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## Attachment to Variance Application for Mercury for Industrial and Similar Facilities

September 14, 2012

**Notice:** This form must be completed and submitted to the Department to request the variance. Failure to provide all requested information may result in denial of your application. Personally identifiable information collected on this form will be used to administer the watershed management program and may be provided to requestors as required by Wisconsin Open Records law [ss. 19.31, Wis. Stats.]

Facility and Permit Information
WPDES Permit No.
Facility Name
<p><b>1. Specifically, what steps do you plan to undertake (and when) in the next 5-year permit term to reduce levels of the pollutant mercury to the treatment plant?</b> – Examples: Developed a plan to phase-out mercury-containing devices. Implemented a chemical management program that includes pre-purchase review and approval. Established mercury management protocols for safe handling, mercury spill clean up procedures, disposal procedures, and education and training of employees about these protocols. Inventoried all mercury-containing devices (such as switches, thermostats, etc). Labeled mercury-containing devices to recycle at the end of life. Implemented a program to recycle fluorescent lamps. Properly recover and recycle elemental mercury and mercury-containing products. Requested certificates of analysis for bulk chemicals known to have potential mercury contamination. Reduced the use of mercury-containing chemicals as much as feasible. Inventoried mercury-containing lab chemicals, thermometers and other devices with a plan for non-mercury product substitution.</p>
<p><b>2. How significant are the reductions you expect with the steps described above?</b>– Examples: Show expected levels that can be attained over the next five years.</p>

**3. What is the history of variances at your facility?** – Examples: previous variances and previous permit limits, significant changes and efforts made to reduce discharges. Dates of Pollutant Minimization Plans (PMP) or other plans. Status of annual reports. Summary of steps that have been already taken.

**4. Provide trend analysis dating back to before the implementation of PMP or other variance steps.** – Examples: Include influent and effluent data. For mercury include all data and show trends including sludge data. For the pollutant include mass and concentration trends. Reference or attach any facility planning or evaluation study that evaluated facility performance capabilities (Note – Only include studies that are recent or otherwise applicable for the evaluation of the existing facility and current conditions).

**Variance Request and Certification**

Based on the information provided, I am requesting a variance on the basis that attainment of the applicable water quality standard may cause substantial and widespread adverse social and economic impacts in the area where this discharge is located.

I certify that the information provided is true, accurate and complete.

Print or type name of individual submitting request (must be an Authorized Representative for the treatment facility)	Title
Signature of Official	Date Signed