

Mercury Pollutant Minimization Plan Report Cover Sheet

NPDES Permit Holder: Bad River Band of Lake Superior Chippewa Indians

Initial Plan: X Annual Report: and Date Initial Plan Submitted:

Report Date: Period Covered by This Report:

Name of Treatment Plant NPDES Permit Number Mercury Effluent Limit (ng/L)

Birch Hill Lagoon System

WI-0036579

Report Only (current)

Person to contact concerning information contained in this report:

Name: Philip Livingston

Title: Water & Wastewater Manager

Mailing Address: PO Box 39

City, State, Zip Code: New Odanah, WI 54861

Telephone No. 715-685-7878

E-mail: WaterSewerSupvr@badriver-nsn.gov

I have personally examined and am familiar with the information submitted in this document and attachments. Based upon my inquiry of the individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate and complete.

Date

Title of Official

Name of Official

Signature of Official

Mercury Pollutant Minimization Plan – Birch Hill (NPDES WI-0036579)

Implementation

The Bad River Water and Sewer Utility has reviewed the connections to the Birch Hill Community Sewer System and identified the most likely contributors to mercury in the influent wastewater stream to the Facultative Lagoon System Wastewater Treatment Facility (WWTF). These facilities are as follows:

- Birch Hill Community House – 77948 Plantation Lane
- Birch Hill Warden Station – 48641 Birch Hill Road

The Utility will request a copy of Safety Data Sheets (SDS) for the compounds used in everyday operation and maintenance at the facility. The Utility will review this documentation to identify any significant contribution to wastewater mercury.

Utility staff will then distribute the Facility Mercury Checklist to the facility manager and request the completed form be returned to the Utility Office at:

Philip Livingston, Water and Wastewater Manager
PO Box 39
Odanah, WI 54861
WaterSewerSupvr@badriver-nsn.gov

Proposed delivery and response dates for the checklists are described in the table below.

Delivery and return of the checklists will be recorded on the applicable **Facility Compliance and Outreach Summary** for the facility. Based on the responses provided in the checklists, the Utility will rank the potential mercury contribution and work with the higher contributor facilities in reducing the contamination. However, there are only two non-residential, non-industrial community buildings on this WWTF (refer to details above).

The Bad River Water and Sewer Utility will continue to monitor mercury at this WWTF and has implemented measures to improve mercury sampling techniques. Mercury sampling will be conducted in accordance with the Standard Operating Procedure (SOP) for Total Mercury Sampling – Wastewater Treatment Facilities. The SOP describes the Quality Assurance (QA) / Quality Control (QC) requirements, which will be followed and includes field duplicates and blanks. The minimum training level for the staff who are involved in the sampling efforts (or samplers) are to complete a training of the sampling collection and handling methods as described in the SOP; the training will be implemented by the Water and Wastewater Manager or another qualified trainer.¹ Records will be maintained to document the level of training for all samplers.

Following is a summary of the proposed schedule of tasks identified above along with other tasks applicable to this WWTF:

TASK	PROPOSED COMPLETION DATE
Monitor for mercury in the influent and effluent of the WWTF following the SOP	Quarterly for influent and twice per year (during discharge) for effluent

¹ Water and Wastewater Manager and other staff received a refresher training from U.S Geological Survey on May 13, 2026.

Request Safety Data Sheets (SDS) for major compounds used for everyday operation and maintenance from the facility identified above. In subsequent years, ask for any changes in SDS and major compounds used.	2/13 of each year
Review the SDS documentation to identify significant contributors of mercury to the wastewater stream.	3/13 of each year
Distribute Mercury Checklists to identified facility listed above. In subsequent years, ask for any changes to prior year's checklist.	3/17 of each year
Mercury Checklists due to Utility (including noting changes from prior year's checklist)	3/31 of each year
Ranking of mercury contributors based on surveys	4/14 of each year
Outreach/education/enforcement for major contributors (as applicable). This will consist of a meeting, email, letter, and/or other communication with an entity as appropriate.	5/15 of each year
Outreach/education to the Reservation community on household products that contain mercury and the proper disposal of these products. This will consist of a flyer posted on tribal website or social media, an article in a tribal newsletter, and/or display at a community event.	8/31 of each year
Complete a dashboard survey of the service area to look for other potential sources of mercury to the WWTF. Complete follow up (outreach/education/enforcement/etc.) as appropriate if potential sources are identified; this will consist of a meeting, email, letter, and/or other communication with an entity as appropriate.	9/30 of each year for the survey and if any potential sources identified, follow up completed within 45 days
Submit Mercury PMP Status Report to EPA summarizing implementation actions and any changes in the PMP for the subsequent year.	1/31 of each year starting in 2027

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School and Educational Facility Inventory¹

Name	Address	City, State, Zip Code	Type of Facility	Contact	Phone

¹ List should include all middle schools, high schools, technical schools, colleges, and universities.

School Mercury Checklist

Best Management Practices for Mercury are taken from the WDNR's "Green and Healthy Schools" Criteria

Compliance with these BMPs may be considered as compliance with the local sewer use ordinance limit for mercury; wastewater sampling and analysis may also be waived by the municipality. It is the intention of the Mercury Pollutant Minimization Program to encourage implementation of mercury BMPs. Report date BMP implemented, or if not implemented, date anticipated.

	Yes	No	Date	Best Management Practice
Policy				1. Has your school completed a mercury products inventory for the entire school?
				2. Does your school have an action plan in place to eliminate mercury-containing items that were found as a result of the inventory?
Mercury Products				3. Has all elemental mercury been eliminated from classrooms at your school?
				4. Have all mercury compounds been eliminated from classrooms and storerooms?
				5. Have all mercury lab thermometers been eliminated from the classrooms?
				6. Have all mercury lab barometers been eliminated from the classrooms?
				7. Have all mercury fever thermometers been eliminated from the nurse's office?
				8. Have all mercury blood-pressure cuffs been eliminated from the nurse's office?
				9. Are all mercury-containing items being stored in airtight, unbreakable containers?
				10. Has the danger of a mercury spill been mitigated by having a mercury spill kit and trained staffed to use the kit?
Optional				11. If your school has completed any of these activities, check below: ____ Classroom presentations on mercury ____ Recycling of fluorescent bulbs ____ Phase-out of mercury thermostats ____ Recycling of mercury batteries

Wastewater Sampling and Analysis (Not required for facilities implementing or scheduled to implement all BMPs)

Sampling Location _____ Mercury Effluent Concentration _____ Date _____
 (Attach summary if multiple wastewater outfalls)

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 Name of Facility Address Size of Facility (# of students, employees, other)

 Printed Name of Official Signature Title Phone Date

School and Educational Facility Compliance and Outreach Summary General

Outreach to All School and Educational Facilities

Outreach Accomplished	Outreach Planned

Outreach may include newspaper articles or advertisements, mailings, workshops, speaking engagements, etc. Identify type and date.

Compliance and Specific Outreach for Individual School and Educational Facilities

Name of Facility	Implemented All BMPs	Schedule d All	Wastewater Analysis	Outreach Accomplished	Outreach Planned

Outreach may include a site visit, an inspection, sampling, etc. Identify type and date.

Notes:

Mercury Pollutant Minimization Plan Summary of Resources

1. <u>Person(s) implementing PMP</u>	<u>Title</u>
<u>Philip Livingston</u>	<u>Utility Manager</u>
<u>Other Staff Names Redacted</u>	<u>Office Manager</u>
<u>Operator</u>	
<u>Operator</u>	

2. Total Person-Hours¹: _ Total Cost²: _

3. Are there any anticipated changes in treatment plant resources that would significantly change program hours or costs during the subsequent year, such as involving or hiring more personnel, purchasing equipment to implement the pollutant minimization program, or conducting compliance monitoring?

_____ Yes _____ No If yes, explain:

4. Collaboration on mercury reduction activities is encouraged. Did any other municipal departments, county agencies, non-profit organizations, or other municipalities help implement part of your mercury reduction program?

_____ Yes _____ No If yes, explain:

5. A program for collecting mercury from the permittee's sewer system users is required. List all available options for recycling mercury including household hazardous waste centers, clean sweep events, and collection events hosted by the POTW.

Recycling Option

Battery recycling boxes are available at a minimum of 1 location within tribal buildings on the Reservation, which allows community drop off (Natural Resources Department (NRD))

Frequency of Availability

Ongoing during business hours throughout the year

E-waste recycling is typically available to the tribal community throughout the Reservation as part of the Tribe's spring cleanup event (as funding allows). (Tribe's Recycling/Solid Waste Facility with support from NRD)

Annually (Spring)

E-waste recycling is available for a fee at the Tribe's Recycling/Solid Waste facility. This facility also collects and manages other waste for a fee.

Ongoing during business hours throughout the year

*Options also include opportunities off the Reservation, such as Clean Sweep events offered by counties for residents (annually) and waste management facilities (ongoing during business hours throughout the year with fees charged).

¹ Include time of all staff involved in administering and implementing the various program areas, e.g. Pretreatment Coordinator, Superintendent of POTW, Clerical Staff, Field Monitoring Personnel, Laboratory Personnel, and others.

² Include all administrative, monitoring, laboratory staff, and equipment costs including monitoring/analytical work done by an outside laboratory.