


Archived: Thursday, January 25, 2024 8:38:20 AM
From: kbreckenridge@saltengineers.com
Sent: Friday, January 19, 2024 10:31:18 AM
To: [Guy Lester \(adpce.ad\)](#); [Thomas Harrington \(adpce.ad\)](#)
Subject: Clinton Mercury Minimization Plan
Importance: Normal
Attachments:
[wq-wwtp7-10.doc](#) 

Guy,

Will Hinchey has asked SALT to prepare a MMP for the City of Clinton. Do you have a DEQ approved go-by? I have attached a go-by from the State of Minnesota -if DEQ does not have a go-by, will this be sufficient?

The major items will include:

1. A summary of mercury influent and effluent concentrations and biosolids monitoring data using the most recent five years of monitoring data, if available.
2. Identification of existing and potential sources of mercury concentrations and/or loading to the facility.
3. An evaluation of past and present WWTP operations to determine those operating procedures that maximize mercury removal.
4. A summary of any mercury reduction activities implemented during the last five years.
5. A plan to implement mercury management and reduction measures during the next five years.

Thanks for any feedback you can offer.

Sincerely,

C. Kyle Breckenridge, P.E., BCCE, PSAP
kbreckenridge@saltengineers.com
cell: 501-766-9832



Archived: Thursday, January 18, 2024 12:15:37 PM
From: Guy Lester (adpce.ad)
Sent: Thursday, January 18, 2024 11:54:00 AM
To: 'kbreckenridge@saltengineers.com'; Thomas Harrington (adpce.ad)
Subject: RE: Mercury Minimization Plan
Importance: Normal

The last 4.5 years were for development of the MMP. The draft MMP was due January 1st.

Guy Lester, P.E. | Permit Engineer
Division of Environmental Quality | Office of Water Quality
NPDES Permits Section
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.519.0304 | e: Guy.Lester@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT

From: kbreckenridge@saltengineers.com <kbreckenridge@saltengineers.com>
Sent: Thursday, January 18, 2024 11:57 AM
To: Thomas Harrington (adpce.ad) <Thomas.Harrington@adeq.state.ar.us>; Guy Lester (adpce.ad) <Guy.Lester@adeq.state.ar.us>
Subject: RE: Mercury Minimization Plan

Clinton would submit the returned forms, once received, but I'm not sure if they have sent them out. I'll get a hold of Will to see where this stands and get his approval for the development of an MMP.

Thanks,

C. Kyle Breckenridge, P.E., BCEE, PSAP
kbreckenridge@saltengineers.com
cell: 501-766-9832



From: Thomas Harrington (adpce.ad) <Thomas.Harrington@adeq.state.ar.us>
Sent: Thursday, January 18, 2024 11:48 AM
To: Guy Lester (adpce.ad) <Guy.Lester@adeq.state.ar.us>
Cc: 'kbreckenridge@saltengineers.com' <kbreckenridge@saltengineers.com>
Subject: RE: Mercury Minimization Plan

That's what I was thinking too.

Kyle, I have attached a link to the permit for Clinton.

<https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/NPDES/Permits/AR0048836.pdf>

From: Guy Lester (adpce.ad) <Guy.Lester@adeq.state.ar.us>
Sent: Thursday, January 18, 2024 11:44 AM
To: Thomas Harrington (adpce.ad) <Thomas.Harrington@adeq.state.ar.us>
Subject: RE: Mercury Minimization Plan

These are just blank survey forms. The progress reports said they were gathering information, my assumption being that they were going to use it in developing an MMP.

To answer Kyle's question, no blank forms aren't sufficient, and yes, they need to develop a "more detailed" MMP, in accordance with Part II.8 of the permit.

Guy Lester, P.E. | Permit Engineer
Division of Environmental Quality | Office of Water Quality
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ARKANSAS
ENERGY & ENVIRONMENT

From: Thomas Harrington (adpce.ad) <Thomas.Harrington@adeq.state.ar.us>
Sent: Thursday, January 18, 2024 11:35 AM
To: Guy Lester (adpce.ad) <Guy.Lester@adeq.state.ar.us>
Subject: FW: Mercury Minimization Plan

I just got this

From: kbreckenridge@saltengineers.com <kbreckenridge@saltengineers.com>
Sent: Thursday, January 18, 2024 11:37 AM
To: Thomas Harrington (adpce.ad) <Thomas.Harrington@adeq.state.ar.us>
Subject: Mercury Minimization Plan

Tom,

Below and attached..is what I sent to Will on November 15th. I thought he had sent the letter and attached surveys.

If this will not suffice then let me know and we'll get with Clinton to get approval to spend some time to develop a more detailed Mercury Minimization Plan.

Thanks,

C. Kyle Breckenridge, P.E., BCEE, PSAP
kbreckenridge@saltengineers.com
cell: 501-766-9832



From: kbreckenridge@saltengineers.com <kbreckenridge@saltengineers.com>
Sent: Wednesday, November 15, 2023 4:06 PM
To: 'Mr. Will Hinchey' <clintonwater9@gmail.com>; 'CLINTON WATER DEPT.' <clintonwater2@gmail.com>
Subject: Mercury Minimization Plan

Will,

I would send these surveys out to all pertinent sewer dischargers in your system, then send a letter to DEQ (Tom Harrington) stating that you have sent out the following surveys to known potential contributors of Mercury within your collection system and attach these surveys as reference. Hopefully, DEQ will accept that as a minimization plan. If they don't, let me know, and we'll get something more detailed drafted for you.

Let me know if you have any questions.

Thanks,

C. Kyle Breckenridge, P.E., BCEE, PSAP
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