

April 9, 2012

Mr. Isaac Keeling Water and Sewer Manager City of Clinton PO Box 277 Clinton, AR 72031

Re: AFIN: No. 71-00018, NPDES Permit No. AR0048836

Dear Mr. Keeling:

On February 21 and 22, 2012, I performed a Compliance Sampling Inspection of the waste water treatment facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection did not reveal evidence of any violations.

If I can be of any assistance, please contact me at (870) 446-6170 or by e-mail at Kirkpatrick@adeq.state.ar.us.

Sincerely,

Buce Helpihet

Bruce Kirkpatrick District 2 Field Inspector Water Division

cc: Water Division Enforcement Branch Water Division Permits Branch

€	PA	Form Approved OMB No. 2040-0003						
	U							
	NPDES							
			Section A: Nationa		—			
Transaction Code NPDES 1 N 2 5 3 A R 0 0 4 8 8 3				12 1	Yr/Mo/Day 2 0 2 2 17	Inspec. TypeInspectorFac. Type18S19S201		
	A F I N 7 1 - 0 0 1 8 Remarks Inspection Work Days Facility Evaluation Rating BI QA					Reserved		
	07	10 5	71					
Section B: Facility Data Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Entry Time/Date City of Clinton 1035 hrs / 2-21-2012 0802 hrs / 2-22-2012						Permit Effective Date December 1, 2010		
	Wastewater Treatment Plant on 23, Township 11 North, Range 1	14 West in Van Buren	County, AR		Exit Time/Date 1351 hrs / 2-21-2012 0903 hrs / 2-22-2012	Permit Expiration Date November 30, 2015		
Mr. Kevin Donahue / Plant Operator / ph 501-745-4320 / fax 501-745-2164						Other Facility Data PDS #064952		
Name, Address of Responsible Official/Title/Phone and Fax Number Image: Contacted Mr. Isaac Keeling, Water and Sewer Manager Contacted PO Box 277 Clinton, AR 72031 / same as above Yes No Image: No								
			etion C: Areas Eva rv, M = Marginal, U		uring Inspection (sfactory, N = Not Evaluated)			
S	Permit	S Flow Measureme		C	erations & Maintenance	S Sampling		
S	Records/Reports			N Pollution Prevention				
S		N Compliance Sche	dules		etreatment	N Multimedia		
S	Effluent/Receiving Waters	S Laboratory	N Storm Water N			other:		
A Compliance Sampling Inspection was performed on 2-21-2012 and 2-22-2012. Samples were taken at Outfall 001 by the ADEQ Inspector and analyzed at the ADEQ Laboratory and in field by ADEQ Inspector. Results revealed that the facility was producing a high quality effluent well within the permitted pollutant limits. The inspection revealed that the facility was incompliance with the terms of its permit.								
Nar	Name(s) and Signature(s) of Inspector(s) Bruce Kirkpatrick Agency/Office/Telephone/Fax Date							
Ruce Repeired AR Dept. of Environmental Quality-Jas PHONE# (870) 446-6170 / FAX# (870) 4						April 5, 2012		
Agency/Office/Phone and Fax Numbers								
Signature of Reviewer Date						Date		

ADEQ Water NPDES Inspection

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	Øs 🗆 m 🗇 u 🗆 na 🗠 ne
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	DY DN ØNA DNE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	ØS 🗆 🖓 🗇 🖓 NA 🗇 NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs 🗆m 🗇u 🖾na 🖾ne
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	□s □m □u □na Øne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	Øs 🗆m 🗇u 🖾na 🖾ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	Øs 🗆m 🗇u 🖾na 🖾ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	Øs 🗆m 🗇u 🖾na 🖾ne
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	Øs 🗆m 🗇u 🖾na 🖾ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	🗹 S 🗆 M 🗇 U 🗆 NA 🖾 NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs 🗆m 🗇u 🖾na 🖾ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	Øs 🗆m 🗇u 🖾na 🖾ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	Øs 🗆m 🗇u 🖾na 🖾ne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: Slight overflow of pond levee. No discharge to state waters.	

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	Øs □m □u □na □ne
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	
a. SAMPLES REFRIGERATED DURING COMPOSITING:	🗹 y 🗆 n 🗆 na 🗆 ne
b. PROPER PRESERVATION TECHNIQUES USED:	
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	🗹 y 🗆 n 🗆 na 🗆 ne
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	DY DN ØNA DNE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 6 inch Parsh	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	
4. CALIBRATION FREQUENCY ADEQUATE:	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	
9. HEAD MEASURED AT PROPER LOCATION:	
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	ØS OM OU ONA ONE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	
4. QUALITY CONTROL PROCEDURES ADEQUATE:	
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED <u>></u> 10% OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME: Environmental Services	
b. LAB ADDRESS: 13715 West Markham, Little Rock, AR 72211	
c. PARAMETERS PERFORMED: CBOD, TSS, DO,NH3-N,FECAL COLIFORM, NO2+N03, Ph, Biomonitoring, Ecoli	
8. BIOMONITORING PROCEDURES ADEQUATE:	
a. PROPER ORGANISMS USED:	
b. PROPER DILUTION SERIES FOLLOWED:	
c. PROPER TEST METHODS AND DURATION:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	

ADEQ Water NPDES Inspection

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS											
BASED ON VISUAL OBSERVATIONS ONLY							ØS 🗆 🖾 🗆 🗆 🗆 🖾 🗆 🗠				
DETAILS:											
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER				
001	none	none	none	slight	none	clear					
SECTION H: SLUDGE DISPOSAL											
SLUDGE D	DISPOSAL MEE	ETS PERMIT F	REQUIREMEN	ГS		Øs 🗆 M 🗖					
DETAILS:					•						
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s ⊡m					
2. SLUDGE R	ECORDS MAINTAINED	DAS REQUIRED BY 40) CFR 503:			⊠s ⊡m					
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):						
SECTION	I: SAMPLIN	G INSPECTIO	ON PROCEDU	JRES							
SAMPLE R	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S		Øs 🗆 M 🗖					
DETAILS:											
1. SAMPLES	OBTAINED THIS INSPE	ECTION:				₽Y					
2. TYPE OF S											
3. SAMPLES PRESERVED:											
4. FLOW PROPORTIONED SAMPLES OBTAINED:											
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:											
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			₽Y					
7. SAMPLE SI	PLIT WITH PERMITTE	E:				ΠY	⊠n ⊡na ⊡ne				
8. CHAIN-OF-	CUSTODY PROCEDUI		₽Y	🗆 n 🗆 na 🗆 ne							
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:											
SECTION	J: STORM V	VATER POLL	UTION PREV	/ENTION PL/	AN						
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	5		U 🗹 NA 🗆 NE				
DETAILS:											
1. SWPPP UP	DATED AS NEEDED:	DATE OF LAST UP	DATE:			ΠY	⊡n Øna ⊡ne				
2. SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:			ΠY	🗆 n 🗹 na 🗆 ne				
3. POLLUTION	N PREVENTION TEAM	IDENTIFIED:				ΠY	🗆 n 🗹 na 🗆 ne				
4. POLLUTION	N PREVENTION TEAM	PROPERLY TRAINED):			ΠY	□n Øna □ne				
5. LIST OF PC	DTENTIAL POLLUTANT	SOURCES:				ΠY	□n Øna □ne				
6. LIST OF PC	DTENTIAL SOURCES A	AND PAST SPILLS AND	D LEAKS:			ΠY					
7. ALL NON-S	TORM WATER DISCH	ARGES ARE AUTHOR	IZED:								
8. LIST OF ST	RUCTURAL BMPS:						🗆 n 🗹 na 🗆 ne				
9. LIST OF NO	ON-STRUCTURAL BMF	PS:				ΠY	□n Øna □ne				
10. BMPS PRO	PERLY OPERATED A	ND MAINTAINED:				ΠY					
11. INSPECTIC	INS CONDUCTED AS I	REQUIRED:				ΠY	□n Øna □ne				

ADEQ Water NPDES Inspection

AFIN: 71-00018

		FLOW CA	LCULA	ATION S	SHEET			
	/ / -		•					
Date:	2-21-2012	Time: 110						
Head in Inches: 10.5 Feet: .875								
Type &	Size of Primary F	low Measurem	nent De	vice: 6'	' Parsha	ll flume		
Name & Model of Secondary Flow Measurement Device: BIF Chart Recorder								
		•			Po	olysonic	s MSP 90	
Date of	last Calibration o	f Secondary Fl	ow Dev	/ice: 2- 1	12-12			
Record	ed Flow at Date &	& Time Listed A	bove:	1.04 n	ngd	(F	Facility Flow Meter)	
	ted Flow at Date				8 mgd	th		
(Flow is ca	Iculated using flow char	ts in: <u>ISCO Open Ch</u>	nannel Flo	w Measure	ement Hand	book-5"' Edi	tion)	
% Error	· _	Recorded Value - Calculated Value Calculated Value Calculated Value Calculated Value						
% Error	· _ 1.04	-	1.078		X 100			
		1.078						
% Error		X 100						
/0 21101								
% Error	. =	X 100						
% Error	-3.5	%						
		70						
Comme	ents: 0k, < 10%							

LAB RESULTS

Arkansas Department of Environmental Quality Laboratory Contact: Client: CSI Client Sample ID: Clinton Outfall 001 Lab ID: 2012-0527 Collection Date: 2/22/2012 8:03:00 AM Matrix: Water Analyses Total Suspended Solids EPA 160.2 Batch: 12022401 Run: 1 **Result Reporting** Limit **MDL Qual Unit** Analysis Date/Time 2/22/2012 7:30 Total Kjeldahl Nitrogen SM 4500-N C Batch: 12022407 Run: 1 **Result Reporting** Limit **MDL Qual Unit** Total Kjeldahl Nitrogen 1.05 0.05 0.05 mg/L **Dilution Factor 1.0** Analyzed By Chad Carrington Analysis Date/Time 2/23/2012 11:15:31 AM Total Phosphorus SM 4500-P J Batch: 12022406 Run: 1 **Result Reporting** Limit **MDL Qual Unit** Phosphorus-total 0.473 0.01 0.01 mg/L Dilution Factor 1.0 Analyzed By Chad Carrington Analysis Date/Time 2/23/2012 11:15:31 AM Page 3 of 14 501-682-0955 Ruehr@adeq.state.ar.us Jeff Ruehr North Liitle Rock, AR 72118 5301 Northshore Drive Arkansas Department of Environmental Quality Laboratory Contact: Client: CSI Client Sample ID: Clinton Outfall 001 Lab ID: 2012-0527 Collection Date: 2/22/2012 8:03:00 AM Matrix: Water Analyses E.Coli by MF EPA 1103.1 Batch: 12022304 Run: 1 **Result Reporting** Limit **MDL Qual Unit** E. Coli 104 4 1 cfu/100ml Analyzed By Alan Price Analysis Date/Time 2/22/2012 13:30 Fecal Coliforms SM 9222 D Batch: 12022302 Run: 1 **Result Reporting** Limit **MDL Qual Unit** Fecal Coliforms 300 4 4 cfu/100ml Analyzed By Alan Price Analysis Date/Time 2/22/2012 13:30 Page 4 of 14 501-682-0955 Ruehr@adeq.state.ar.us

Jeff Ruehr North Liitle Rock, AR 72118 5301 Northshore Drive Arkansas Department of Environmental Quality Laboratory Contact: Client: CSI Client Sample ID: Clinton Outfall 001 Lab ID: 2012-0527 Collection Date: 2/22/2012 8:03:00 AM Matrix: Water

Analyses

Field Data Batch: 12030203 Run: 1 Result Reporting

Limit

MDL Qual Unit Dissolved Oxygen 10.2 mg/L pH NA SU Temperature 9.5 C Analyzed By Bruce Kirkpatrick Analysis Date/Time 2/22/2012 08:03



Re-aeration cascade

ADEQ Water NPDES Inspection

AFIN: 71-00018

Permit #: AR0048836



Sampling location for Outfall 001 at base of cascade