



## SAMPLING PLAN AND MAHL STUDY ANALYSIS

At a regular meeting of the City of Hartford Commission, located at 19 West Main Street and called to order by Mayor Jane M. Danger on November 24, 2025

The following resolution was offered:

Moved by Commissioner \_\_\_\_\_ and supported by Commissioner \_\_\_\_\_.

**WHEREAS**, in July 2025, the City Commission approved a proposal from Fleis & VandenBrink (F&V) to complete an update to the City's Industrial Pretreatment Program (IPP) and Local Limits in accordance with 40 CFR 403.5(c); and

**WHEREAS**, a key component of this work is the collection and analysis of representative wastewater samples throughout the City's collection system and wastewater treatment plant (WWTP) to determine pollutant loadings and establish technically defensible local discharge limits; and

**WHEREAS**, F&V has since finalized the **MAHL Sampling Plan – Revision 3** (attached), incorporating EGLE feedback and identifying six (6) sampling locations necessary to complete the Maximum Allowable Headworks Loading (MAHL) study. These locations are as follows:

1. WWTP Influent
2. WWTP Primary Effluent
3. WWTP Final Effluent
4. Background/Domestic (MH1188 – Spaulding Street)
5. AM Hawk Industrial Discharge
6. Mann Metal (MH1003 – potential SIU); and

**WHEREAS**, sampling will be conducted by Trace Analytical Laboratories, Inc. (Trace) in accordance with the attached quotation and methods summary. The scope of work includes:

- Setup and operation of automatic composite samplers;
- Collection of 24-hour flow-proportional composite samples at influent and effluent locations, and time-proportional samples at other locations;
- Analysis for pollutants of concern (POCs) including total metals (Ag, As, Cd, Cr, Cu, Mo, Ni, Pb, Se, Zn), mercury, cyanide, phosphorus, cBOD<sub>5</sub>, TSS, and fats/oils/grease; and
- QA/QC and reporting per EPA and EGLE-approved methods (40 CFR Part 136); and

**WHEREAS**, sampling will occur over four weeks, following the schedule outlined in the F&V Sampling Plan, Rev. 3, and will avoid rainfall events to prevent dilution effects; and

**WHEREAS**, once analytical results are received from Trace, F&V will review, summarize, and incorporate the data into the EPA/EGLE MAHL spreadsheet model to evaluate headworks loadings and determine appropriate local limits for pollutants of concern; and

**WHEREAS**, the total cost for sampling and analysis is \$17,697, as detailed in the attached quote from Trace Analytical Laboratories; and

**NOW THEREFORE, BE IT RESOLVED**, the Commission approves the Sampling Plan – MAHL Study (Revision 3) as authorized, and approves the proposal from Trace Analytical Laboratories, Inc., in the amount of \$17,697 to perform the sampling and analytical services in accordance with the approved plan.

YEAS: Commissioners'

NAYS: ABSENT: Commissioners'

RESOLUTION DECLARED ADOPTED

DATE: November 24, 2025

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RoxAnn Rodney-Isbrecht, City Clerk

I RoxAnn Rodney-Isbrecht, Clerk for the City of Hartford, do hereby certify that the foregoing is a true and complete copy of a Resolution duly adopted by the City Commission of the City of Hartford during a meeting held on November 24, 2025 and the public notice of said meeting was held in compliance with Act 267 of the Public Acts of Michigan of 1976, as amended.

DATE: November 24, 2025

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RoxAnn Rodney-Isbrecht, City Clerk  
City of Hartford  
19 West Main Street  
Hartford MI 49057