State of Wisconsin
Department of Natural Resources
PO Box 7921, Madison WI 53707-7921
dnr.wi.gov

Mercury Variance Application

Form 3400-192 (R 4/06)

Notice: Information requested is required for the Department to determine whether or not to grant a variance under the provisions of section NR 106.145, Wis. Adm. Code. Failure to provide all of the requested information may result in denial of your application. Personal information collected will be used to administer the watershed program and may be provided to requesters as required by Wisconsin's Open Records law [ss. 19.31-19.39, Wis. Stats.]

Applicant Information

Company Name: City of Oshkosh	Contact Name: Stephan Brand
WPDES Permit No.: 0025083-07	Street Address: 215 Church Ave
Facility Name: Oshkosh Wastewater Treatment Facilty	City: Oshkosh; State: WI; ZIP Code: 54903
Street Address: 233 N Campbell	Telephone Number (include area code): (920)232-5365; FAX Number: (920)232-5366
City: Oshkosh; State: WI; ZIP Code: 54902	E-mail Address: sbrand@ci.oshkosh.wi.us
Receiving Water: Fox River	Source of Water Supply: Lake Winnebago; Average Discharge Flow Rate: 12.5 MGD

Alternatives

What are the primary sources of mercury to your facility? The primary expected sources are: Dental Facilities, Medical Facilities, Schools and certain Industrial Facilities.

What feasible actions (e.g. pollution prevention or installation of treatment) have you taken and could you take to reduce mercury discharge levels sufficiently to meet, or make progress toward meeting, the water quality based effluent limit?

Pollution Prevention: implementation of Pollution Minimization Program for mercury.

What types of waste materials or byproducts would be produced by these steps and what would be the ultimate means of disposal of those wastes?

N/A

What are the estimated costs of these actions?	How do these costs compare with current costs?
Capital $	
Annual Operational $ 10,000	

If this is a new discharge, what danger to public health or welfare would this variance help alleviate?

N/A

Pollutant Minimization Program (PMP)

If you have not previously submitted a PMP plan, submit it with this application or provide an explanation of why you cannot submit it now. If you have already submitted the plan or have begun to implement the PMP program, provide an update on your actions and success implementing the PMP.

See attached mercury Pollution Minimization Program narrative for 2010.

Other Information

Supply any other information that you believe may be relevant to your request.

Test Data: Supply mercury data on page 2 of this form.

Certification

Based on the information provided, I believe that attainment of the applicable water quality standards for mercury may cause substantial and widespread adverse social and economic impacts in the area where this discharge is located. I understand that, as a condition of the variance, the Department and the permittee will need to agree upon an alternative effluent limitation and specific language incorporating the PMP. I understand that these conditions will be included in the WPDES permit issued to this facility.

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

Individual Submitting Request (Individual must be an Authorized Representative): Mark A. Rabhoff	Title: City Manager
Signature of Official: [signature]	Date Signed: 6/29/2011

Mercury Pollutant Minimization Program
City of Oshkosh Wastewater Treatment Facility
WPDES Permit No. 0025038
Program Narrative for 2010

General Information: The focus for 2010 has been on the implementation of the dental amalgam separator program, and monitoring of the dental facilities amalgam waste management reports. Following up on the contacts made with the schools, and medical facilities, also industrial inspections occurred in 2010.

Medical Facilities: All medical facilities have implemented BMPs in 2009 except Valley Veterinary Hospital which has scheduled to implement. Valley Veterinary Hospital has not filed a report form to date and will be contacted by site visit again in 2011 to determine appropriate action to follow.

Dental Facilities: In 2010 all of the facilities contacted have implemented BMPs. Follow up will occur with all dentists in order to track amalgam disposal records and to confirm the use of amalgam separators.

School and Educational Facilities: All schools and educational facilities have implemented BMPs in 2009. Follow up contact has occurred in 2010 via telephone communication.

Industrial Facilities: Of the fifteen facilities contacted, twelve have either implemented or scheduled BMPs. One facility that has had a wastewater analysis performed has not implemented or scheduled BMPs. One facility has implemented waste control of mercury but has yet to survey and list existing equipment with mercury that will need to be monitored for future disposal control. The BMP program for industry was further discussed with each facility during their industrial pre-treatment program site inspection in 2010.

SMB/smb

I:dept\wwtp\annualreports\pmp
Rev 1Date 12-20-07
Rev 2 12-23-08
Rev 3 12-22-09
Rev 4 12-20-10

Mercury Data to Support Variance Request or Determination of Reasonable Potential

Make additional copies if necessary.

Laboratory Results of Testing (express all results in ng/L)												
Sample Date	Sample Type *	Treatment System **Influent** (if tested)	**Influent** - Limit of Detection (LOD)	**Influent** - Limit of Quantitation (LOQ)	Sample Date	Sample Type *	**Effluent** to Surface Water	**Effluent** - Limit of Detection (LOD)	**Effluent** - Limit of Quantitation (LOQ)	Intake (if water supply is surface water)	Blank Trip / Field	Laboratory Name
4/19/2006	Comp	140	3.3	10	4/19/2006	Comp	4.2	0.36	1.2	x	none	Northern Lake Service Inc-721026460
5/2/2006	Comp	110	3.3	10	5/2/2006	Comp	3.9	0.36	1.2	x	Trip < 0.36	Northern Lake Service Inc-721026460
6/6/2006	Comp	180	3.3	10	6/7/2006	Grab	4.0	0.36	1.2	x	none	Northern Lake Service Inc-721026460
7/5/2006	Grab	31	3.3	10	7/5/2006	Grab	4.5	0.36	1.2	x	Trip < 0.36	Northern Lake Service Inc-721026460
8/1/2006	Comp	55	3.3	10	8/2/2006	Grab	1.5	0.13	0.45	x	none	Northern Lake Service Inc-721026460
9/5/2006	Comp	100	3.3	10	9/6/2006	Grab	2.1	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
10/3/2006	Comp	49	3.3	10	10/4/2006	Grab	2.3	0.13	0.45	x	none	Northern Lake Service Inc-721026460
11/7/2006	Comp	38	3.3	10	11/8/2006	Grab	2.4	0.13	0.45	x	Trip < 0.13	Northern Lake Service Inc-721026460
12/5/2006	Comp	510	17.0	50	12/6/2006	Grab	3.1	0.13	0.45	x	none	Northern Lake Service Inc-721026460

* Describe sample type as composite or grab for all samples.

Mercury Data to Support Variance Request or Determination of Reasonable Potential

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Laboratory Results of Testing (express all results in ng/L)												
Sample Date	Sample Type *	Treatment System **Influent** (if tested)	**Influent** - Limit of Detection (LOD)	**Influent** - Limit of Quantitation (LOQ)	Sample Date	Sample Type *	**Effluent** to Surface Water	**Effluent** - Limit of Detection (LOD)	**Effluent** - Limit of Quantitation (LOQ)	Intake (if water supply is surface water)	Blank Trip / Field	Laboratory Name
1/2/2007	Comp	470	3.3	10	1/3/2007	Grab	2.0	0.13	0.45	x	Trip < 0.13	Northern Lake Service Inc-721026460
2/6/2007	Comp	49	3.3	10	2/7/2007	Grab	1.4	0.13	0.45	x	none	Northern Lake Service Inc-721026460
3/6/2007	Comp	52	3.3	10	3/6/2007	Comp	1.6	0.13	0.45	x	Trip < 3.3	Northern Lake Service Inc-721026460
4/4/2007	Grab	30	3.3	10	4/4/2007	Grab	2.0	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
5/1/2007	Comp	34	3.3	10	5/1/2011	Grab	1.4	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
6/5/2007	Comp	160	3.3	10	6/6/2007	Grab	1.9	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
5/3/2007	Comp	19	3.3	10	5/4/2007	Grab	1.6	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
8/7/2007	Comp	72	3.3	10	8/8/2007	Grab	1.2	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
9/4/2007	Comp	18	3.3	10	9/5/2007	Grab	3.5	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
10/2/2007	Comp	200	3.3	10	10/3/2007	Grab	2.0	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
11/6/2007	Comp	45	3.3	10	11/7/2007	Grab	1.8	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
12/4/2007	Comp	100	3.3	10	12/5/2007	Grab	1.6	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460

* Describe sample type as composite or grab for all samples.

Mercury Data to Support Variance Request or Determination of Reasonable Potential

Make additional copies if necessary.

Laboratory Results of Testing (express all results in ng/L)												
Sample Date	Sample Type *	Treatment System **Influent** (if tested)	**Influent** - Limit of Detection (LOD)	**Influent** - Limit of Quantitation (LOQ)	Sample Date	Sample Type *	**Effluent** to Surface Water	**Effluent** - Limit of Detection (LOD)	**Effluent** - Limit of Quantitation (LOQ)	Intake (if water supply is surface water)	Blank Trip / Field	Laboratory Name
1/1/2008	Comp	18	3.3	10	1/2/2008	Grab	1.2	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
2/5/2008	Comp	55	6.6	20	2/6/2008	Grab	1.8	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
3/4/2008	Comp	14	3.3	10	3/5/2008	Grab	1.2	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
4/1/2008	Comp	59	3.3	10	4/2/2008	Grab	2.7	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
5/6/2008	Comp	31	3.3	10	5/7/2008	Grab	1.2	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
6/3/2008	Comp	120	3.3	10	6/4/2008	Grab	1.9	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
7/1/2008	Comp	52	3.3	10	7/2/2008	Grab	1.7	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
8/5/2008	Comp	32	3.3	10	8/6/2008	Grab	0.82	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
9/2/2008	Comp	45	3.3	10	9/3/2008	Grab	2.5	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
10/7/2008	Comp	69	3.3	10	10/8/2008	Grab	0.64	0.13	0.45	x	Field 0.19	Northern Lake Service Inc-721026460
11/4/2008	Comp	54	3.3	10	11/5/2008	Grab	1.6	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
12/2/2008	Comp	36	3.3	10	12/3/2008	Comp	2.9	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460

* Describe sample type as composite or grab for all samples.

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Sample Date	Sample Type *	Treatment System **Influent** (if tested)	**Influent** - Limit of Detection (LOD)	**Influent** - Limit of Quantitation (LOQ)	Sample Date	Sample Type *	**Effluent** to Surface Water	**Effluent** - Limit of Detection (LOD)	**Effluent** - Limit of Quantitation (LOQ)	Intake (if water supply is surface water)	Blank Trip / Field	Laboratory Name
1/6/2009	Comp	32	3.3	10	1/7/2009	Grab	1.20	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
2/4/2009	Comp	38	3.3	10	2/5/2009	Grab	1.10	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
3/3/2009	Comp	22	3.3	10	3/4/2009	Grab	1.50	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
4/7/2009	Comp	23	3.3	10	4/8/2009	Grab	1.90	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
5/5/2009	Comp	29	3.3	10	5/6/2009	Grab	0.96	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
6/2/2009	Comp	29	3.3	10	6/3/2009	Grab	0.86	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
7/7/2009	Comp	100	3.3	10	7/8/2009	Grab	< 0.13	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
8/4/2009	Comp	47	3.3	10	8/5/2009	Grab	0.71	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
9/1/2009	Comp	290	3.3	10	9/2/2009	Grab	0.44	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
10/6/2009	Comp	110	6.6	20	10/7/2009	Grab	2.20	0.13	0.45	x	Field < 3.3	Northern Lake Service Inc-721026460
11/3/2009	Comp	37	3.3	10	11/4/2009	Grab	0.95	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
12/7/2009	Comp	38	3.3	10	12/8/2009	Grab	0.89	0.21	0.73	x	WW < 0.21	Northern Lake Service Inc-721026460

* Describe sample type as composite or grab for all samples.

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Laboratory Results of Testing (express all results in ng/L)												
Sample Date	Sample Type *	Treatment System **Influent** (if tested)	**Influent** - Limit of Detection (LOD)	**Influent** - Limit of Quantitation (LOQ)	Sample Date	Sample Type *	**Effluent** to Surface Water	**Effluent** - Limit of Detection (LOD)	**Effluent** - Limit of Quantitation (LOQ)	Intake (if water supply is surface water)	Blank Trip / Field	Laboratory Name
1/5/2010	Comp	25	3.3	10	1/6/2010	Grab	1.2	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
2/2/2010	Comp	22	3.3	10	2/3/2010	Grab	1.1	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
3/2/2010	Comp	27	3.3	10	3/3/2010	Grab	1.7	0.13	0.45	x	Field < 0.13	Northern Lake Service Inc-721026460
4/6/2010	Comp	37	3.3	10	4/7/2010	Grab	3.1	0.21	0.73	x	WW 6.3	Northern Lake Service Inc-721026460
5/11/2010	Comp	31	3.3	10	5/12/2010	Grab	1.5	0.21	0.73	x	WW < 0.21	Northern Lake Service Inc-721026460
6/8/2010	Comp	38	3.3	10	6/9/2010	Grab	1.9	0.21	0.73	x	Field < 0.21	Northern Lake Service Inc-721026460
7/6/2010	Comp	20	3.3	10	7/7/2010	Grab	0.95	0.21	0.73	x	Field < 0.21	Northern Lake Service Inc-721026460
8/3/2010	Comp	20	3.3	10	8/4/2010	Grab	1.2	0.21	0.73	x	Field < 0.21	Northern Lake Service Inc-721026460
9/7/2010	Comp	77	3.3	10	9/8/2010	Grab	0.92	0.21	0.73	x	Field < 0.21	Northern Lake Service Inc-721026460
10/6/2010	Comp	47	6.6	20	10/6/2010	Grab	1.4	0.21	0.73	x	Field < 0.21	Northern Lake Service Inc-721026460
11/2/2010	Comp	93	3.3	10	11/3/2010	Grab	1.2	0.21	0.73	x	Field < 0.21	Northern Lake Service Inc-721026460
12/7/2010	Comp	38	3.3	10	12/8/2010	Grab	0.89	0.21	0.73	x	WW < 0.21	Northern Lake Service Inc-721026460

* Describe sample type as composite or grab for all samples.

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Laboratory Results of Testing (express all results in ng/L)												
Sample Date	Sample Type *	Treatment System **Influent** (if tested)	**Influent** - Limit of Detection (LOD)	**Influent** - Limit of Quantitation (LOQ)	Sample Date	Sample Type *	**Effluent** to Surface Water	**Effluent** - Limit of Detection (LOD)	**Effluent** - Limit of Quantitation (LOQ)	Intake (if water supply is surface water)	Blank Trip / Field	Laboratory Name
1/4/2011	Comp	25	3.3	10	1/5/2011	Grab	1.3	0.21	0.73	x	Field < 0.21	Northern Lake Service Inc-721026460
2/1/2011	Comp	22	3.3	10	2/1/2011	Grab	1.5	0.21	0.73	x	Field < 0.21	Northern Lake Service Inc-721026460
3/8/2011	Comp	46	3.3	10	3/9/2011	Grab	1.5	0.25	0.84	x	Field < 0.25	Northern Lake Service Inc-721026460
4/5/2011	Comp	15	3.3	10	4/9/2011	Grab	1.0	0.25	0.84	x	Field < 0.25	Northern Lake Service Inc-721026460
5/3/2011	Comp	26	3.3	10	5/4/2011	Grab	1.5	0.25	0.84	x	Field < 0.25	Northern Lake Service Inc-721026460
										x		Northern Lake Service Inc-721026460
										x		Northern Lake Service Inc-721026460
										x		Northern Lake Service Inc-721026460
										x		Northern Lake Service Inc-721026460
										x		Northern Lake Service Inc-721026460
										x		Northern Lake Service Inc-721026460
										x		Northern Lake Service Inc-721026460

* Describe sample type as composite or grab for all samples.

FORM 3: Mercury PMP Summary of Treatment Plant Analytical Mercury Data

Influent		Effluent		Biosolids	
Date	Concentration ng/L	Date	Concentration ng/L	Date	Concentration mg/kg
10/7/2003	210	10/7/2003	3.08	10/1/2003	1.9
11/21/2003	169	11/4/2003	18.2		
12/3/2003	86.12	12/2/2003	3.19	12/3/2003	0.74
1/6/2004	106	1/6/2004	1.4		
2/3/2004	60	2/3/2004	1.44	2/4/2004	1.5
3/2/2004	34.4	3/2/2004	1.83		
				4/6/2004	2.5
5/4/2004	159	5/4/2004	2.15		
6/1/2004	22.8	6/1/2004	1.71	6/2/2004	1.0
7/7/2004	48.1	7/6/2004	1.42		
8/3/2004	120	8/3/2004	1.42	8/4/2004	1.0
9/7/2004	0.1	9/7/2004	1.65		
10/5/2004	93	10/5/2004	1.9	10/6/2004	1.3
11/2/2004	104	11/2/2004	1.5		
12/7/2004	96	12/7/2004	2	12/8/2004	0.97
1/4/2005	51	1/4/2005	2.5		
2/1/2005	78.7	2/1/2005	2.5	2/2/2005	1.1
3/1/2005	50	3/1/2005	2.3		
4/5/2005	226	4/4/2005	1.9	4/6/2005	1.2
5/3/2005	54	5/3/2005	3.0		
6/7/2005	195	6/7/2005	2.3	6/8/2005	0.74
7/5/2005	108	7/5/2005	1.45		
8/2/2005	226	8/2/2005	1.8	8/18/2005	0.9
9/6/2005	121	9/6/2005	1.2		
10/4/2005	94.5	10/4/2005	1.3	10/5/2005	1.3
11/1/2005	126	11/2/2005	1.2		
12/6/2005	93	12/7/2005	1.6	12/7/2005	1.8
1/3/2006	51.5	1/4/2006	2.2		

FORM 3: Mercury PMP Summary of Treatment Plant Analytical Mercury Data

Influent		Effluent		Biosolids	
Date	Concentration ng/L	Date	Concentration ng/L	Date	Concentration mg/kg
2/7/2006	63.5	2/8/2006	4.6	2/8/2006	3.3
3/7/2006	48.4	3/8/2006	1.4		
4/20/2006	140	4/21/2006	4.2	4/20/2006	0.32
5/3/2006	110	5/4/2006	3.9		
6/6/2006	180	6/7/2006	4.0	6/7/2006	0.56
7/4/2006	31	7/5/2006	4.5		
8/2/2006	55	8/3/2006	1.5	8/2/2006	0.34
9/5/2006	100	9/6/2006	2.1		
10/3/2006	49	10/4/2006	2.3	10/3/2006	0.18
11/7/2006	38	11/8/2006	2.4		
12/7/2006	510	12/6/2006	3.1	12/6/2006	0.18
1/2/2007	470	1/3/2007	2		
2/6/2007	49	2/5/2007	1.4	2/6/2007	0.035
3/7/2007	52	3/6/2007	1.6		
4/3/2007	30	4/4/2007	2	4/4/2007	0.24
5/1/2007	34	5/2/2007	1.4		
6/5/2007	160	6/6/2007	1.9	6/6/2007	0.18
7/4/2007	19	7/5/2007	1.6		
8/7/2007	72	8/8/2007	1.2	8/8/2007	0.37
9/4/2007	18	9/5/2007	3.5		
10/2/2007	200	10/3/2007	2	10/3/2007	0.33
11/6/2007	45	11/7/2007	1.8		
12/4/2007	100	12/5/2007	1.6	12/5/2007	0.033
1/1/2008	18	1/2/2008	1.2		
2/5/2008	55	2/6/2008	1.8	2/6/2008	0.52
3/4/2008	14	3/5/2008	1.2		
4/1/2008	59	4/2/2008	2.7	4/2/2008	0.17
5/6/2008	31	5/7/2008	1.2		
6/3/2008	120	6/4/2008	1.9	6/4/2008	0.089
7/1/2008	52	7/2/2008	1.7		
8/5/2008	32	8/6/2008	0.82	8/6/2008	0.13
9/2/2008	45	9/3/2008	2.5		
10/7/2008	69	10/8/2008	0.64	10/8/2008	0.3
11/4/2008	54	11/5/2008	1.6		
12/3/2008	36	12/3/2008	2.9	12/3/2008	0.48

FORM 3: Mercury PMP Summary of Treatment Plant Analytical Mercury Data

1/7/2009	32	1/7/2009	1.2		
2/5/2009	38	2/5/2009	1.1	2/5/2009	<0.074
3/4/2009	22	3/4/2009	1.5		
4/8/2009	23	4/8/2009	1.9	4/8/2009	0.11
5/6/2009	29	5/6/2009	0.96		
6/3/2009	29	6/3/2009	0.86	6/3/2009	0.099
7/8/2009	100	7/8/2009	<0.13		
8/5/2009	47	8/5/2009	0.71	8/5/2009	0.1
9/2/2009	290	9/2/2009	0.44		
10/7/2009	110	10/7/2009	2.2	10/6/2009	0.18
11/4/2009	37	11/4/2009	0.95		
12/1/2009	30	12/2/2009	0.77	12/2/2009	0.35
1/5/2010	25	1/6/2010	1.2		
2/2/2010	22	2/3/2010	1.1	2/3/2010	0.087
3/2/2010	27	3/3/2010	1.7		
4/6/2010	37	4/7/2010	3.1	4/7/2010	0.14
5/11/2010	31	5/12/2010	1.5		
6/8/2010	38	6/9/2010	1.9	6/9/2010	0.38
7/6/2010	20	7/7/2010	0.95		
8/3/2010	20	8/4/2010	1.2	8/4/2010	0.38
9/7/2010	77	9/8/2010	0.92		
10/5/2010	47	10/6/2010	1.4	10/6/2010	0.12
11/2/2010	93	11/3/2010	1.2		
12/7/2010	38	12/8/2010	0.89	12/8/2010	<0.025
1/4/2011	25	1/5/2011	1.3		
2/1/2011	22	2/2/2011	1.5	2/2/2011	0.22
3/8/2011	46	3/9/2011	1.5		
4/5/2011	15	4/6/2011	1	4/12/2011	0.47
5/3/2011	26	5/4/2011	1.5		
Average	**80.63868132**	Average	**2.008333333**	Average	**0.644159091**
Test Method	**1631E**	Test Method	**1631E**	Test Method	**EPA 7470A**
Average from 1 year ago	**38.91666667**	Average from 1 year ago	**1.411666667**	Average from 1 year ago	**0.242833333**
Average from 2 years ago	**66.08333333**	Average from 2 years ago	**1.338181818**	Average from 2 years ago	**0.1938**
Average from 3 years ago	**54.08333333**	Average from 3 years ago	**1.571666667**	Average from 3 years ago	**0.207**

Laboratory doing the wastewater analysis:	**Northern Lake Service, Badger Labs, Rand Brooks**
Laboratory doing the biosolids analysis:	**Northern Lake Service, Badger Labs, Rand Brooks**