



City of Hartford * County of Van Buren * State of Michigan

TO: Mayor Danger and Hartford City Commission

FROM: Quentin Clark, President of Certified Operator Services

CC: Nicol Pulluam, City Manager

DATE: November 24, 2025

RE: **APPROVAL OF SAMPLING PLAN AND MAHL STUDY ANALYSIS**

ITEM BEFORE THE COMMISSION:

The item before the Commission to approve the Sampling Plan – MAHL Study (Revision 3) as authorized, and the acceptance of the proposal from Trace Analytical Laboratories, Inc., for \$17,697 to perform the sampling and analytical services in accordance with the approved plan.

BACKGROUND:

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). 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.

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)

DISCUSSION:

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, cBOD₅, TSS, and fats/oils/grease; and
- QA/QC and reporting per EPA and EGLE-approved methods (40 CFR Part 136).

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

RECOMMENDATION:

The item before the Commission to approve the Sampling Plan – MAHL Study (Revision 3) as authorized, and the acceptance of the proposal from Trace Analytical Laboratories, Inc., for \$17,697 to perform the sampling and analytical services in accordance with the approved plan.

Attachments

1. Fleis & VandenBrink – *Hartford WWTP MAHL Sampling Plan Rev. 3* (dated November 11, 2025)
2. Trace Analytical Laboratories – *MAHL Study 2025 Breakdown and Summary with Methods*
3. Fleis & VandenBrink – *IPP/Local Limits Update Proposal* (Approved July 2025)