0
Water / WTP	0	1	Yes	0
Wastewater / WWTP	0	4	Yes	0
Administration / City Offices	0	0	Yes	0
Police Station	0	0	Yes	0

The Butler wastewater system is comprised of approximately sixty-four percent (64%) combined sewers which, during periods of wet weather, transport a significant volume of stormwater resulting from inflow and infiltration (I/I). This stormwater transports airborne mercury that has deposited on the surface during precipitation events and is believed to be a major source of mercury into Big Run Ditch and Butler's influent wastewater. As previously noted, Butler attempted to determine the airborne mercury contribution from precipitation and runoff and determined that it was difficult and outside the scope of the permit related sample collection. No further data collection efforts to determine the mercury concentration in the precipitation / runoff have been attempted.

In addition, the following inventory of potential mercury sources within the sewer service area was completed in 2012, updated in 2014, 2021, and in 2024.

#### Medical Facilities

- Hospitals - None in Butler
- Clinics - Butler Clinic (dba DeKalb Health), 409 East Washington Street, Butler, IN 46721 - Fluorescent light bulbs are properly disposed at an Auburn facility
- Nursing home(s) - Laurels of DeKalb, 520 West Liberty Street, Butler, IN 46721 – They transitioned to mercury free light bulbs; have no thermometers containing mercury; blood pressure monitoring equipment is mercury free
- Veterinary facility / Veterinary office - None in Butler
- DeKalb County EMS (located at Butler VFD Station), 700 West Main Street, Butler, IN 46721 – Building was new in 2012; no mercury switches or fluorescent light bulbs; no medical equipment with mercury; no chemicals with mercury

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### Dental Clinic / Dentist Office

- Butler Dental Group – 106 East Green Street, Butler, IN 46721 – An Office visit occurred in January 2021 because of a change in ownership and practicing Dentist, and the Office visit indicated that ADA Mercury Guidelines are followed.

### Public / Private Educational Laboratories

- Eastern DeKalb Schools - Junior and Senior HSs, 300 East Washington Street, Butler, IN 46721 - Sanitary wastewater only; digital thermometers; computers, monitors and light bulbs continue to be a component of their recycling program

### Industry - Non SIUs

Name	Address	Discharge Note(s)
ThermaTru	601 Re Jones Road, Butler, IN 46721	sanitary only
International Paper (formerly Tri Wall)	2626 CR 71, Butler, IN 46721	sanitary only
MultiMatic (formerly Pullman Industries)	201 Re Jones Road, Butler, IN 46721	sanitary only
Color Master	801 South Broadway, Butler, IN 46721	sanitary only
Service Steel Framing	206 Depot Street, Butler, IN 46721	sanitary only
Air Products	4590 CR 59, Butler, IN 46721	sanitary only
Hendrickson Trucking	201 Cherry Street, Butler, In 46721	sanitary only
Celadon (formerly Evans) Trucking	685 East Main Street, Butler, IN 46721	sanitary only
Magic Coil	4143 CR 61, Butler, IN 46721	sanitary only
Paragon Steel Enterprises	4211 CR 61, Butler, IN 46721	sanitary only
New Process Steel	4258 CR 61, Butler, IN 46721	sanitary only
DeKalb Molded Plastics	550 West Main Street, Butler, IN 46721	sanitary only

### SIUs – With Discharge Permits

Name	Address	Discharge Note(s)
Steel Dynamics, Inc.	4500 CR 59, Butler, IN 46721	Hg Not ID'd in Discharge
Heidtman Steel, Inc.	4400 CR 59, Butler, IN 46721	Hg Not ID'd in Discharge

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### **Other potentially significant sources of residential / retail contributions of mercury**

- Heating, Ventilation, and Air Conditioning contractors - None in Butler
- Automobile and appliance repair - Brent's Automotive Repair, 503 South Broadway, Butler, IN 46721 – Discontinued use of fluorescent bulbs; recycle batteries
- No appliance repair in Butler
- Others - there are no printers, pottery or ceramics businesses; or other potential dischargers
- Sediment in Butler sewers - The Butler WW staff cleaned twenty-seven percent (27%) of the City's 91,600 feet of sewers in 2020. This effort is ongoing, with an annual goal identified in the City's approved CSO Operating Plan at twenty-five percent (25%) of the sewers to be cleaned annually. The main interceptor sewer to the WWTP is a 60-inch diameter sewer running from just east of Broadway Street under US 6 (Main Street) to a CSO Outfall discharge point east of the WWTP at the Big Run Creek Bridge on US 6. Manhole 7, about 50-feet west of the Norfolk Southern RR tracks, contains a CSO weir that allows extreme wet weather flows to discharge to the CSO Outfall (NPDES Permitted Outfall 003). This weir acts as a dam that allows sediment deposition at the weir and upstream several hundred feet west of the weir. Special, contracted cleaning service was retained in 2015 to clean this interceptor because of its depth and size. The City repeated this cleaning in 2021 and plans to repeat every four (4) years thereafter.

### **Identification of Known Mercury-Bearing Equipment, Wastestreams, and Mercury Storage Sites.**

There are no known or identified mercury storage sites in Butler or the service area of the Butler wastewater system. As identified above, the primary source (wastestream) of mercury into the Butler wastewater system is believed to be from airborne sources that reach Butler's wastewater system when there is precipitation and stormwater inflow and infiltration (I/I). There are no identified equipment or components containing mercury at the Butler WWTP, verified as part of the City-wide inventory completed in 2012 / 2014 that could enter a drain and the Butler sewers.

### **Activities To Be Conducted to Eliminate or Minimize the Release of Mercury to the Water, Considering the Technical and Economic Feasibility of Each, Include the Following:**

- **A review of purchasing policies and procedures, including mercury free products** – The Board of Public Works and Safety adopted an "Environmental / Green Purchasing Policy" to better ensure that environmental protection, including the purchase of mercury free products, is an ongoing activity. This Policy was adopted at the Board's October 6, 2014 meeting. The City's Clerk Treasurer and Department Heads follow this procedure to the extent possible.

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- **Necessary training and awareness for facility staff** – All WWTP staff and City Department Supervisors (Water, Wastewater, Streets and Parks) received training in May 2024. The training focused on developing an awareness of what mercury in the environment was about, environmentally conscious purchasing and proper disposal of mercury containing devices as a component of the City’s pollution prevention program.
- **Evaluation of alternatives to the use of any mercury-containing equipment or materials** – This activity was incorporated into the City’s purchasing policy and is a component of the training provided to Wastewater / City personnel. The Pretreatment Coordinator will review this on an annual basis.

### **Other Specific Activities Designed To Reduce Or Eliminate Mercury Loadings.**

- The Interceptor Sewer under US 6 was cleaned in 2021 to remove accumulated sediment. As stated previously, the interceptor will be scheduled for cleaning on a four (4) year basis.
- Sewer separation (as a component of the CSO LTCP) to remove I/I sources from combined sewers will continue as funds are available. The City submitted a CSO LTCP Compliance Plan (CP) to IDEM per an Agreed Order in May 2014. That CP was approved in September 2014. The City completed design of the infrastructure improvements approved in the CP and construction of those improvements was initiated in April 2021 and is currently in the substantially complete phase. These improvements expand the capability at the WWTP to further reduce CSO events. In addition, the project includes the conversion from chlorination as a disinfection process to ultraviolet light disinfection.

### **Identification of the Facility's Responsibilities under P.L.225-2001 (Also Known As House Enrolled Act 1901 Of The 2001 Legislative Session).**

This is more fully described in a subsequent section of the PMPP. In summary, the City will continue to work with the NE Indiana Solid Waste District to develop and implement programs to ensure that elements of the PMPP are addressed.

The following will be reviewed annually with regard to the activities above.

- A. The goal to be accomplished
- B. A measure of performance
- C. A schedule for action

### **MERCURY MONITORING DATA**

All available mercury monitoring data and information on mercury in biosolids, as required by the City's NPDES permit, has been described above.

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### RESOURCES AND STAFF

The existing resources and staff of the Butler Wastewater Department will continue to complete all actions necessary for the ongoing implementation of this PMPP. Additional resources for sample collection and analyses will be from the Department's annual operations budget and no new funds are believed necessary for those expenses. The activities described in this document will be monitored by the Wastewater Department's Superintendent / Pretreatment Coordinator.

### PUBLIC NOTIFICATION

A notice was published announcing the availability of this update and the intent to seek a renewal of the SMV, as a component of the renewal of the City's NPDES Permit, by the Clerk Treasurer's Office. Proof of that publication is appended to this document.

### REPORTS

#### PL 225-2001 RESPONSIBILITIES

Butler, in cooperation and with the support of IDEM and the NE Indiana Solid Waste Management District, under P.L.225-2001, will provide information for the public regarding the reuse and recycling of, or independently implement collection programs for, mercury commodities and mercury-added products.

Specifically, the City has done / will continue to do or will initiate the following.

- Provide informational brochures at the "education" rack in City Hall
- Provide information and outreach to the Wastewater Utility Customers about the proper collection, and disposal of waste materials that could contain mercury, using the City's Web Site
- Sponsor a City-wide Clean Up Day and focus on the proper collection and disposal of:
  - Thermometers that contain mercury
  - Fluorescent light bulbs
  - Electronic equipment and components
- Work with the NE Indiana Solid Waste Management District to coordinate a "Tox-Away" / Household Hazardous Waste collection and disposal Day in conjunction with the City-wide Clean Up Day
- Waste Accepted as Part of Mercury PMPP – The Wastewater Department, assisted by the Street Department, will collect the following and pay the Northeast Indiana SWD to properly manage and dispose of the materials collected.
  - Televisions
  - Microwaves

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- Computer Monitors
- CPUs
- Paint
- Batteries
- Fluorescent Light Bulbs
  - 8-Ft. Bulbs
  - 4-ft. Bulbs

### **PLANNED ACTIVITIES**

A list of planned activities designed to reduce or eliminate mercury loadings from the sources identified in subdivision (1). For each activity specified:

The goal(s) to be accomplished

- Manage the efforts underway and implement the identified activities to prevent, reduce and / or minimize potential sources of mercury discharges to the Butler wastewater system.
- Educate and make users (residential, commercial, institutional and industrial) aware of the City's efforts and what they can do to help prevent, reduce and / or minimize discharges of mercury into the City's wastewater system.

Measure(s) of performance

- (A) The ongoing monitoring and data collection will be used as the primary indicator to assess the effectiveness of the planned activities.
- (B) A secondary indicator will be the data and information collected during the planned activities, such as the City Clean Up / "Tox Away" Day.
- (C) A schedule for action – This PMPP is being continuously implemented. The detailed schedules (and current status) for the actions described are detailed in Part Two D and Parts 3 A, B and C of the SMV Application, which are contained in Attachments 5 and 6 to this PMPP.

### **EDUCATION PROGRAM**

Employees – Training, as previously noted, will be provided after SMV / NPDES Permit is renewed. Updates will be provided on an annual basis.

Public – A "Mercury Fact Sheet" will continue to be posted in the City Hall and made available to citizens of Butler, upon request. This information will also be posted on the City's web site. Quarterly updates are planned after receipt of the SMV and permit renewal. Notice of the City's Clean-up Day will be issued at least 1 month in advance of the Day.

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Prior to submitting the PMPP to IDEM as part of the SMV application, an applicant shall do the following:

Publish notice of the availability of the draft PMPP in a daily or weekly newspaper of general circulation throughout the area affected by the discharge.

(2) Post a copy of the information required by this section at the following:

- Principal office of the municipality or political subdivision affected by the facility or discharge.
- The United States post office.
- If one is available, the library serving those premises.

**PUBLIC NOTICE INFORMATION**

**FOR IMMEDIATE RELEASE**

**INTENT TO APPLY FOR A STREAMLINED MERCURY VARIANCE AND SUBMISSION  
OF A POLLUTANT MINIMIZATION PROGRAM PLAN FOR MERCURY**

- (1) **Name of Streamlined Mercury Variance (SMV) and Pollutant Minimization Program Plan (PMPP) Applicant:** Gavyn Aden, Superintendent, Butler Wastewater, 695 East Green Street, Butler, IN 46721
- (2) **Purpose of Pollutant Minimization Program Plan (PMPP):** The PMPP is to reduce, if and where possible, sources of mercury into the Butler wastewater system.
- (3) **Description of the activities or operations that result in the discharge for which an SMV is being requested:** The Butler WWTP's NPDES Permit was effective November 1, 2022 and included the incorporation of the SMV and PMPP. The Butler WWTP effluent averaged 2.76 ng/l (nanograms per liter / parts per trillion) of mercury from 2021-2025. The daily maximum limit in the NPDES Permit is 3.2 ng/L. The average daily maximum is also used to determine the monthly average since only one (1) grab sample is collected once every other month. The monthly average limit in the NPDES permit is 1.3 ng/L. The permit requires Butler to:
  - a. monitor and report, six (6) times per year, the daily maximum mercury result; and
  - b. meet a water quality based effluent limit of 2.4 ng/L, based on a twelve (12) month rolling average.
- (4) **Purpose of this notice and the comment procedures:** This notice is to allow citizens and potentially affected parties the opportunity to provide comment on Butler's intent to request a renewal of the SMV, as a component of the renewal of the Butler NPDES Permit, and to comment on Butler's updated Pollutant Minimization Program Plan for Mercury.
- (5) The January 2026 PMPP Update is available for review and comment online at the Butler City web page. The document is also available at the Butler Library.
- (6) Contact person, mailing address / internet address and telephone number where interested persons may obtain additional information and a copy of the PMPP: **Contact Gavyn Aden at the Butler WWTP, 695 East Green Street, Butler, IN 46721 (wwtpsupt@cityofbutler.in.gov); WWTP Phone: 260-868-2805**

### Butler's Public Notices

- A notice was issued by the Butler Clerk Treasurer, per the requirements of the “streamlined mercury variance application requirements.”
- The notices appeared in “The Star”, a publication of the KPC Media Group.
- The comment period was for 30 days.
- The Proof of Publication forms are in Attachment 1.
- The “Mercury Pollutant Minimization Program Plan” was also available for public review at the:
  - Butler Public Library
  - Butler Wastewater Treatment Plant
  - City of Butler Website

**ATTACHMENTS**

- 1. Proof of Publication of Public Notice(s)**
  
- 2. Schedule of Activities – SMV Application Part Two D**
  
- 3. Schedule of Activities – SMV Application Parts Three A, B and C**
  
- 4. Historical Mercury Data**

**Attachment #1**

**Proof of Publication of Public Notice(s)**

# Butler Wastewater - Mercury Pollutant Minimization Program Plan

## ATTACHMENT #2

### Schedule of Activities – SMV Application Part Two D

#### Municipal Streamlined Mercury Variance Application

#### Part Two. D

#### Plan / Schedule for Completion of the Evaluation Identified in Part Two. C

Sector	Planned Activity	Goal	Measure of Performance	Schedule of Action(s)	Status January 2025
Medical Facilities	Obtain and distribute AHA BMP Literature	Prevention, Education and Awareness	Verification of mailing and content	Update information w/in 6 months after permit renewal	To be completed
	Annual follow-up with each identified facility	Prevention, Education and Awareness	Incorporation / verification in annual report		
Dental Clinics / Offices	Obtain and distribute ADA BMP Literature	Prevention, Education and Awareness	Verification of mailing and content	Update information w/in 6 months after permit renewal	To be completed
	Annual follow-up with each identified facility	Prevention, Education and Awareness	Incorporation / verification in annual report		
Public / Private Educational Labs	Obtain and distribute BMP Literature	Prevention, Education and Awareness	Verification of mailing and content	Verify that school efforts are continuing w/in 3 months after permit renewal	Ongoing
	Annual follow-up with each identified facility	Prevention, Education and Awareness	Incorporation / verification in annual report		
General Industry / SIUs	Incorporate into annual pretreatment inspection for SIUs	Prevention, Education and Awareness	Incorporation / verification in annual pretreatment report		Ongoing
	Incorporate into bi-annual review of all SIUs / non-SIUs	Prevention, Education and Awareness	Incorporate mercury inventory into IU Questionnaire / IWP Application		To be completed in 2016 inspections and annually thereafter

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<p>Other Potentially Significant Sources (Including the Wastewater Utility and all Butler Municipal Functions)</p>	<p>Public education and outreach - Distribute literature and information to residents and other establishments</p> <p>Clean 25% of Utility Sewers Annually</p> <p>Clean Interceptor Sewer under US 6</p> <p>Bi-Annual Inventory Review of all Municipal Buildings</p> <p>Training for City employees Annual update and training for new employees</p> <p>Review and evaluation of City purchasing policy and all purchases; develop SOP to include review of mercury components in all City purchases</p> <p>Evaluation of equipment / alternative equipment need to provide City services</p>	<p>Prevention, Reduction, Education and Awareness</p> <p>Prevention and Reduction</p> <p>Prevention and Reduction</p> <p>Prevention, Reduction, Education and Awareness</p> <p>Prevention, Reduction, Minimization of Mercury in Components and potential discharges</p>	<p>Verification of distribution; Web site monitoring; Dates distributed</p> <p>Incorporate as part of annual pretreatment report</p> <p>Incorporate as part of annual pretreatment report</p> <p>Incorporate as part of annual pretreatment report</p> <p>Policy adopted in 2014; verify annual review of policy and purchases</p> <p>Department Participation</p> <p>Department Participation</p>	<p>3 months after Permit renewal/ SMV applicability</p> <p>12 months after Permit renewal / SMV applicability</p> <p>3 months after Permit renewal / SMV applicability and every 48 months</p> <p>By 9/30 of even numbered years;</p> <p>By 9/30 of each year; include in annual reports</p> <p>6 months after Permit renewal / SMV applicability</p> <p>Ongoing</p>	<p>Update Fact sheet and CFC info</p> <p>Annual report to Board of Works by 12/31 of each year</p> <p>Annual report to Board of Works by 12/31 of each year</p> <p>2022 and subsequent even numbered years</p> <p>Annually, in Report</p> <p>Implemented by WW Dept.; Clerk Treasurer verification annually to Pretreatment Coordinator</p> <p>Ongoing</p>
<p>PL 225-2001</p>	<p>Public Education and Outreach</p> <p>Clean Up Day – coordinate collection of mercury containing materials (thermometers, light bulbs, electronics, batteries) with NE Indiana SWD</p> <p>Coordinate efforts with NE Indiana SWD and other NE Indiana municipalities for “Tox Away” Day(s)</p>	<p>Prevention, Reduction, Education and Awareness</p> <p>Prevention, Reduction, Education and Awareness</p> <p>Prevention, Reduction, Education and Awareness</p>	<p>Verification of distribution; Web site monitoring; Dates distributed</p> <p>Inventory of Materials Collected</p> <p>Verification of participation and coordination</p>	<p>6 months after Permit renewal / SMV applicability and quarterly thereafter Annually</p> <p>Include verification of participation in annual pretreatment report in 2016 and annually thereafter</p>	<p>Ongoing</p> <p>Incorporate information into Annual Pretreatment Report</p> <p>Ongoing</p>

# Butler Wastewater - Mercury Pollutant Minimization Program Plan

## ATTACHMENT #3

### Schedule of Activities – SMV Application Parts Three A, B and C

#### Municipal Streamlined Mercury Variance Application

#### Parts Three. A, B and C

#### Mercury Pollutant Minimization Program Plan

#### Planned Activities to Eliminate or Minimize the Release of Mercury

Activity	Goal	Measure of Performance	Schedule	Status – January 2025
1. Review of Purchasing Policies and Procedures (In addition to activities identified in Part Two. D)	Prevention, Reduction, Minimization and Education	Implementation of Policy adopted by Board of Public Works and Safety on 10/6/14	Implementation was initiated on 10/13/14  Environmental / Green Purchasing Policy will be reviewed annually, by 9/31 of each year	Ongoing
2. Training and Awareness for Staff, including Education (In addition to activities identified in Part Two. D)	Prevention, Reduction, Minimization, Education and Awareness	Verification of employee training – initial and subsequent events	Initial training was conducted on 10/13/14  Follow-up training will occur within 1 month of effective date of SMV / permit renewal  After 1 <sup>st</sup> follow-up training, permit requirements will be reviewed and discussed annually with all Departments	Done  Done; will be completed within COVID limitations  By 3/1 of each year; verification in annual pretreatment report
3. Education Program for the Public (In addition to activities identified in Part Two. D)	Prevention, Reduction, Minimization, Education and Awareness	Verification of provision of information on City web site and information / education rack in City Hall	4 months after Permit renewal / SMV applicability  Review and update information every 3 months thereafter  Information about Butler Clean-up Day 1 month before planned event each year	Info on CFCs and Demo distributed  Need to be more proactive in placing info on web site To be done every year
4. Evaluation of Alternatives to the Use of Equipment Containing Mercury (In addition to activities identified in Part Two. D)	Prevention, Reduction, Minimization and Education	Implementation of Environmental / Green Purchasing Policy and annual review verified in Pretreatment Program Report	Ongoing; annual pretreatment program report	Done – In Annual Pretreatment Program Report
5. Other Activities to Reduce or Eliminate Mercury Loadings (In addition to activities identified in Part Two. D)	Prevention, Reduction and Minimization	Monthly tracking of sewer cleaning; incorporate into annual pretreatment program report  Review of Municipal Buildings and progress to eliminate / manage mercury containing equipment	Ongoing  12 months after Permit renewal and SMV applicability; annually thereafter	Approximately 5,000 ft of sewer cleaned in 2025  In Pretreatment Report
6. Responsibilities Under PL 225-2001 (In addition to activities identified in Part Two. D)	Prevention, Reduction, Minimization, Education and Awareness	Documented coordination with NE Indiana SWD  Annual summation of materials collected during Clean-up Day and any “Tox Away” Days	Clean UP Day within 12 months after effective date of Permit renewal / SMV applicability  Annually thereafter	Annual Pretreatment Report