

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
FAX 608-267-3579
TTY Access via relay - 711



Ms. Tinka Hyde, Director, Water Division
U.S. EPA, Region 5
77 W. Jackson
Chicago, IL 60604

Subject: Certification Statement for Approval of a Variance to Water Quality Standards
City of Waupaca; WPDES Permit WI-0030490-07

Dear Ms. Hyde:

The Wisconsin Department of Natural Resources has made a final decision under Wis. Stat. s. 283.15 (4) to approve a variance to the water quality standard for mercury at the above-named facility. This decision is subject to judicial review pursuant to Wis. Stat. ss. 283.15(4)(d) and 227.52. Although the Department has issued a final decision on the mercury variance, including the permit terms and conditions of the variance, the Department recognizes that the mercury variance and related permit conditions may not be included in the final reissued WPDES permit until EPA has approved the variance.

Pursuant to §§ 40 CFR Part 131.21 and 131.6, the Department must submit a certification statement to EPA for each variance approved in the state. The statement must certify that the variance to a water quality standard was approved in accordance with state law.

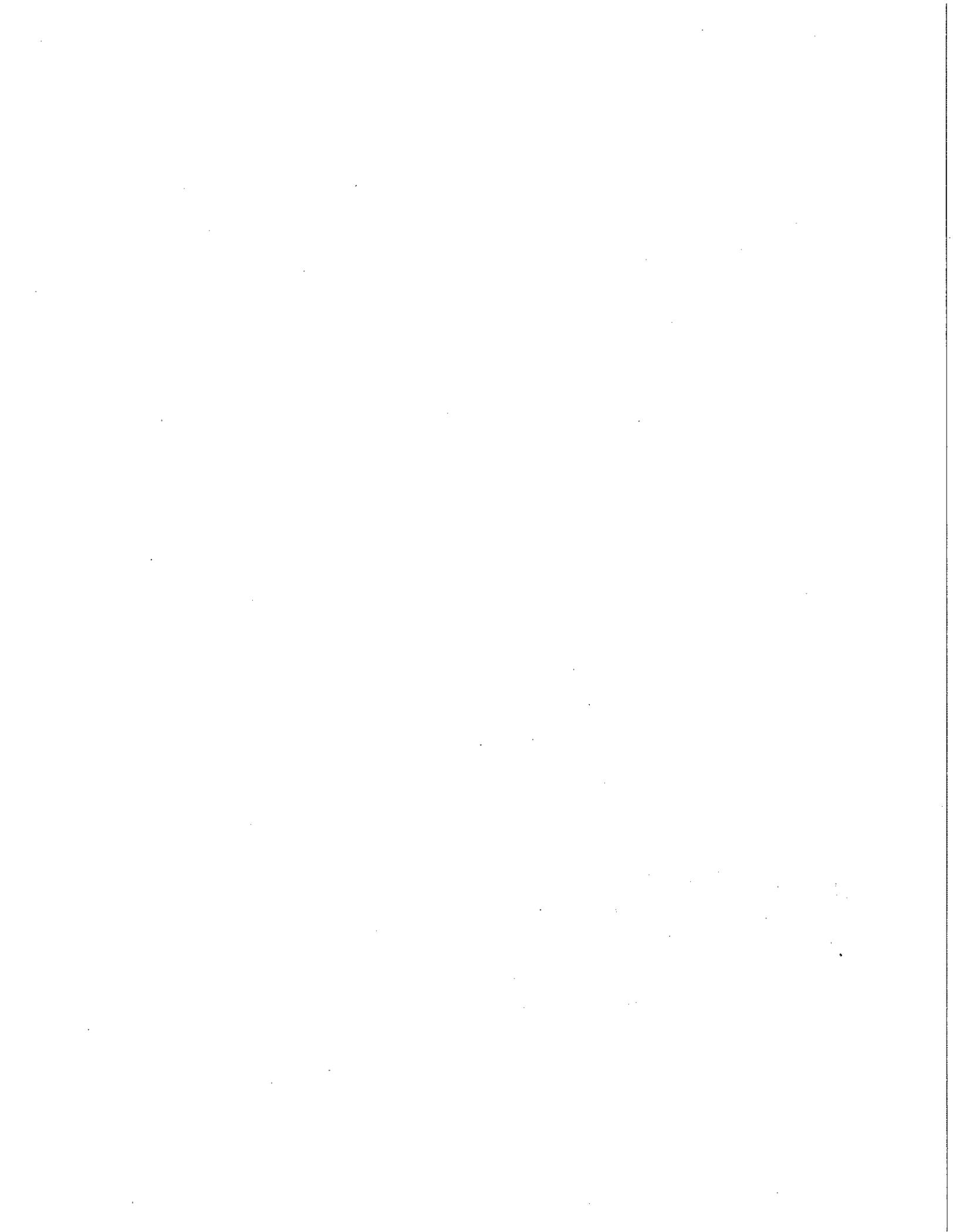
Accordingly, I hereby certify that the mercury variance was reviewed and approved by Department staff in accordance with procedures in subchapter III of chapter NR 106, Wis. Adm. Code. The application for this variance was submitted on June 23, 2010 and the department public noticed its intent to reissue the permit and grant the mercury variance on February 6, 2014 in accordance with Wis. Stat. §§ 283.15(3) and 283.39.

If you have any questions regarding the variance approval, please contact Richard Sachs at 920-662-5176.

Sincerely,


Timothy A. Andryk
Chief Legal Counsel

DATED IN MADISON: April 10, 2014



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Ms. Tinka Hyde, Director, Water Division
U.S. EPA, Region 5
77 W. Jackson
Chicago, IL 60604

Subject: Request for Approval of a Variance from Water Quality Standards for Mercury
Receiving Stream: Waupaca River in Waupaca County
Permittee: City of Waupaca Wastewater Treatment Facility
WPDES Permit No. WI-0030490-07

Dear Ms. Hyde:

In accordance with § 283.15 of the Wisconsin Statutes and Title 40, Part 131 of the Code of Federal Regulations, the Department requests U.S. EPA, Region 5 to approve a water quality standards variance for the above-referenced discharge. The water quality criterion for which the permittee is seeking a variance is contained in chapter NR 105, Wisconsin Administrative Code.

To assist your staff during their review, relevant background information pertaining to this variance is attached to this letter. The draft permit and variance were publicly noticed on February 6, 2014. The comment period has now ended. No comments were received on the draft permit relating to the proposed variance.

We are committed to working with the permittee during the term of this variance to find a solution that will lead toward full compliance with the applicable water quality standard. Conditions on the variance, which are included in the WPDES permit, specify actions to be taken by the permittee and timetables for those actions. If the variance is approved by EPA, the Department will include the variance limitation and related conditions in the final WPDES permit.

We appreciate your consideration of this request. Should you have further questions regarding this matter, please contact Richard Sachs at 920-662-5176.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kenneth G. Johnson'. The signature is written in a cursive style with a long, sweeping underline.

Kenneth G. Johnson, Administrator
Water Division

DATED: 4/10/2014

Attachment
e-cc

Susan Sylvester - WY/3
David Pfeifer - EPA, Region 5
Diane Figiel - WY/3

Richard Sachs - NER/Green Bay
Brian Weigel, Water Evaluation - WY/3
Robin Nyffeler - LS/8

BACKGROUND INFORMATION REGARDING WATER QUALITY STANDARDS VARIANCE

Receiving Stream and Classification: **Waupaca River, fish and aquatic life classification**

Water Quality Based Effluent Limit: **1.3 ng/L as a monthly average**

Existing Permit Limit: **no limit**

Permit Limit Based on Proposed Variance: **4.9 ng/L as a daily maximum**

Duration of Variance: **From the date of permit reissuance through the proposed permit expiration date of June 30, 2019 the limit of 4.9 ng/L would be in effect as a variance limit**

Department Rationale for Approving Variance:

S. NR 106.145, Wis. Adm. Code, outlines findings that justify expediting variances mercury. The Department intended that this provision be generally applicable to municipal and industrial dischargers, which produce large volumes of effluent with already extremely low mercury concentrations. More specifically:

- a) The Department considers treating these large volumes to produce effluent that reliably meets the water quality-based effluent limit to be prohibitively expensive. See Section VII of the Facility Specific Standard Variance Data Sheet for clarification.
- b) At the time of promulgation of s. NR 106.145 in October 2002, data on mercury concentrations in wastewater effluents were generally not available. However, after the promulgation of EPA Method 1631, and beginning in 2004, the permittee began generating low-level mercury data on samples of its effluent, showing that although the facility is properly operated and maintained, the WQBELs are not being consistently achieved. Appropriate mercury source reduction activities are environmentally preferable to wastewater treatment technology in many cases because wastewater treatment for mercury produces a sludge or other resultant wastewater stream that can be as much or more of an environmental liability than the untreated effluent.

The Department concludes that the applicant has met the requirements of Subchapter VII of ch. NR 106, Wis. Adm. Code, and s. 283.15, Wis. Stats. The Department further concludes that requiring the applicant to meet the water quality standard for mercury at this time would result in substantial and widespread adverse social and economic impacts. The Department therefore proposes to grant the variance for mercury.

Conditions to be Included in WPDES Permit: **See Attached Draft Permit being sent to EPA in Electronic Format**

Attachments:

**Facility Specific Standard Variance Data Sheet
Certification from DNR Chief Legal Council**

Facility Specific Standard Variance Data Sheet

Directions: Please complete this form electronically. Record information in the space provided. Select checkboxes by double clicking on them. Do not delete or alter any fields. For citations, include page number and section if applicable. Please ensure that all data requested are included and as complete as possible. Attach additional sheets if needed.

Section I: General Information

A. Name of Permittee: City of Waupaca

B. Facility Name: City of Waupaca Wastewater Treatment Facility

C. Submitted by: Wisconsin Department of Natural Resources

D. State: Wisconsin **Substance:** Mercury **Date completed:** April 7, 2014

E. Permit #: WI-0030490-07 **WQSTS #:** (EPA USE ONLY)

F. Duration of Variance **Start Date:** July 1, 2014 **End Date:** June 30, 2019

G. Date of Variance Application: June 23, 2010

H. Is this permit a: First time submittal for variance
 Renewal of a previous submittal for variance (Complete Section X)

I. Description of proposed variance:

The Waupaca Wastewater Treatment Facility (WWTF) discharges to the Waupaca River in Waupaca County. The permittee is not able to consistently comply with the water quality based effluent limit (WQBEL) for mercury. The City of Waupaca seeks a variance to the water quality standard for mercury for its WWTF.

An alternative mercury effluent limitation under s. 106.145, Wisconsin Administrative Code represents a variance to water quality standards authorized by s. 283.15, Wis. Stats. The Department concludes that the City of Waupaca has met the requirements of s. NR 106.145, Wisconsin Administrative Code and s. 283.15, Wisconsin Statutes. The Department further concludes that requiring the City of Waupaca to meet the water quality standard for mercury would result in substantial and widespread adverse social and economic impacts in its service area. The Department proposes a variance to the water quality standards for wildlife and human threshold.

Citation: An alternative mercury effluent limitation under s. 106.145, Wis. Adm. Code represents a variance to water quality standards authorized by s. 283.15, Wis. Stats.

J. List of all who assisted in the compilation of data for this form

Name	Email	Phone	Contribution
Richard Sachs	richard.sachs@wi.gov	920-662-5176	Permit Drafter
Mark Corbett	mark.corbett@wi.gov	920-424-4403	Wastewater Engineer

Section II: Criteria and Variance Information

A. Water Quality Standard from which variance is sought: 1.3 ng/L Wildlife Criterion

B. List other criteria likely to be affected by variance: 1.5 ng/L Human Threshold Criterion

Source of Substance: DNR assumes that the majority of the mercury in the wastewater is from legacy contamination of the wastewater collection system. With regard to current, continuing sources of mercury, DNR assumes that dental facilities are the most significant sources with contributions from medical facilities, industries, schools and domestic sources.

C. Ambient Substance Concentration: 2.3 – 3.0 ng/L Measured Estimated
 Default Unknown

D. If measured or estimated, what was the basis? Include citation.

The permittee conducted daily monitoring of the Waupaca River, at a site approximately 1 mile upstream of the Waupaca WWTF outfall, from August 21-23, 2012 (under normal river flow conditions). The mercury concentration of those three grab samples was measured at 2.7, 2.3 and 3.0 ng/L, respectively. These samples were collected in accordance with the procedures for low-level mercury sampling (“clean hands – dirty hands”), and the associated field blank results (one field blank was collected each day) indicated that the samples were not

contaminated with mercury through the act of sampling. These results are consistent with others from across the state which indicate that mercury concentrations of many surface waters exceed the 1.3 ng/L wildlife criterion.	
E. Average effluent discharge rate: 0.97MGD (12/20808)	Maximum effluent discharge rate: 1.54MGD (8/2011)
F. Effluent Mercury Concentration: <u>2.37ng/l (avg. of 30 results)</u>	<input checked="" type="checkbox"/> Measured <input type="checkbox"/> Estimated <input type="checkbox"/> Default <input type="checkbox"/> Unknown
H. If measured or estimated, what was the basis? The Effluent Mercury Concentration of 2.37ng/l is the average of 30 measured sample results between June 2006 and July 2013.	
I. Level currently achievable (LCA): <u>4.9ng/L</u>	Variance Limit: <u>4.9 ng/L</u>
J. What data were used to calculate the LCA, and how was the LCA derived? Between June, 2006 and July, 2013 a total of 30 Quarterly, effluent Grab samples were analyzed. Concentrations ranged from No Detect (0.25ng/l) to 4.7ng/L Total Recoverable Mercury. Citation: s. NR 106.145(5), Wis. Adm. Code.	
K. Explain the basis used to determine the variance limit (which must be \leq LCA). Include citation. The variance limit = 1 Day P99. The limit is established in accordance with s. NR 106.145(5), Wis. Adm. Code.	
L. Select all factors applicable as the basis for the variance provided <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input checked="" type="checkbox"/> 6 under 40 CFR 131.10(g). Summarize justification below:	
Section NR 106.145(1), Wis. Adm. Code, outlines several findings that justify variances for mercury. The Department intended that this provision be generally applicable to all dischargers of mercury, which produce large volumes of effluent with already extremely low mercury concentrations. The Department considers treating these large volumes to produce effluent with even lower concentrations to be technically and economically infeasible. Citation: Assessing the Economic Impacts of the Proposed Ohio EPA Water Rules on the Ohio Economy, April 24, 1997, Ohio Environmental Protection Agency, Division of Surface Water and Foster Wheeler Environmental Corporation and DRI/McGraw-Hill in support of Amended and New Rules in OAC Chapters 3745-1, -2, and -33.	
Section III: Location Information	
A. Counties in which water quality is potentially impacted: <u>Waupaca County</u>	
B. Receiving waterbody at discharge point: <u>Waupaca River</u>	
C. Flows into which stream/river? <u>Wolf River</u> How many miles downstream? <u>~19</u>	
D. Coordinates of discharge point (UTM or Lat/Long): <u>44° 21' 16" N Latitude, 89° 4' 31" W Longitude</u>	
E. What are the designated uses associated with this waterbody? The Waupaca River is designated for fish and aquatic life (warm water sport fish community classification) and recreational uses.	
F. What is the distance from the point of discharge to the point downstream where the concentration of the substance falls to less than or equal to the chronic criterion of the substance for aquatic life protection? The ambient condition is above the wildlife criterion of 1.3 ng/L, so it is not expected that the limit will be achievable at or near the discharge point.	
G. Provide the equation used to calculate that distance (Include definitions of all variables, identify the values used for the clarification, and include citation): See above.	
H. Identify all other variance permittees for the same substance which discharge to the same stream, river, or waterbody in a location where the effects of the combined variances would have an additive effect on the waterbody: There are no other permittees with mercury variances that discharge to the Waupaca River, or to the Tomorrow River (as the river is known upstream in Portage County).	
Please attach a map, photographs, or a simple schematic showing the location of the discharge point as well as all variances for the substance currently draining to this waterbody on a separate sheet. See attachment: Waupaca River map	
I. Is the receiving waterbody on the CWA 303(d) list? If yes, please list the impairments below. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown	

Section IV: Public Notice

- A. Has a public notice been given for this proposed variance? Yes No
- B. If yes, was a public hearing held as well? Yes No N/A
- C. What type of notice was given? Notice of variance included in notice for permit
 Separate notice of variance
- D. Date of public notice: February 6, 2014 Date of hearing: _____
- E. Were comments received from the public in regards to this notice or hearing? (If yes, please attach on a separate sheet) Yes No

Section V: Human Health

- A. Is the receiving water designated as a Public Water Supply? Yes No
- B. Applicable criteria affected by variance: 1.5 ng/L Human Threshold Criterion
- C. Identify any expected impacts that the variance may have upon human health, and include any citations:
- The proposed variance will not adversely affect human health directly through the drinking water.
 - Wisconsin's fish consumption advisory program is designed to mitigate the effect of any ambient mercury concentration above the 1.5 ng/L water quality criterion for the protection of the fish-consuming human population by providing advice to the public to guide them on the amounts of fish that may be consumed safely.
 - Given the lack of wastewater treatment technologies capable of reducing mercury concentrations to achieve a 1.3 ng/L effluent limit, granting a variance in this situation is consistent with protecting the public health, safety and welfare because of the substantial public health and safety benefits of providing wastewater treatment, the continued commitment towards further mercury pollutant minimization, the Wisconsin fish advisory program, and the limited impact of the elevated effluent concentrations given the background mercury concentrations.
 - The statewide safe fish eating guidelines, which are based upon mercury as the primary contaminant, apply to fish taken from the Waupaca River and the downstream Wolf River – with the exception that a more restrictive fish consumption advisory for PCBs applies to carp and channel catfish (larger than 26") taken from the Wolf River between the Shawano Dam and Lake Winnebago.
- Citation: WDNR Fish Consumption Advisories: <http://dnr.wi.gov/topic/fishing/consumption/index.html>

Section VI: Aquatic Life and Environmental Impact

- A. Aquatic life use designation of receiving water: Fish and aquatic life (warm water sport fish community)
- B. Applicable criteria affected by variance: 1.3 ng/L Wildlife Criterion
- C. Identify any environmental impacts to aquatic life expected to occur with this variance, and include any citations:
- Not Likely to Adversely Affect
- Ambient mercury concentrations resulting from the variance will be substantially less than levels that result in direct toxicity to aquatic organisms. EPA's current chronic aquatic life criterion for mercury is 0.9081 µg/L, which is approximately three orders of magnitude greater than the wildlife criteria (0.0013 µg/L). Wisconsin's criteria are 0.44 µg/L and 0.83 µg/L for chronic and acute toxicity, respectively.
 - Hine's emerald dragonfly (*Somatochlora hineana*, endangered)
 - Higgins' Eye mussel (*Lampsilis higginsii*, endangered)
 - Winged Mapleleaf mussel (*Quadrula fragosa*, endangered)
 - Spectaclecase (*Cumberlandia monodonta*, candidate)
 - Sheepnose (*Plethobasus cyphus*, candidate)
 - Low trophic level prey where mercury in prey is unlikely to accumulate to toxic levels in the organism.
 - Piping plover (*Charadrius melodus*, endangered)
 - Eastern massasauga rattlesnake (*Sistrurus catenatus catenatus*, candidate)

May Affect, Not Likely to Adversely Affect

- Bald eagle (*Haliaeetus leucocephalus*, threatened)
Bald eagles consume fish and waterfowl from surface waters, which puts them at risk of exposure to toxic levels of mercury due to bioaccumulation of mercury in their prey organisms. However, despite the potential for exposure, ambient surface water data show that in recent decades, mercury levels have

not increased and bald eagle populations have continued to grow. This indicates that current ambient concentrations of mercury and mercury concentrations in prey organisms do not appear to be limiting recovery of bald eagle populations in Wisconsin. Although this variance will allow permitted dischargers additional time to identify and control sources of mercury in their discharges, the pollutant minimization component of the variances should result in a net reduction in the amount of mercury discharged to Wisconsin surface waters from permitted point sources, further reducing any risk to bald eagles. In addition, the pollutant minimization programs encourage other pollution prevention efforts, which has a beneficial indirect effect of reducing the use and production of products and processes that use or contribute mercury to the environment. These efforts will also benefit bald eagles.

D. List any Endangered or Threatened species known or likely to occur within the affected area, and include any citations:

County	Species	Status
Waupaca	Wood Turtle (<i>Glyptemys insculpta</i>)	Threatened
Waupaca	Blanding's Turtle (<i>Emydoidea blandingii</i>)	Threatened
Waupaca	Greater Redhorse (<i>Moxostoma valenciennesi</i>)	Threatened
Waupaca	Snuffbox Mussel (<i>Epioblasma triquetra</i>)	Endangered

Citation: U.S. Fish & Wildlife Service – Environmental Conservation Online System (<http://www.fws.gov/endangered/>) and National Heritage Index (<http://dnr.wi.gov/topic/nhi/>)

Section VII: Economic Impact and Feasibility

A. What modifications would be necessary to comply with the current limits? Include any citations.

Unknown but source reduction measures continue to be required via implementation of a pollutant minimization plan (PMP). The Department considers treating these large volumes to produce effluent with even lower concentrations to be technically and economically infeasible.

Citation: Assessing the Economic Impacts of the Proposed Ohio EPA Water Rules on the Ohio Economy, April 24, 1997, Ohio Environmental Protection Agency, Division of Surface Water and Foster Wheeler Environmental Corporation and DRI/McGraw-Hill in support of Amended and New Rules in OAC Chapters 3745-1, -2, and -33.

B. Identify any expected environmental impacts that would result from further treatment, and include any citations:

See above.

C. Is it technically and economically feasible for this permittee to modify the treatment process to reduce the level of the substance in the discharge? Yes No Unknown

(Provide the basis for this conclusion, including citations. If treatment is technically infeasible, provide an analysis of the factors that demonstrates technical infeasibility. If treatment is economically infeasible, provide an analysis of the economic cost to ratepayers that demonstrate economic infeasibility. Attach additional sheets if necessary.)

The Department considers treating these large volumes to produce effluent with even lower concentrations to be technically and economically infeasible.

Citation: Assessing the Economic Impacts of the Proposed Ohio EPA Water Rules on the Ohio Economy, April 24, 1997, Ohio Environmental Protection Agency, Division of Surface Water and Foster Wheeler Environmental Corporation and DRI/McGraw-Hill in support of Amended and New Rules in OAC Chapters 3745-1, -2, and -33.

D. If treatment is possible, is it possible to comply with the limits on the substance? Yes No Unknown

The Department considers treating these large volumes to produce effluent with even lower mercury concentrations to be technically and economically infeasible.

Citation: Assessing the Economic Impacts of the Proposed Ohio EPA Water Rules on the Ohio Economy, April 24, 1997, Ohio Environmental Protection Agency, Division of Surface Water and Foster Wheeler Environmental Corporation and DRI/McGraw-Hill in support of Amended and New Rules in OAC Chapters 3745-1, -2, and -33.

E. If yes, what prevents this from being done? Include any citations.

See above.

F. List any alternatives to current practices that have been considered, and why they have been rejected as a course of action, including any citations:

DNR did not determine options for meeting the limit. The Department considers treating these large volumes to produce effluent with even lower mercury concentrations to be technically and economically infeasible.

Citation: Assessing the Economic Impacts of the Proposed Ohio EPA Water Rules on the Ohio Economy, April 24, 1997, Ohio Environmental Protection Agency, Division of Surface Water and Foster Wheeler Environmental Corporation and DRI/McGraw-Hill in support of Amended and New Rules in OAC Chapters 3745-1, -2, and -33.

Section VIII: Compliance with Water Quality Standards

A. Describe all activities that have been, and are being, conducted to reduce the discharge of the substance into the receiving stream. This may include existing treatments and controls, consumer education, promising centralized or remote treatment technologies, planned research, etc. Include any citations.

The permittee has collaborated with the Waupaca County Solid Waste Department in the operation of a Household Hazardous Waste Disposal Facility. In April 2013 the City of Waupaca developed a Mercury Pollutant Minimization Program (PMP) Plan (attached). The permit will require the permittee to follow this PMP plan.

B. Describe all actions that the permit requires the permittee to complete during the variance period to ensure reasonable progress towards attainment of the water quality standard. Include any citations.

The permit requires the permittee to conduct source reduction efforts under its Mercury PMP and submit annual status reports on the progress of implementing the PMP. The permit also requires the permittee to require the installation of amalgam separators - and an on-going program to maintain those separators - in all dental facilities in its service area by June 30, 2018.

Section IX: Compliance with Previous Permit (Variance Reissuances Only)

A. Date of previous submittal: Not applicable **Date of EPA Approval:** _____

B. Previous Permit #: _____ **Previous WQSTS #:** _____ (EPA USE ONLY)

C. Effluent substance concentration: _____ **Variance Limit:** _____

D. Target Value(s): _____ **Achieved?** Yes No Partial

E. For renewals, list previous steps that were to be completed. Show whether these steps have been completed in compliance with the terms of the previous variance permit. Attach additional sheets if necessary.

Condition of Previous Variance	Compliance
	<input type="checkbox"/> Yes <input type="checkbox"/> No

object_id	sample_pt_short_desc	storet_parm_desc	sample_date	Outfall 001	parm_unit	Criterion
001	Effluent	Mercury, Total Recoverable	06/06/2006	1.4	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	09/08/2006	1.7	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	12/04/2006	1.4	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	02/14/2007	4.7	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	05/30/2007	2	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	08/07/2007	1	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	10/16/2007	0.94	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	01/23/2008	1.4	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	05/01/2008	1.3	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	07/29/2008	1.6	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	10/28/2008	1	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	02/09/2009	1.4	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	05/19/2009	1.8	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	07/28/2009	0.34	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	10/14/2009	0.96	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	01/13/2010	1.5	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	04/27/2010	3.4	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	07/21/2010	2.9	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	10/11/2010	1.3	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	01/18/2011	1.7	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	05/05/2011	2.9	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	07/19/2011	2.4	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	10/11/2011	1.1	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	01/10/2012	0.25	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	04/24/2012	1.7	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	07/10/2012	3.4	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	11/20/2012	2.8	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	02/05/2013	1.3	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	05/01/2013	2.2	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	07/09/2013	2.3	ng/L	1.3
001	Effluent	Mercury, Total Recoverable	10/01/2013	1.1	ng/L	1.3
111	Field Blank	Mercury, Total Recoverable	06/06/2006	0.36	ng/L	
111	Field Blank	Mercury, Total Recoverable	09/08/2006	0.13	ng/L	
111	Field Blank	Mercury, Total Recoverable	12/04/2006	0.13	ng/L	
111	Field Blank	Mercury, Total Recoverable	02/14/2007	0.23	ng/L	
111	Field Blank	Mercury, Total Recoverable	05/30/2007	0.13	ng/L	
111	Field Blank	Mercury, Total Recoverable	08/07/2007	0.13	ng/L	
111	Field Blank	Mercury, Total Recoverable	10/16/2007	0.13	ng/L	
111	Field Blank	Mercury, Total Recoverable	01/23/2008	0.13	ng/L	
111	Field Blank	Mercury, Total Recoverable	05/01/2008	0.13	ng/L	
111	Field Blank	Mercury, Total Recoverable	07/29/2008	0.13	ng/L	
111	Field Blank	Mercury, Total Recoverable	10/28/2008	0.13	ng/L	
111	Field Blank	Mercury, Total Recoverable	02/09/2009	0.13	ng/L	
111	Field Blank	Mercury, Total Recoverable	05/19/2009	0.13	ng/L	
111	Field Blank	Mercury, Total Recoverable	07/28/2009	0.13	ng/L	
111	Field Blank	Mercury, Total Recoverable	10/14/2009	0.13	ng/L	
111	Field Blank	Mercury, Total Recoverable	01/13/2010	0.13	ng/L	
111	Field Blank	Mercury, Total Recoverable	04/27/2010	0.21	ng/L	
111	Field Blank	Mercury, Total Recoverable	07/21/2010	0.21	ng/L	
111	Field Blank	Mercury, Total Recoverable	10/11/2010	0.21	ng/L	
111	Field Blank	Mercury, Total Recoverable	01/18/2011	0.21	ng/L	

111	Field Blank	Mercury, Total Recoverable	05/05/2011	0.25 ng/L
111	Field Blank	Mercury, Total Recoverable	07/19/2011	0.25 ng/L
111	Field Blank	Mercury, Total Recoverable	10/11/2011	0.25 ng/L
111	Field Blank	Mercury, Total Recoverable	01/10/2012	0.25 ng/L
111	Field Blank	Mercury, Total Recoverable	04/24/2012	0.25 ng/L
111	Field Blank	Mercury, Total Recoverable	07/10/2012	0.25 ng/L
111	Field Blank	Mercury, Total Recoverable	11/20/2012	0.25 ng/L
111	Field Blank	Mercury, Total Recoverable	02/05/2013	0.25 ng/L
111	Field Blank	Mercury, Total Recoverable	05/01/2013	0.25 ng/L
111	Field Blank	Mercury, Total Recoverable	07/09/2013	1.4 ng/L
111	Field Blank	Mercury, Total Recoverable	10/01/2013	0.25 ng/L
701	Influent	Mercury, Total Recoverable	06/06/2006	3.3 ng/L
701	Influent	Mercury, Total Recoverable	09/08/2006	240 ng/L
701	Influent	Mercury, Total Recoverable	12/04/2006	190 ng/L
701	Influent	Mercury, Total Recoverable	02/14/2007	130 ng/L
701	Influent	Mercury, Total Recoverable	05/30/2007	860 ng/L
701	Influent	Mercury, Total Recoverable	08/07/2007	89 ng/L
701	Influent	Mercury, Total Recoverable	10/16/2007	440 ng/L
701	Influent	Mercury, Total Recoverable	01/23/2008	47 ng/L
701	Influent	Mercury, Total Recoverable	05/01/2008	460 ng/L
701	Influent	Mercury, Total Recoverable	07/29/2008	370 ng/L
701	Influent	Mercury, Total Recoverable	10/28/2008	220 ng/L
701	Influent	Mercury, Total Recoverable	02/09/2009	33 ng/L
701	Influent	Mercury, Total Recoverable	05/19/2009	850 ng/L
701	Influent	Mercury, Total Recoverable	07/28/2009	180 ng/L
701	Influent	Mercury, Total Recoverable	10/14/2009	290 ng/L
701	Influent	Mercury, Total Recoverable	01/13/2010	83 ng/L
701	Influent	Mercury, Total Recoverable	04/27/2010	630 ng/L
701	Influent	Mercury, Total Recoverable	07/21/2010	110 ng/L
701	Influent	Mercury, Total Recoverable	10/11/2010	48 ng/L
701	Influent	Mercury, Total Recoverable	01/18/2011	100 ng/L
701	Influent	Mercury, Total Recoverable	05/05/2011	110 ng/L
701	Influent	Mercury, Total Recoverable	07/19/2011	35 ng/L
701	Influent	Mercury, Total Recoverable	10/11/2011	130 ng/L
701	Influent	Mercury, Total Recoverable	01/10/2012	90 ng/L
701	Influent	Mercury, Total Recoverable	04/24/2012	140 ng/L
701	Influent	Mercury, Total Recoverable	07/10/2012	150 ng/L
701	Influent	Mercury, Total Recoverable	11/20/2012	120 ng/L
701	Influent	Mercury, Total Recoverable	02/05/2013	85 ng/L
701	Influent	Mercury, Total Recoverable	05/01/2013	39 ng/L
701	Influent	Mercury, Total Recoverable	07/09/2013	59 ng/L
701	Influent	Mercury, Total Recoverable	10/01/2013	49 ng/L

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