Metropolitan Wastewater Management Commission

partners in wastewater management

Mercury Minimization Plan

APPROVED

By DEQ on June 12, 2025

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1. Facility Information

			Date (mm/dd/yyyy):	10/11/2024	
Facility name:	Metropolitan Wastewater Management Commission		Permit No.:	102486	
Facility address:	410 River Ave				
City:	Eugene	State:	Oregon	ZIP code:	97404
Preparer name:	Contrail Smith		Preparer's telephone:	(541) 543-8026	
Preparer organization:	City of Eugene		Preparer's email:	Clsmith@eugene-or.gov	
Technical contact name:	Jon Wilson		Technical contact telephone:	(541) 682-8616	
			Technical contact email:	Jwilson@eugene-or.gov	
Legal contact name:	Tanya Haeri-McCarroll		Legal contact telephone:	(541) 682-8613	
			Legal Contact email:	Thaerimccarroll@eugene-or.gov	

2. Mercury Sources

Table 1. Source Summary

Source Categories	Mercury			Notes/Comments
	Current	Potential	N/A	
Industrial	☒	☐	☐	New and existing permitted dischargers are regularly monitored for mercury as part of Local Limits screening.
Dental	☐	☒	☐	The cities of Eugene and Springfield each have an active dental program in place to verify compliance with BMPs in conjunction with Oregon Dental Association who is the enforcement agency.
Commercial	☐	☒	☐	Commercial sectors with the potential to handle products containing mercury are regulated by other governmental programs that require proper disposal; therefore, these materials are unlikely to enter the sanitary sewer.
Residential	☐	☒	☐	While the presence of mercury in household products has been significantly reduced over the years, it has not been eliminated. Public messaging will be necessary to inform residents of proper handling of products known or assumed to contain mercury.
Landfill Leachate	☒	☐	☐	Lane County owns and operates the Short Mountain Landfill and discharges landfill leachate pursuant to an industrial pretreatment wastewater discharge permit that is managed by the City of Springfield. Improper

Source Categories	Mercury			Notes/Comments
	Current	Potential	N/A	
				residential, commercial, and industrial disposal of mercury containing materials have the potential to enter the POTW via this pathway.
Air Emissions and Deposition	☐	☐	☒	Air emissions and deposition is not a potential source of mercury as the service area has separate stormwater and sanitary sewer conveyance systems, so there is not a pathway for these sources of contaminants to enter the sanitary sewer. Additionally, there are also no municipal waste combustors or medical waste incinerators within the service area.
Schools (K-12)	☐	☐	☒	A concerted effort was conducted in 2002 – 2003 to remove mercury and products containing mercury from public schools within the service area, thus eliminating the potential for these materials from entering the sanitary sewer system. Additionally, local school districts have mercury-free building standards for new and replacement building construction.
Medical Facilities	☐	☒	☐	Medical facilities have their own drug disposal procedures, which reduce the potential for medication containing mercury to be improperly disposed in the sanitary sewer, though there is the potential for mismanagement.
Commercial Laboratories	☐	☒	☐	This sector has the potential to discharge minimal quantities of mercury if proper waste management practices are not followed. Best management practices and other outreach materials are in the process of being developed.
Higher Level Educational Facilities	☒	☐	☐	The University of Oregon discharges pursuant to an industrial pretreatment wastewater discharge permit that is managed by the City of Eugene. Routine monitoring for mercury is conducted. While this monitoring has yielded detectable concentrations, the concentrations are below the values established by the Local Limits. Other higher level educational facilities have been determined not to have the potential to discharge identifiable quantities of mercury at this time.
HVAC	☐	☐	☒	This sector is regulated by other programs and there is not a potential for mercury containing equipment to be disposed in the sanitary sewer.
International Paper Co - Springfield Mill	☐	☐	☒	Discharges are regulated by a DEQ issued Individual NPDES Permit and this facility does not discharge process wastewater to the Eugene/Springfield POTW.
Kingsford Manufacturing Company - Springfield Plant	☐	☐	☒	Discharges are regulated by a DEQ issued Individual NPDES Permit and this facility does not discharge process wastewater to the Eugene/Springfield POTW.

Source Categories	Mercury			Notes/Comments
	Current	Potential	N/A	
Seneca Sawmill Company	☐	☐	☒	Discharges are regulated by a DEQ issued Individual NPDES Permit and this facility does not discharge process wastewater to the Eugene/Springfield POTW.

3. Implementation Plan for Mercury Management and Reduction Measures for (at least) the Next Five Years

Overview

Target Audiences:

Industries – Primarily Indirect Sources
Dental Offices – Direct Sources
Landfill – Indirect Sources
Medical Facilities – Indirect Sources
Commercial Laboratories – Direct and Indirect Sources
Higher Level Educational Faculties – Direct and Indirect Sources

Timeline:

- Rollout of engagement deliverables will begin upon DEQ approval.
- For full implementation, we anticipate a 1-year period to reach all key audiences.
- After 6 months, regional pretreatment staff will conduct a Preliminary Evaluation of the implementation of the Community Engagement Plan. This includes review for successful tactics and messaging, identifying needed improvements and other opportunities.

Tactics:

Table 2. Mercury Reduction Tactic Summary

Tactic	Audience	Description	Assigned Staff
Postcards	Industries or businesses actively interacting with mercury	Oversized postcards with simplified text and graphics, communicating specific, concise messages about mercury pollution prevention, material substitution & recovery, and spill & waste management	Development by MWMC Communications staff, distribution by local and regional pretreatment staff
Website	General audience, MWMC service area	Place mercury information on the MWMC Pollution Prevention webpage	MWMC communications staff
Handout	Industries and businesses	Create and distribute a printed handout with comprehensive information on mercury pollution prevention, material substitution & recovery, and spill & waste	Development by MWMC Communications staff, distribution by pretreatment staff

Tactic	Audience	Description	Assigned Staff
		management (including direct and indirect sources)	
Poster	Industries and businesses	Create and distribute a mercury pollution prevention training/awareness poster that can be placed in employee common areas	Development by MWMC Communications staff, distribution by local and regional pretreatment staff
Social Media	General audience, MWMC service area	Incorporate mercury messaging into regular MWMC pollution prevention messaging on social media platforms	MWMC communications staff
Newsletter	General audience, MWMC service area	Incorporate mercury messaging into regular MWMC pollution prevention messaging in our monthly newsletter	MWMC communications staff
Direct Outreach	Industries and businesses	Directly communicate via email, phone call, and face-to-face with key personnel at industries and businesses to help educate them on mercury and help them develop best management practices that include material substitution & recovery, and spill & waste management	Local pretreatment staff assigned to permitted industries and businesses

See Appendix I - MWMC Preliminary Mercury Minimization Community Engagement Plan

4. Facility Changes

Facility
Lagoon Decommissioning – MWMC removed a lagoon from the regional WPCF at 410 River Avenue and it was assumed that the sediment contained trace amounts of mercury. Sediment from the lagoon was removed from the site and disposed per the requirements of a Lane County Special Waste permit.

Collection System
No substantive changes have been made to the collection system that would impact mercury concentrations.

Changes in Industrial Users (added or removed)
In the last five years, the Cities of Eugene and Springfield have not issued any new wastewater discharge permits.

Changes in Source Water Supply
There have not been any changes to the water supply that are expected to have an impact on mercury concentrations.

5. Mercury Monitoring (total mercury)

Table 3. Collection System Monitoring for Mercury

Location	Sample Type	Form of Mercury	Method	Analytical Limit	Analytical Results	Units
48th Street, LLC L0860003	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.066	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.061	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.068	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22165	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	0.171	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L

Location	Sample Type	Form of Mercury	Method	Analytical Limit	Analytical Results	Units
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.088	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	0.153	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	0.189	ug/L
MH-22235	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	0.059	ug/L
SAN-001	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.16	ug/L
SAN-002	Collection System	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.062	ug/L

Table 4. Municipal Monitoring for Mercury

Location	Sample Type	Form of Mercury	Method	Analytical Limit	Analytical Results	Units
Lane County Truck Wash LC-003	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.062	ug/L
Vactor Site S51	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	0.105	ug/L
Vactor Site S51	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Vactor Site S51	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Vactor Site S51	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Vactor Site S51	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.086	ug/L
Vactor Site S51	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Vactor Site S51	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Vactor Site S51	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
Short Mountain Landfill LC-001	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Short Mountain Landfill LC-001	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Short Mountain Landfill LC-001	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Short Mountain Landfill LC-001	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Short Mountain Landfill LC-001	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Short Mountain Landfill LC-001	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Short Mountain Landfill LC-001	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Short Mountain Landfill LC-001	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Short Mountain Landfill LC-001	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L

Location	Sample Type	Form of Mercury	Method	Analytical Limit	Analytical Results	Units
Willamalane Park & Recreation District N1240001	Municipal	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.273	ug/L

Table 5. Industrial Monitoring for Mercury

Location	Sample Type	Form of Mercury	Method	Analytical Limit	Analytical Results	Units
ALSCO S1	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	0.068	ug/L
ALSCO S1	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
ALSCO S1	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.085	ug/L
Altech S48 (SUMP)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Altech S48 (SUMP)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Altech S48 (SUMP)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.062	ug/L
Arauco North America, Inc.ARA-001	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Arauco North America, Inc.ARA-001	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Arauco North America, Inc.ARA-001	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Arclin USA H0940001	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
BowTech S69 (Airport Rd)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
BowTech S69 (Airport Rd)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.124	ug/L
BowTech S69 (Airport Rd)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
BowTech S70	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
BowTech S70	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L

Location	Sample Type	Form of Mercury	Method	Analytical Limit	Analytical Results	Units
BowTech S70	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
BowTech S71	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
BowTech S71	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
BowTech S71	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Emerald Forest S8	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Farwest Steel #1	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Forrest Paints S50	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Forrest Paints S50	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Forrest Paints S50	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Franz Bakery FB001	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Gheen Irrigation S10	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Hexion D1010016	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Hop Valley Brewing S81	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Hop Valley Brewing S81	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Hop Valley Brewing S81	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.102	ug/L
International paper; K0850005	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
McKenzie Willamette Medical Center	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Molecular Probes S65	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Molecular Probes S65	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Molecular Probes S65	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Murphy Plywood S55	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L

Location	Sample Type	Form of Mercury	Method	Analytical Limit	Analytical Results	Units
Murphy Plywood S55	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Murphy Plywood S55	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
NinkasiBrewing-S78	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
NinkasiBrewing-S78	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
NinkasiBrewing-S78	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.106	ug/L
Oregon Ice Cream Co. S77	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Oregon Ice Cream Co. S77	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Oregon Ice Cream Co. S77	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Peace Health Annex	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Peace Health Annex	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Peace Health Annex	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Peace Health Annex	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Peace Health Annex	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Peace Health Annex	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Peace Health Annex	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Peace Health Annex	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.133	ug/L
Peace Health RiverBend-1	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L

Location	Sample Type	Form of Mercury	Method	Analytical Limit	Analytical Results	Units
Peace Health RiverBend-2	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Peace Health RiverBend-3	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Pierce S14 (SUMP)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Pierce S14 (SUMP)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Pierce S14 (SUMP)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Quality Metal S17	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Quality Metal S17	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Quality Metal S17	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Quality Metal S17	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Rosboro Lumber G101006	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.157	ug/L
Rosboro Lumber G105007	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
S44 CUB SAMPLE BOX	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
S44 CUB SAMPLE BOX	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
S44 CUB SAMPLE BOX	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Spfld. Creamery S30	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Spfld. Creamery S30	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Spfld. Creamery S30	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.07	ug/L
Sup. Steel Fab.-S68(5stage)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Sup. Steel Fab.-S68(5stage)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L

Location	Sample Type	Form of Mercury	Method	Analytical Limit	Analytical Results	Units
Sup. Steel Fab.-S68(5stage)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Swanson Group MFG., LLC SGM-001	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Turtle Mountain-TMM01	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Turtle Mountain-TMS01	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
U of O S21 (KLAM N.)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	0.174	ug/L
U of O S21 (KLAM N.)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.107	ug/L
U of O S22 (KLAM E.)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	0.118	ug/L
U of O S22 (KLAM E.)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.186	ug/L
U of O S23 (GEOL N.)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	0.08	ug/L
U of O S23 (GEOL N.)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
U of O S24 (CANOE N.)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	0.122	ug/L
U of O S24 (CANOE N.)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.161	ug/L
U of O S25 (LAWR N.)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
U of O S25 (LAWR N.)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.085	ug/L
U of O S79 (Lewis Science Building)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
U of O S79 (Lewis Science Building)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	0.109	ug/L

Location	Sample Type	Form of Mercury	Method	Analytical Limit	Analytical Results	Units
U of O S80 (Lorry I. Lokey Lab)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
U of O S80 (Lorry I. Lokey Lab)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
U of O S82 (Knight Campus)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
U of O S82 (Knight Campus)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
U of O S82 (Knight Campus)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
U of O S82 (Knight Campus)	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.1	Not detected	ug/L
Voith WMSUMP	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Willamette Valley Co.-S75	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.05	Not detected	ug/L
Willamette Valley Co.-S75	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L
Willamette Valley Co.-S75	Industrial	Mercury, Total	EPA 245.1 Rev. 3.0	0.06	Not detected	ug/L

6. Wastewater Treatment Plant Influent, Effluent and Biosolids Data

Table 6. Wastewater treatment plant calendar month average influent data (collected at headworks)

Date	Result (ug/L)	Quantitation Limit (ug/L)
1/16/2019	0.067	0.05
2/20/2019	0.072	0.05
3/20/2019	0.05	0.05
4/17/2019	Not detected	0.05
5/15/2019	0.123	0.05

Date	Result (ug/L)	Quantitation Limit (ug/L)
6/19/2019	Not detected	0.05
7/17/2019	0.066	0.05
8/21/2019	0.185	0.05
9/19/2019	0.086	0.05
10/17/2019	0.089	0.05
11/20/2019	0.051	0.05
12/23/2019	0.057	0.05
1/22/2020	Not detected	0.05
2/19/2020	0.073	0.06
3/18/2020	0.363	0.06
4/22/2020	0.082	0.06
5/20/2020	Not detected	0.06
6/17/2020	Not detected	0.06
7/15/2020	0.067	0.06
8/12/2020	Not detected	0.06
9/16/2020	0.051	0.06
10/21/2020	Not detected	0.06
11/18/2020	Not detected	0.06
12/21/2020	Not detected	0.06
1/20/2021	Not detected	0.06
2/17/2021	Not detected	0.06
3/17/2021	Not detected	0.06
4/21/2021	0.23	0.06
5/12/2021	0.084	0.06

Date	Result (ug/L)	Quantitation Limit (ug/L)
6/16/2021	0.103	0.06
7/21/2021	Not detected	0.06
8/18/2021	0.084	0.06
9/22/2021	Not detected	0.06
10/20/2021	0.259	0.06
11/18/2021	Not detected	0.06
12/8/2021	Not detected	0.06
1/20/2022	Not detected	0.06
2/16/2022	0.068	0.06
3/16/2022	Not detected	0.06
4/20/2022	Not detected	0.06
5/18/2022	Not detected	0.06
6/22/2022	0.078	0.06
8/17/2022	0.063	0.06
9/7/2022	0.069	0.06
10/19/2022	Not detected	0.06
November 2022 Average	0.0795	0.0005
January 2023 Average	0.03733	0.0005
November 2022 Average	0.05093	0.0005

Table 7. Wastewater treatment plant calendar month average effluent data (collected after final treatment)

Date	Result (ug/L)	Quantitation Limit (ug/L)
1/17/2019	0.00182	0.0005

Date	Result (ug/L)	Quantitation Limit (ug/L)
2/21/2019	0.00326	0.0005
3/21/2019	0.00263	0.0005
4/18/2019	0.00183	0.0005
5/16/2019	0.000978	0.0005
6/20/2019	0.00141	0.0005
7/18/2019	0.00136	0.0005
8/22/2019	0.00158	0.0005
9/20/2019	0.00121	0.0005
10/18/2019	0.00157	0.0005
11/21/2019	0.00235	0.0005
12/24/2019	0.00178	0.0005
1/23/2020	0.0016	0.0005
2/20/2020	0.00161	0.0005
3/19/2020	0.0013	0.0005
4/23/2020	0.00122	0.0005
5/21/2020	0.00113	0.0005
6/18/2020	0.00111	0.0005
7/16/2020	0.000928	0.0005
8/13/2020	0.00109	0.0005
9/17/2020	0.00109	0.0005
10/22/2020	0.00118	0.0005
11/20/2020	0.00174	0.0005
12/22/2020	0.00197	0.0005
1/21/2021	0.00167	0.0005

Date	Result (ug/L)	Quantitation Limit (ug/L)
2/18/2021	0.00127	0.0005
3/18/2021	0.0012	0.0005
4/22/2021	0.00104	0.0005
5/18/2021	0.00165	0.0005
6/17/2021	0.00142	0.0005
7/23/2021	0.00115	0.0005
8/19/2021	0.00117	0.0005
9/23/2021	0.0011	0.0005
10/21/2021	0.00299	0.0005
11/20/2021	0.00111	0.0005
12/9/2021	0.00139	0.0005
1/21/2022	0.00129	0.0005
2/16/2022	0.00104	0.0005
3/16/2022	0.00145	0.0005
4/20/2022	0.00139	0.0005
5/18/2022	0.00124	0.0005
6/22/2022	0.000898	0.0005
7/20/2022	0.000895	0.0005
8/17/2022	0.000867	0.0005
9/7/2022	0.00111	0.0005
10/19/2022	0.00131	0.0005
November 2022 Average	0.00188	0.0005
January 2023 Average	0.00175	0.0005

Date	Result (ug/L)	Quantitation Limit (ug/L)
November 2022 Average	0.00211	0.0005

Table 8. Wastewater treatment plant calendar month average biosolids data (collected at sludge holding tank near primaries)

Date	Result (ug/L)	Quantitation Limit (ug/L)
1/7/2019	0.83	0.22
4/8/2019	0.63	0.23
7/8/2019	1.3	1.05
10/7/2019	Not detected	0.92
1/6/2020	0.45	0.24
4/6/2020	0.49	0.02
7/23/2020	0.27	0.21
12/7/2020	0.32	0.22
1/11/2021	0.34	0.21
4/5/2021	0.23	0.2
10/4/2021	0.54	0.21
1/10/2022	0.4	0.2
4/18/2022	0.27	0.21
7/19/2022	0.36	0.22
10/3/2022	0.38	0.23
November 2022 Average	0.62	0.2
January 2023 Average	0.5	0.11
November 2022 Average	0.34	0.11

Table 9. Flow/Load Information

Water Pollution Control Facility (WPCF) Total Mercury Data Summary (2019- 2023)

Year	Total Mercury Concentrations			Liquid Steam Removal Efficiency (%)	Average Rates			Annual Mercury Loads		
	Influent (ng/l)	Effluent (ng/L)	Biosolids (mg/kg)		Influent (MGD)	Effluent (MGD)	Biosolids (dry ton/day)	Influent (lbs/yr)	Effluent (lbs/yr)	Biosolids (lbs/yr)
2019	74.7	1.8	0.81	97.6	33.2	33.1	6.46	7.55	0.18	3.82
2020	70.1	1.3	0.38	98.1	30.6	30.5	5.56	6.53	0.12	1.54
2021	80.8	1.4	0.37	98.2	32.5	32.2	7.27	7.99	0.14	1.96
2022	55.5	1.3	0.47	97.6	32.8	32.8	6.63	5.54	0.13	2.27
2023 [a]	48.9	1.6	0.46	96.8	30.2	30.2	7.77	4.50	0.15	2.61
2019 – 2023	66	1.5	0.50	97.7	31.9	31.8	6.74	6.42	0.14	2.44

[a] First full year of low-level mercury testing for WPCF influent.

Effluent concentrations and removal efficiencies demonstrate a high level of performance.

7. Mercury Measurements at Other Locations

Permit does not identify other locations to be monitored for mercury.

8. Summarize Mercury Reduction Activities Implemented during (at least) the Previous Five Years (from the date this plan was prepared)

Overview

The Cities of Eugene and Springfield have initiated mercury reduction activities in their service areas since the 1990s. They have worked with medical facilities, dental facilities, schools, industrial and commercial facilities, septage haulers, and residential sources to reduce mercury levels. The following is a summary of the actions that the Cities have taken in each of these areas:

Medical facilities

- Coordinated with the Lane Area Pollution Prevention Coalition and police departments to host drug take back events for the Public (2010 - Present).
- Coordinated with local police departments to install drug take back boxes and assisted in funding the purchase of drop off boxes (2011).

Dental facilities

- The Cities developed a Memorandum of Agreement with the Oregon Dental Association for voluntary implementation of Best Management Practices for dental offices. The program was designed to limit the discharge of mercury and silver discharging into the regional wastewater collection system (2007).
    - Information distributed to 143 Dental Facilities.
- Dental Amalgam Inspection and Certification Program (2017 – Present)
    - Oregon adopted a statute in 2011 requiring dentists to install and maintain amalgam separators and follow Best Management Practices. On July 14, 2017, the EPA published Effluent Limitations, Guidelines and Standards for Dental Offices (40 CFR 441) in the Federal Register, which established national standards for dental offices that place or replace dental amalgam, discharge to the sanitary system and limit mercury discharge to publicly owned treatment works.
    - The Cities of Eugene and Springfield completed an initial notification to all existing source dental facilities on April 10, 2019. Both cities have systems in place to identify new source dental facilities.
    - Between 2010-2014, 101 inspections were conducted at 104 dental offices. The inspections included evaluating the installation and maintenance of the amalgam separator, the disposal of amalgam, silver and lead waste, and the use of non-oxidizing cleaners.
    - The Cities of Eugene and Springfield have verified that 100% of the dental facilities within their jurisdictions are in compliance with EPA requirements.

Schools

- Participated in a DEQ 319 Grant with the Association of Clean Water Agencies (ACWA) to develop educational materials to remove mercury from schools (2002).
- Surveyed 4 local high schools in the 4J School District for Mercury containing products; removed and replaced mercury containing products with non-mercury items with DEQ Grant funds obtained through ACWA (2002-2003).
    - Removed and replaced 136 thermometers and five free-standing wall-mounted barometers. Each barometer contained 1 lb. of mercury.
    - Mercury containing lab chemicals were removed.
    - The school district recycled 3,014 fluorescent tubes prompted by the mercury cleanout. The tubes contained 20-80 grams of mercury.
- Many public schools have recently been rebuilt and replaced to address seismic concerns and antiquated mercury containing hardware (thermostats, lightbulbs, etc.) has been removed and replaced with mercury free products.

Industrial and Commercial Facilities

- The original Pretreatment Program was accepted and approved by the Oregon DEQ in July 1983. The program was originally incorporated into the NPDES Permit issued to the Metropolitan Wastewater Management Commission (MWMC) and to the Cities of Eugene and Springfield on August 1, 1983.
    - Wastewater discharges from all significant industrial users (SIUs) are monitored for mercury on a regular basis to ensure compliance with the approved local limits. The mercury concentration in these discharges did not warrant the need for industries to develop their own mercury minimization plans.
    - New and existing businesses are evaluated on an ongoing basis to ensure compliance with federal, state, and local requirements.
    - All permitted significant industrial users are required to develop and implement Accidental Spill Prevention and Response Plans.
- The Cities of Eugene and Springfield developed a pollution management fact sheet and poster for local Radiator Shops. The information was distributed via an educational site visit (1997).

- The Cities of Springfield and Eugene coordinated with ACWA to produce a brochure for various commercial sectors including auto repair shops, print shops and dentists. Each brochure was tailored with pollution prevention tips. Brochures were distributed to the area businesses (1997-1998).
- Participated in Oregon's The Mercury Solution Team to develop strategies to eliminate the release of mercury from human activities in Oregon by 2020. The Team, comprised of Public, Private and Non-Profit entities, produced the report, Mercury, On the Road to Zero, (December 2001). The Team categorized sources of mercury in Oregon and recommended strategies to reduce/eliminate mercury in the environment (2001).
- Photographic Processors General Requirement (1996 - Present)
    - The cities executed the General Requirement to Install and Maintain Wastewater Treatment Equipment and Implement Pollution Management Practices for Photographic Processors. Approximately 125 photographic businesses in Eugene and 20 Springfield businesses were notified of the requirement.
    - As digital technology has become more prevalent, the amount of traditional photo processing has significantly decreased. There are currently 10 photographic businesses operating under General Requirements in Eugene and there are not any photographic businesses in Springfield.
- Lane Area Pollution Prevention Coalition (Lane P2C) (1997 - Present)
  The Cities of Springfield and Eugene coordinated the implementation of Lane P2C, which is a consortium of local agencies consisting of City of Eugene, City of Springfield, Eugene Water and Electric Board, Lane County Public Works, Lane Regional Air Protection Agency, Oregon Department of Environmental Quality and Springfield Utility Board. The goals of the consortium are to:
    - Incorporate pollution prevention measures into agency programs.
    - Avoid duplication of pollution prevention efforts.
    - Develop multi-media environmental messages and preventative solutions.
    - Share resources for collaborative pollution prevention projects.
    - Enhance efficiency in the delivery of pollution prevention services.
    - Provide consistent regional environmental messaging.
    - Improve communication between agencies, and
    - Support existing agency missions.

- Ecological Business Certification Program for Automotive Shops (2003 – Present)
    - Adopted the Statewide Ecological Business Program for Automotive Shops. In coordination with Lane Area Pollution Prevention Coalition the city of Eugene and City of Springfield implemented the Ecological Business (Ecobiz) Program in Lane County. Currently, BRING is contracted to implement the program in this area. The program provides technical assistance to automotive shops to assist them in going beyond the minimum regulatory requirements to reduce their impact on air, water, solid waste, and hazardous waste and to implement recycling, reuse and alternative products program. Automotive shops that obtained the high standards were Ecobiz certified. A component of this program is to promote the collection and recycling of mercury filled trunk switches from vehicles.
- The Cities of Eugene and Springfield's industrial stormwater management programs review activities occurring within their jurisdictions to determine if these activities require coverage under a NPDES Permit. As an Agent of DEQ, the City of Eugene administers the 1200-Z NPDES General Industrial Stormwater Discharge Permits within its' jurisdiction on behalf of the State of Oregon. Waste management practices are identified as a part of this review.

Residential, collection systems, and septage sources

- Developed Mercury Thermometer exchange program through local Lane Area Pollution Prevention Program (2001-2008).
- Provided funds for mercury free thermometers and distributed at Home Show events (2001-2008).
- Participated in Oregon's The Mercury Solution Team to develop strategies to eliminate the release of mercury from human activities in Oregon by 2020. The Team, comprised of Public, Private and Non-Profit entities that produced the report entitled; Mercury, On the Road to Zero (December 2001). The Team categorized sources of mercury in Oregon and recommended strategies to reduce/eliminate mercury in the environment (2001).
- Household Hazardous Waste Disposal - Support existing efforts and programs within the Eugene metro area to inform citizens of local opportunities for the proper discard and disposal of their household hazardous waste materials. Support and promote facilities and programs that provide such opportunities.
- Regularly update the City's web site to direct residents to the latest information about recycling and waste prevention news, resources, and local events.
- Solid Waste Management - Evaluate and revise, as necessary, existing solid waste and recycling collection rules to address stormwater quality.
    - Review Administrative Rule to ensure regulations are up to date and include requirements to support appropriate waste management and prevention.
    - Contract with Oregon DEQ for a waste composition study. (2021)

Table 10. MMP Evaluation

MMP Action	Evaluation	Conclusions
Medical Facilities	Drug take-back programs, waste disposal, and general housekeeping	Program is effective and support for drug take-back programs will continue. Medical facilities could benefit from additional outreach efforts.
Dental Facilities	No instances of non-compliance were identified during site inspections.	Program is effective, new dental offices will continue to be inspected to ensure compliance.
Industrial and Commercial Facilities	Pretreatment Wastewater Discharge Permits, General Requirements, EcoBiz, and Outreach	Program is effective, new and existing businesses will continue to be evaluated to determine if a discharge permit, general requirements, or outreach is needed.
Residential, Collection Systems, and Septage Sources	Lane County Household Hazardous Waste Program and Public Education/Outreach	Program is effective as it provides the public with an accessible and free to low-cost option for disposing of household hazardous waste (thermometers, thermostats, lightbulbs, etc.). The public could benefit from additional education/outreach efforts.

9. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Preparer (please print): Contrail Smith

Title: Regulatory Services Supervisor Date 10/10/24

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Appendix I

MWMC Mercury Minimization Community Engagement Plan

MWMC Mercury Minimization Community Engagement Plan

Introduction:
The Metropolitan Wastewater Management Commission (MWMC), in cooperation with the City of Eugene and the City of Springfield, has developed a Mercury Minimization Plan (MMP). This plan will continue pre-existing work local and regional staff have done to prevent the introduction of mercury into wastewater and expand the MWMC's community outreach regarding mercury pollution.

Eugene and Springfield have not historically seen large uses of mercury in local industries, and this plan will reflect the residential makeup of the MWMC service area. Staff will employ both general communication about mercury for the broader Eugene-Springfield community, as well as targeted communication with businesses and industries known to use mercury in their processes or that have had detectable levels of mercury in the past.

Project Purpose:
In compliance with the MWMC's National Pollutant Discharge Elimination System (NPDES) permit, issued by the Oregon Department of Environmental Quality (DEQ) in November 2022, regional pretreatment staff have developed the MMP to continue protecting the MWMC regional wastewater treatment plant from influent mercury contamination. By extension, this also protects the MWMC's biosolids production, the Willamette River, and the local community and environment.

Project Goal:
The MWMC's goal is to standardize previous efforts to minimize mercury pollution in the wastewater system and outline new analysis and efforts to cover potential sources of mercury in the MWMC's service area. While the MWMC does not currently and has not historically experienced high levels of mercury pollution, staff will take preventative measures to mitigate the risk of mercury making its way into the wastewater system.

Project Objective:
The MWMC will produce a Mercury Minimization Plan that will be shared in common between regional and local staff. The MMP will be submitted to DEQ for approval by or before November 15, 2024. The MMP will be implemented upon approval, guiding the MWMC and local partners efforts to

create a cohesive mercury minimization effort, clearly delegating tasks and responsibilities where appropriate.

Key Messages:

1. Direct sources of mercury into wastewater should be separated for off-site disposal.
    a. Replace sewer drain traps and perform routine maintenance.
2. Indirect sources of mercury should be eliminated from supply chains.
    a. Develop and implement mercury-free purchasing plans.
        i. For general audience, purchase mercury-free products.
    b. Use old inventory with mercury to eliminate it quickly.
    c. Reduce bulk purchasing of expirable supplies to reduce waste.
    d. Clearly label items containing mercury.
    e. Store fluorescent bulbs in containers before and after use.
    f. Replace fluorescent lighting with LED lighting.
    g. Mercury sources cannot be incinerated.
3. Provide training to employees on how to properly clean and dispose of sources of mercury.

Community Engagement Audiences:

1. Local Industries (primarily indirect sources)
2. Dental offices (direct sources)
3. University of Oregon (direct and indirect sources)
4. Medical facilities (indirect sources)
5. Residential complexes (apartments, townhomes, etc.) (indirect sources)
6. Commercial Laboratories (direct and indirect sources)
7. K – 12 Schools (indirect sources)
8. General service area audience (indirect sources)

Tactics:

Tactic	Audience	Description	Budget	Assigned Staff
Postcards	Industries or businesses actively interacting with mercury	Oversized postcards with simplified text and graphics, communicating specific, concise messages about mercury pollution prevention, material substitution & recovery, and spill & waste management		Development by MWMC Communications staff, distribution by local and regional pretreatment staff
Website	General audience, MWMC service area	Place mercury information on the MWMC Pollution Prevention webpage		MWMC communications staff
Handout	Industries and businesses	Create and distribute a printed handout with comprehensive information on mercury pollution prevention, material substitution & recovery, and spill & waste management including direct and indirect sources		Development by MWMC Communications staff, distribution by local and regional pretreatment staff
Poster	Industries and businesses	Create and distribute a mercury pollution prevention training/awareness poster that can be placed in employee common areas		Development by MWMC Communications staff, distribution by local and

Tactic	Audience	Description	Budget	Assigned Staff
				regional pretreatment staff
Social Media	General audience, MWMC service area	Incorporate mercury messaging into regular MWMC pollution prevention messaging on social media platforms		MWMC communications staff
Newsletter	General audience, MWMC service area	Incorporate mercury messaging into regular MWMC pollution prevention messaging in our monthly newsletter		MWMC communications staff
Direct Outreach	Industries and businesses	Directly communicate via email, phone call, and face-to-face with key personnel at industries and businesses to help educate them on mercury and help them develop best management practices that include material substitution & recovery, and spill & waste management		Local pretreatment staff assigned to permitted industries and businesses

Measures of Success

The MWMC will examine Key Performance Indicators (KPI's) to evaluate the effectiveness of community engagement and outreach efforts. KPI's will include:

- Wastewater stream samples tested for mercury.
- Industrial and business compliance with mercury minimization policies.
- Website traffic to pages with mercury information.
- Newsletter readership (for newsletters containing pollution prevention information about mercury).
- Social media engagement metrics with posts containing information about mercury.

Timeline:

- Rollout of engagement deliverables will begin upon DEQ approval.
- For full implementation, we anticipate a 1-year period to reach all key audiences with initial outreach.
- After 6 months, regional and local pretreatment staff will conduct a Preliminary Evaluation of the implementation of the Community Engagement Plan, reviewing for successful tactics and messaging, needed improvements, and other opportunities.
- After the first year of implementation, pretreatment staff will continue to make mercury minimization resources available to permitted industries on an annual basis and other audiences as needed.
- MWMC communications staff will, as appropriate, include mercury minimization in their regular pollution prevention communications (e.g., monthly newsletter, social media posts).