

Mercury Pollutant Minimization Program Plan
Streamlined Mercury Variance Application
City of Elkhart, Indiana

The City of Elkhart Public Works and Utilities (Utility) owns and operates a wastewater treatment plant (WWTP) located at 1201 S. Nappanee St., Elkhart, IN 46516. This facility discharges effluent to the St. Joseph River under the authority of the Indiana Department of Environmental Management (IDEM) through the National Pollutant Discharge Elimination System (NPDES) with permit #IN0025674. The facility utilizes the conventional activated sludge process and is designed to treat an average daily flow of 20 million gallons per day. Sampling data indicates that the concentration of mercury in the WWTP's final effluent frequently exceeds the mercury water quality criterion for Great Lakes dischargers, and a renewal of the Utility's SMV is necessary. The Utility is proposing to maintain the current interim discharge limit.

As required under 327 IAC 5-3.5-9, the Utility has prepared this Pollutant Minimization Plan for mercury. The Pollutant Minimization Program Plan (PMPP) is submitted as part of the SMV application to IDEM. The goal of the PMPP is to reduce the amount of mercury-containing materials at the WWTP and the amount of mercury entering the collection system. This will be accomplished by updating inventories of potential mercury sources and implementing the planned activities outlined in the PMPP. In addition, the Utility will continue previous efforts to reduce mercury in the WWTP effluent. The Utility has complied with previous PMPPs and is committed to fulfilling this PMPP.

Part Two - Pollutant Minimization Program Plan (PMPP) Inventory/Identification

Part Two A - Preliminary Inventory of Potential Mercury Sources at the Wastewater Treatment Plant

The Utility has completed a preliminary inventory of potential uses and sources of mercury at the WWTP, as well as a preliminary identification of mercury-bearing equipment and mercury storage sites. See Pages 2 and 3 of the application for the complete list. All items from the preliminary inventory were reviewed and are included in Part Two B as a complete inventory.

Part Two B - Plan and Schedule for a Complete Inventory of Potential Mercury Sources at the Wastewater Treatment Plant

A complete detailed inventory is included here.

Laboratory Equipment

Product	Quantity	Evaluation of Alternative
Thermometers	Confirmed that none contain mercury	N/A

Laboratory Chemicals

Product	Quantity	Evaluation of Alternative
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COD analysis reagent	up to 750 vials with 3.3 mL of reagent containing <1% mercury.	As long as we continue to have interference from chlorides in the samples a mercury free reagent is not an option
Sodium hypochlorite	Only Clorox brand is used. Clorox does not purchase sodium hydroxide or chlorine that is manufactured with the mercury cell process.	N/A

Bulk Chemicals

Product	Quantity	Evaluation of Alternative
Phosphorus removal chemicals/ Pickling liquors / Ferric chloride	Contacted supplier and they were not aware of any mercury potential in their product. Also consulted the SDS. PWU willing to conduct additional testing if requested by IDEM.	N/A
Sludge thickening polymers	Contacted supplier and they were not aware of any mercury potential in their product. Also consulted the SDS. PWU willing to conduct additional testing if requested by IDEM.	N/A

Process Control and Measuring Equipment

Product	Quantity	Evaluation of Alternative
Flow meters	Visual inspection indicated that none contained mercury	N/A
Gas regulators and meters	Visual inspection indicated that none contained mercury	N/A
Level and rotation sensors	Visual inspection indicated that none contained mercury	N/A
Mercoid control switches	Approximately 20 switches have been located at this time (approximately 30 grams each)	Have not found an adequately reliable solution for some critical systems. Will replace non-critical at end of life.
Thermometers	Visual inspection indicated that none contained mercury.	N/A
Sump pump, bilge pump and other float controls	Approximately 180 in use throughout plant and lift stations (between 1 and 200 grams each)	Previous attempts to move to mercury free alternatives resulted in unacceptable service interruptions due to reliability issues. PWU will

		continue to evaluate alternatives.
Thermostats and thermoregulators	Approximately 10 exist on older pieces of equipment (approximately 4 grams each)	Will replace at end of equipment lifespan.
Transmitters	Visual inspection indicated that none contained mercury	

Buildings

Product	Quantity	Evaluation of Alternative
Flame sensors	Visual inspection indicated that none contained mercury	N/A
Pressure/ flow controls on air handling units	Visual inspection indicated that none contained mercury	N/A
Fire and Alarm Box Switches	Visual inspection indicated that none contained mercury	N/A
Relay switches	See Mercoid control switches in Process Control and Measuring Equipment	N/A
Phosphorus removal chemicals/ Pickling liquors / Ferrous chloride	Contacted supplier and they were not aware of any mercury potential in their product. Also consulted the SDS. PWU willing to conduct additional testing if requested by IDEM.	N/A
Sump pump, bilge pump and other float controls	See Sump pump, bilge pump and other float controls in Process Control and Measuring Equipment	N/A
Thermostats	Visual inspection indicated that none contained mercury	N/A

Lamps

Product	Quantity	Evaluation of Alternative
Fluorescent	Approximately 400 bulbs remaining (5-10mg each)	Being replaced with LED over time
High-pressure sodium	Approximately 30 bulbs remaining (10-50 mg each)	Being replaced with LED over time
Metal halide	Approximately 30 bulbs remaining (50-100 mg each)	Being replaced with LED over time
Ultraviolet disinfection	144 (42 mg each)	Required for wastewater disinfection and no substitute currently offered

Batteries

Product	Quantity	Evaluation of Alternative
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Mercury-zinc (button) batteries	20 identified, but regularly changed and some may have failed to be identified (5mg each)	Required type by the manufacturer of the equipment. No practical alternative to the equipment has been identified.
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Paint

Product	Quantity	Evaluation of Alternative
Marine Paint	A review of available product information did not indicate that the paint contained mercury	N/A

Other

Product	Quantity	Evaluation of Alternative
Computer monitors	Approximately 20 monitors (0.12-5mg each) are not mercury free	Replace with LED over time. Our IT Department handles monitor purchasing and disposal and all current monitors being purchased are mercury free.
Fleet vehicles	Oldest vehicle is 2007, should not have any switches in vehicles that are mercury, No vehicles with HID lamps were known to central garage	N/A

Collection System

Product	Quantity	Evaluation of Alternative
Lift station equipment	See Sump pump, bilge pump and other float controls in Process Control and Measuring Equipment	N/A
Sumps with accumulated mercury	Confirmed none recently seen and notified relevant personnel of actions to take if it is seen	N/A
Sewer lines with accumulated mercury	Confirmed none recently seen and notified relevant personnel of actions to take if it is seen	N/A

Mercury Storage Sites

Product	Quantity	Evaluation of Alternative
Lab waste mercury disposal area	1 55 gallon drum for waste COD reagent and vials	N/A

Maintenance fluorescent tube disposal storage area	Bulbs are regularly added and removed.	N/A
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Part Two C - Preliminary Evaluation of Potential Sources of Mercury in the WWTP Influent

Name	Address
Clinics and Hospitals	
Beacon Medical Group	500 Arcade Ave
Beacon Medical Group	1753 Fulton St
Beacon Medical Group	3301 County Road 6
Beacon Medical Group	1627 E Bristol St
Beacon Medical Group	525 W Bristol St
Beacon Medical Group	2405 W Lexington Ave
Beacon Occupational Health	22818 Old US 20
Bristol Street Family Practice	609 W Bristol St
Corporate Care Occupational Health	3100 Windsor Ct
Elkhart Clinic	303 S Nappanee St
Elkhart County STD Clinic	608 Oakland Ave
Elkhart Family Physicians	2115 W Lexington Ave
Elkhart Hematology & Oncology	2117 W Lexington Ave
Elkhart General Hospital	600 East Blvd
Goshen Physicians	3421 S Main St
Heart City Health	1545 Cassopolis St
Heart City Health	148 W Hively Ave, STE 1
Heart City Health	236 Simpson Ave
Michiana Internal Medicine PC	525 State Route 19
Minority Health Coalition- Elkhart County	312 Wagner St #A
Oaklawn	2600 Oakland Ave
Physicians Urgent Care	900 Johnson St
Quintess Primary Care LLC	818 E Bristol St
Women's Care Center	229 W Marion St
Nursing Homes	
Brentwood at Elkhart	3600 E Bristol St
Eastlake Nursing & Rehab. Center	1900 Jeanwood Dr
Eastlake Terrace Assisted Living	3109 E Bristol St
Elkhart Meadows	2600 Morehouse Ave
Elkhart Place	2024 County Road 24
Golden Living Center	1001 W Hively Ave
Greenleaf Living Center	1201 E Beardsley Ave
Harmony at Elkhart	1129 Parkway Ave
Hellenic Senior Living of Elkhart	2528 Bypass Rd
Hubbard Hill	28070 County Road 24
Riverside Village	1400 W Franklin St

Name	Address
Valley View Healthcare Center	333 W Mishawaka Rd
Woodland Manor	343 S Nappanee St
Veterinary Clinics	
Animal Aid Clinic North	516 County Road 6 E
Animal Aid Clinic South	3718 Mishawaka Rd
Garrett Veterinary	2122 W Franklin St
Noah's Landing Pet Care Clinic	3929 E Jackson Blvd
Dental Offices	
ABG Dental	2549 Prairie St
Bittersweet Road Family Dentists	51410 Bittersweet Rd
Christiana Creek Dental Care	301 W Bristol St
Complete Family Dentistry	415 Waterfall Dr
Comprehensive Dental Care	3820 E Bristol St
Elkhart Dental & Implant Center	125 S Nappanee St
Elkhart Pediatric Dentistry	4420 E Bristol St
Emily Stout DDS	805 Waterbury Park Dr
Granger Family Dentistry	12545 State Rd 23
Greenleaf Family Dentistry	1520 Osolo Rd
Healthy Beginnings Dental Clinic	1400 Hudson St
Heart City Health Dental	2100 Superior St
King Dental Group North	902 County Road 6
King Dental Group South	25947 County Road 20
North Point Pediatric Dentistry	810 Waterbury Park Dr
Northside Family Dentistry	2851 E Bristol St
Oral Surgery Michiana	117 N Nappanee St
Orange Door Dental Group	110 N Nappanee St
Pippin Dental	3701 S Main St Suite A150
Prairie Street Family Dentistry	2735 Prairie St
Randy Stauffer DDS	920 E Mishawaka Rd
Reider Family Dentistry	423 Waterfall Dr
Snyder Douglas DDS	427 Waterfall Dr
Springer Dental Care	3702 E Mishawaka Rd
Turnock Jack A DDS	330 W Lexington Ave Suite 201
Watkins Family Dentistry	205 E Jackson Blvd
Significant Industrial Users	
Anderson Silver Plating	541 Industrial Pkwy
B-D Industries	1715 Fieldhouse Ave
Bimbo Bakeries	53075 Frederic Dr
Bonnell Aluminum (Elkhart), Inc.	2551 County Road 10 W
Conn Selmer North – (Vincent Bach)	500 Industrial Pkwy
Continental Industries	100 W Windsor Ave
Continental Mirrored Graphics	1838 Middlebury St
D & W Incorporated	941 Oak St

Name	Address
Dexstar Wheel Company	400 Collins Rd
Earthmover's Landfill, LLC	26488 County Road 26
Elkhart Brass	1302 W Beardsley Ave
Elkhart Co. Landfill	59530 County Road 7 S
Elkhart Environmental Processing	1143 Oak St
Elkhart General Hospital	600 East Blvd
Elkhart Plating Co.	1913 14th St
Chemstation	425 Pine Creek Ct
Huntington Alloys/ Special Metals	2900 Higgins Blvd
Hydro Extrusion USA, LLC	3406 Reedy Dr
JBS Prepared Foods	24402 County Road 45
Lake Copper Conductors	4906 Hoffman St
Lippert Components, Plant #58	1722 Mishawaka Rd
Lippert Components, Plant #72	2501 Jeanwood Dr
Maverick Packaging	3505 Reedy Dr
McDowell Enterprises	2010 Superior St
MOR/ryde International – (stainless Dr)	309 Stainless Dr
Norco Industries, Inc.	2800 Northland Dr
Norfolk Southern Railway Co.	State Road 19 @ Lusher
RC Industries	1555 County Road 15
Temple Products – (Tuscany Dr)	3133 Tuscany Dr
Temple Products – (Wyland Dr)	4421 Wyland Dr
Valmont Industries	58027 Charlotte Ave
Voyant Beauty Main/North	2730 Middlebury St
Voyant Beauty West	1919 Superior St
Welch Packaging – (Corrugator)	1130 Herman St
Welch Packaging – (Ink)	1020 Herman St
Winona Powder	800 Summa Dr
Yellow Dog	2730 Almac Ct
General Industry Not Listed Elsewhere*	
Crosbie Foundry Co. Inc.	1600 Mishawaka St
Dometic	5155 Verdant St
East to West RV	3000 County Road 6 W
Forest River, Inc.	900 County Road 1
Godfrey Marine	4500 Middlebury St
Gulf Stream Coach	503 S Oakland Ave
Heartland Recreational Vehicles	2831 Dexter Dr
Jessen Manufacturing Co. Inc.	1409 W Beardsley Ave
Kobelco Compressors	3000 Hammond Ave
L E Johnson Products Inc.	2100 Sterling Ave
Masterbrand Cabinets	1203 Kent St
Novae Corp	4607 Wyland Dr
Patrick Industries	107 W Franklin St

Name	Address
Poly Electronics	4400 Wyland Dr
Tenneco Automotive Operating Co. Inc.	4825 Hoffman St
Thor Industries, Inc.	701 Country Road 15
Utilimaster	603 Earthway Blvd
Vixen Composites LLC	2965 Lavanture Pl
Winnebago Industries	1040 Commerce Dr
Additional Communities Served	
Elkhart County Regional Sewer District	Heaton Lake
Ontwa Township Sewer District	Ontwa Township, MI
Simonton Lake Conservancy District	Simonton Lake
Heating, Ventilation, and Air Conditioning	
Chupp Plumbing & Heating Inc.	23409 US Highway 33
Advanced Heating Inc	57986 County Road 9
Barden Heating & Cooling	59135 County Road 11
BW Cook Service Experts	1835 Leer Dr
Church Plumbing & Heating Inc.	2924 Oakland Ave
Crystal Valley Comfort	541 Roske Dr, STE C
Dunkin's Heating and Cooling	1327 Rice St
Griffen Plumbing & Heating, Inc.	2310 Toledo Rd
Henry Smith Plumbing & Heating, Inc.	28586 County Road 20
Lefever Plumbing & Heating, Inc.	510 S 2nd St
Legacy Heating and Air, Inc.	4902 Elkhart East Blvd
MHAA Inc.	54633 County Road 1
Michiana Indoor Comfort System	2336 Primrose Ave, STE C
Summers Plumbing, Heating, and Cooling	1846 Cassopolis St
Appliance Repair	
Ed's Appliance Store, Inc.	2017 Shaffer Ave
Jays Appliance Repairs L.L.C.	520 Naomi St
Marty's Appliance Repair	2632 Pleasant Plain Ave
Mr. Appliance of North Central Indiana	54628 County Road 17
Automotive Repair	
Accelerators Inc.	406 Roske Dr
AJ Service	947 Goshen Ave
Amaya' Auto & Repair Service	2610 S Main St
Angel Automotive, Inc.	3602 Charlotte Ave
Applewhite Automotive	1057 Johnson St
Average Joe's Auto Maintenance	1000 Cassopolis St
Azteca Auto Sales	2059 S Main St
Beardsley Auto Repair	1100 E Beardsley Ave
Caliber Collision	2200 Bypass Rd
Car Tech	1515 W Beardsley Ave
Chaparras Auto Repair	1822 Markle Ave
DMR the Ultimate Body Shop	726 S Main St

Name	Address
Dondi's Auto Repair	1939 Fieldhouse Ave
Elkhart Auto Center	2501 W Lexington Ave
Elmer's Body Shop	320 E Lexington Ave
Etling Automotive	2011 Cassopolis St
Exit 92 RV & Auto Repair Inc	524 Oakland Ave
Experts Auto Service	800 Goshen Ave
FMK Automotive	2117 14 th St
Gomez Auto Repair	1117 W Lusher Ave
Goyo's Auto Repair	2737 Hammond Ave
Heart City Toyota	711 N Nappanee St
Heartland Automotive	415 N Main St
Jim Stone's Service, Inc.	225 W Lexington Ave
Le Roy's Auto Service & Body Shop	1918 Markle Ave
Lochmandy Collision Center	1226 W Bristol St
Lochmandy Motors	920 N Nappanee St
Master Automotive	215 N Main St
Midas	2692 S Main St
Miracle Motor Werks	312 N Nappanee St
Monteith's Best-One Tire & Service of Elkhart	1642 W Beardsley Ave
Monteith's Best-One Tire & Service of Elkhart	2503 Cassopolis St
Morris Auto Services	134 S Elkhart Ave
North Side Service Center	140 County Road 6 W
Oakland Auto Tec	1819 W Lusher Ave
Oakland Service	1207 Lusher Ave
Qualified Auto Service	1800 Mishawaka St
Quality Import Service	2504 Johnson St
SAS Tire and Auto	850 W Bristol St
Service Center at Gurley Leep Honda	2345 Cassopolis St #2
Star Auto Refinishing	1613 Cassopolis St
Tom Naquin Chevrolet-Nissan	2500 W Lexington Ave
True Shade	500 Dr Martin Luther King Dr
Walmart Auto Care Centers	175 County Road 6
Walmart Auto Care Centers	30830 Old US 20
Zeigler Lincoln of Elkhart Service	2525 Bypass Rd
Educational Institutions	
Concord High School	59117 Minuteman Way
Elkhart Area Career Center	2424 California Rd
Elkhart Christian Academy	25943 County Road 22
Elkhart High School East	1 Blazer Blvd
Elkhart High School West	2608 California Rd
Indiana University South Bend – Elkhart	125 E Franklin St
Ivy Tech	22531 County Road 18
Jimtown High School	59021 County Road 3

* In some cases the headquarters is listed and will be contacted regarding their multiple facilities under a number of brands in our service area.

The Utility attests to the fact that an identification of the responsibilities of significant industrial users among such possible sources of mercury under P.L. 225-2001 has been undertaken.

Part Two D - Plan and Schedule for Completion of the Evaluation of Possible Sources of Mercury in the WWTP Influent

The Utility has completed a preliminary evaluation of sources of mercury in the WWTP's influent. Potential sources identified in the preliminary evaluation will be further investigated to determine if they are a source of mercury. All confirmed sources of mercury in the influent will be identified by name and address.

The complete evaluation will be submitted within 9 months of the SMV approval.

Part Three - Pollutant Minimization Program Plan Planned Activities

Part Three A and B- Planned Activities to Eliminate or Minimize the Release of Mercury to Waters of the State Measures and Schedule for Planned Activities

The following activities will be undertaken to eliminate or minimize the release of mercury to the St. Joseph River at outfall 035.

Planned Activity	Goal	Measure of Performance	Schedule of Action
A review of purchasing policies and procedures	• Review purchasing policies as appropriate to reduce or eliminate mercury-containing products • Train and inform city administration and purchasing agent	• Implementation of any new policies and completion of training of city administration	• Complete within 9 months of approval of SMV
Necessary training and awareness for facility staff including an education program	• Review and update program to educate staff on mercury-related purchasing policies, proper handling and disposal, and spill containment procedures • Provide refresher training to all Utility staff	• Number of staff trained and inclusion of mercury information in new employee packet	• Review of education program within 9 months of approval of SMV • Complete within 12 months of approval of SMV
An education program for the public within the service area of the facility	• Review and update program to educate the public about the use of mercury containing products and proper disposal practices. Attend local annual environmental festival to provide educational materials.	• Documentation of attendance at event along with amount of outreach material shared with the public	• Review of education program within 9 months of approval of SMV • Complete within 18 months of approval of SMV • Education will be ongoing
Evaluation of alternatives to the use of mercury-containing equipment or materials	• Review items previously identified to contain mercury and reevaluate potential alternatives that contain less or no mercury. Items will be prioritized based on the amount of mercury contained in the item, potential for release, and cost of replacement. • Complete evaluation of alternatives	• Review of the plan to reduce the amount of materials and equipment that contain mercury • Completion of evaluations of alternatives that contain less or no mercury	• Review of plan to review items that contain mercury within 9 months of approval of SMV • Complete within 18 months of approval of SMV
Sampling in the sewer system at designated lift stations.	• Identify potential sources of mercury	• Completion of sampling	• Develop sampling plan within 9 months • Complete sampling within 18 months

The City attests to the fact that an identification of the City's responsibilities under P.L. 225-2001 has been undertaken.

Part Three C - Planned Activities to Reduce or Eliminate Mercury Loadings in WWTP Influent

Sector	Planned Activity	Goal	Measure of Performance	Schedule of Action
Medical Facilities - Hospitals - Clinics - Nursing homes - Veterinary facilities	- Mail AHA BMP literature to facilities - Mail mercury information to new facilities	- Be mercury-free where practical - Education and awareness	- Participation - Date mailed and content	Complete mailing of literature and mercury information within 9 months of SMV approval
Dental Clinics	Mail ADA BMP literature to facilities	- Minimize mercury discharges - Education and awareness	Date mailed and content	- Complete mailing of BMP literature within 9 months of SMV approval - Inspection of amalgam separators within 12 months of SMV approval
Public and Private Educational Laboratories	Mail mercury information	Education and awareness	- Participation - Date mailed and content	Mail out mercury information within 9 months of SMV approval
General Industry and all SIUs including - HVAC - Appliance Repair - Auto Repair	- SIU on-site visits - Mail mercury literature - Identify additional potential mercury contributors - Continue conducting mercury analysis of all permitted industries - Continue to incorporate mercury limit in permits	- Ensure permit compliance - Education and awareness - Mercury reduction	- Compliance evaluation - Participation	- Complete site visits within 12 months of SMV approval. - Complete mailing of literature within 9 months of SMV approval - Complete all other activities within 24 months of SMV approval
Retail and Residential Sources	- Include mercury information in a Utility bill - Review information about mercury on the City website	Education and awareness	Date mailed and content	- Post information on city website within 9 months of SMV approval - Information in bill within 18 months of SMV approval
Additional Communities Served	Discuss with representatives how we can work together to decrease mercury	Education, awareness, and source identification	Date of discussion held with each entity	Complete within 9 months of SMV approval

Part Three D - Identification of Resources and Staff Necessary to Implement the PMPP

Personnel Resources:

Assistant Director – Utilities
Assistant Director – Regulatory
Pretreatment Staff
Maintenance Supervisor
Operations Supervisor
Chief Chemist

Funding: Wastewater funds will be used to implement the PMPP. The Utility will actively seek alternative funding opportunities. The planned activities in the PMPP have been developed with the Utility's financial limitations in mind.

Part Four - Mercury Monitoring Data

The following is the mercury data for the WWTP influent, effluent and biosolids for the previous two years. The most recent data as of August, 2026, is provided in the application. More recent data may be available upon request.

Influent				
<i>Date (month, day, year)</i>	<i>Result</i>	<i>ng/l</i>	<i>U.S. EPA Method</i>	<i>Analytical Laboratory</i>
9/3/24	19.7	ng/L	EPA 1631 E	Pace Analytical
11/4/24	32.6	ng/L	EPA 1631 E	Pace Analytical
1/15/25	7.52	ng/L	EPA 1631 E	Pace Analytical
3/3/25	160	ng/L	EPA 1631 E	Pace Analytical
5/21/25	8.28	ng/L	EPA 1631 E	Pace Analytical
7/2/25	12.9	ng/L	EPA 1631 E	Pace Analytical
9/9/25	11.1	ng/L	EPA 1631 E	Pace Analytical
11/5/25	11.9	ng/L	EPA 1631 E	Pace Analytical
1/7/26	14	ng/L	EPA 1631 E	Pace Analytical
3/3/26	155	ng/L	EPA 1631 E	Pace Analytical
5/1/26	13.4	ng/L	EPA 1631 E	Pace Analytical
7/1/26	15.3	ng/L	EPA 1631 E	Pace Analytical

Effluent				
Date (month, day, year)	Result	ng/l	U.S. EPA Method	Analytical Laboratory
9/3/24	0.81	ng/L	EPA 1631 E	Pace Analytical
11/4/24	1.07	ng/L	EPA 1631 E	Pace Analytical
1/15/25	0.931	ng/L	EPA 1631 E	Pace Analytical
3/3/25	0.55	ng/L	EPA 1631 E	Pace Analytical
5/21/25	0.602	ng/L	EPA 1631 E	Pace Analytical
7/2/25	0.738	ng/L	EPA 1631 E	Pace Analytical
9/9/25	0.85	ng/L	EPA 1631 E	Pace Analytical
11/5/25	0.98	ng/L	EPA 1631 E	Pace Analytical
1/7/26	1.65	ng/L	EPA 1631 E	Pace Analytical
3/3/26	1.72	ng/L	EPA 1631 E	Pace Analytical
5/1/26	2.3	ng/L	EPA 1631 E	Pace Analytical
7/1/26	0.532	ng/L	EPA 1631 E	Pace Analytical

Biosolids				
Date (month, day, year)	Result	Unit	U.S. EPA Method	Analytical Laboratory
7/1/25 to 7/31/25 Composite	<1.2	mg/kg	EPA 7471 A	Pace Analytical
8/1/25 to 8/31/25 Composite	<1.2	mg/kg	EPA 7471 A	Pace Analytical
9/1/25 to 9/30/25 Composite	<1.2	mg/kg	EPA 7471 A	Pace Analytical
10/1/25 to 10/31/25 Composite	<1.2	mg/kg	EPA 7471 A	Pace Analytical
11/1/25 to 11/30/25 Composite	<1.3	mg/kg	EPA 7471 A	Pace Analytical
12/1/25 to 12/31/25 Composite	<1.3	mg/kg	EPA 7471 A	Pace Analytical
1/1/26 to 1/31/26 Composite	<1.2	mg/kg	EPA 7471 A	Pace Analytical
2/1/26 to 2/30/26 Composite	<1.4	mg/kg	EPA 7471 A	Pace Analytical
3/1/26 to 3/31/26 Composite	<1.2	mg/kg	EPA 7471 A	Pace Analytical
4/1/26 to 4/28/26 Composite	<1.1	mg/kg	EPA 7471 A	Pace Analytical
5/1/26 to 5/31/26 Composite	<1.3	mg/kg	EPA 7471 A	Pace Analytical
6/1/26 to 6/30/26 Composite	<1.2	mg/kg	EPA 7471 A	Pace Analytical

Part Five - PMPP Additional Requirements

Part Five A - Proof of Public Notice

The City published notice of availability of the draft PMPP in the *Elkhart Truth* on October 13, 2026. The City attests that the draft PMPP was available at:

- 1) the City of Elkhart Municipal Building (229 S. 2nd St.)
- 2) the Elkhart Public Library (300 S. 2nd St.)
- 3) the United States post office (601 S. Main St.)

Copies were also available by contacting Bryan Cress at Elkhart Public Works and Utilities, 1201 South Nappanee St., Elkhart, IN, 46516, or by phone at (574) 293-2572. Additionally, a copy was posted at www.cityofelkhartin.gov/sewer.

We are currently awaiting comments. Comments are due by November 16, 2026. All comments and responses will be submitted.

Part Five B - Annual Reports

Annual reports will be submitted to IDEM as required under 327 IAC 5-3.5-9(a)(8). The reports will include a description of the City's progress toward fulfilling each PMPP requirement, mercury monitoring results, and steps taken to implement each planned activity developed under the PMPP. All reports will be submitted on the anniversary of the effective date of the NPDES permit.

Post October 14, 2026 to November 16, 2026

**NOTICE OF AVAILABILITY
City of Elkhart Wastewater Treatment Plant
Elkhart, IN
NPDES Permit No. IN00025674**

Public Notification of Draft Pollutant Minimization Program Plan (PMPP)

The City of Elkhart, Indiana owns and operates a wastewater treatment plant (WWTP) located at 1201 S Nappanee St, Elkhart, IN 46516. This facility discharges effluent to the St. Joseph River under the authority of the Indiana Department of Environmental Management (IDEM) through the National Pollutant Discharge Elimination System (NPDES) with permit #IN0025674. The facility utilizes the conventional activated sludge process and is designed to treat an average daily flow of 20 million gallons per day. As required under 327 IAC 5-3.5-9, Elkhart has prepared a draft Pollutant Minimization Program Plan (PMPP) for mercury. The PMPP is required to be submitted as part of the Streamlined Mercury Variance (SMV) application to IDEM. The SMV is available to any facility with an effective NPDES permit that contains a water quality based effluent limit (WQBEL) for mercury that cannot be consistently achieved. The PMPP within the SMV provides the foundation for the development and implementation of a Pollutant Minimization Program (PMP), which includes: 1) identifying known mercury containing process chemicals and equipment and 2) identifying potential sources of mercury loadings in the WWTP influent. The PMPP contains planned activities to eliminate or minimize the potential release of mercury to waters of the state and to eliminate or reduce mercury loadings in the WWTP influent. For each planned activity there is a goal, a way to measure attainment of the goal, and a schedule to implement the goal. The purpose of this notice is to provide the general public the opportunity to review and comment on the draft PMPP before it is finalized and submitted to IDEM. The draft PMPP is available for review at the City of Elkhart Municipal Building (229 S 2nd St), the Elkhart Public Library (300 S 2nd St), and the United States post office (601 S Main St). Interested persons may also obtain a copy of the draft PMPP and additional information by contacting Bryan Cress at Elkhart Public Works and Utilities, 1201 S Nappanee St, Elkhart, IN, 46516, or by phone at (574) 293-2572. The draft PMPP can be accessed online at www.cityofelkhartin.gov/sewer. Comments must be mailed to Bryan Cress at the address above and postmarked by November 16, 2026.