



A R K A N S A S
Department of Environmental Quality

November 5, 2015

Isaac Keeling, Water and Sewer Manager
City of Clinton
P.O. Box 277
Clinton, AR 72031

RE: Clinton East Treatment Plant SSO/Collection System Inspection (Van Buren Co)
AFIN: 71-00018 NPDES Permit No.: AR0048836

Dear Mr. Keeling:

On May 21, 2014, I performed a Reconnaissance Inspection of the above-referenced 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. A copy of the inspection report is enclosed for your records.


No violations were noted at the time of the inspection. Please refer to the attached inspection report for any comments.

The alleged disposal of medical solid waste into the collection system has been referred to the Arkansas Department of Health (ADH). Please review the "General Comments" section for additional info.

If I can be of any assistance, please contact me by e-mail at morris@adeq.state.ar.us or by phone at (501) 837-6978.

Sincerely,

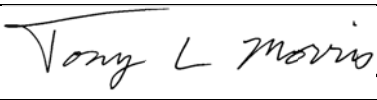
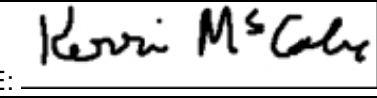
Tony L. Morris
District 2 Field Inspector
Water Division

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|--|---|--|--------------------------|----------|-------------------------|
|  A R K A N S A S Department of Environmental Quality | WATER DIVISION INSPECTION REPORT | | | | |
| | AFIN: 71-00018 | PERMIT #: AR0048836 | DATE: 10/20/2015 | | |
| | COUNTY: 71 Van Buren | PDS #: 087579 | MEDIA: WN | | |
| GPS LAT: 35.5806 LONG: -92.4852 LOCATION: General Area | | | | | |
| FACILITY INFORMATION | | INSPECTION INFORMATION | | | |
| NAME: Clinton East Treatment Plant LOCATION: 601 Pond Street CITY: Clinton, AR | | FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 26588 S - State FACILITY EVALUATION RATING: N INSPECTION TYPE: Reconnaissance | | | |
| RESPONSIBLE OFFICIAL | | DATE(S): 10/20/2015 ENTRY TIME: 09:00 EXIT TIME: 10:40 PERMIT EFFECTIVE DATE: 12/1/2010 PERMIT EXPIRATION DATE: 11/30/2015 | | | |
| NAME / TITLE: Isaac Keeling / Water and Sewer Manager COMPANY: City of Clinton MAILING ADDRESS: P.O. Box 277 CITY, STATE, ZIP: Clinton AR 72031 PHONE & EXT. / FAX: 501-253-5780 / EMAIL: clintonwater2@gmail.com | | FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N | | | |
| CONTACTED DURING INSPECTION: Yes | | INSPECTION PARTICIPANTS | | | |
| | | NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Isaac Keeling, Water and Sewer Manager 501-253-5780 | | | |
| AREA EVALUATIONS | | | | | |
| (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated) | | | | | |
| N | PERMIT | N | FLOW MEASUREMENT | N | STORMWATER |
| N | RECORDS/REPORTS | N | LABORATORY | S | FACILITY SITE REVIEW |
| S | OPERATION & MAINTENANCE | N | EFFLUENT/RECEIVING WATER | S | SELF-MONITORING PROGRAM |
| N | SAMPLING | N | SLUDGE HANDLING/DISPOSAL | N | PRETREATMENT |
| S | OTHER: SSO | | | | |
| SUMMARY OF FINDINGS | | | | | |
| No permit violations were noted. | | | | | |

GENERAL COMMENTS

The SSO Inspection was in response to an overflow from a manhole, which occurred on 10/15/2015. The collection line serves the Van Buren Co Memorial Hospital, the Ozark Health Nursing Center, and one other medical-related facility. The overflow was observed by a passing citizen and reported to the Clinton Water and Sewer Department. A crew was immediately mobilized and began working to unstop the plugged line. After considerable effort, approximately four, 30-gal trash bags of debris were removed from the line. Included in the debris was what appeared to be regulated medical waste including: possibly blood-stained cotton and gauze bandaging. Debris from the blockage was placed in 30-gal plastic bags and transported to the Sewer Department's utility shop while the area around the manhole and overflow was treated with lime to kill potential pathogens. An overflow report was submitted to the ADEQ Water Division Enforcement Branch.

Although no violations of the permit were noted, I urge you to take steps to prevent this type of occurrence in the future. Based upon our conversation, there are three medical-related businesses served by the sewer line, two of which are under the same management. The volume of waste removed from the sewer line indicates a deliberate act of vandalism or the possible illegal disposal of medical waste. In either case, the hospital management is responsible for ensuring that inappropriate types of waste are not disposed in the city sewer. I urge you to discuss the issue with the hospital management. They should be aware that disposal of inappropriate types of waste in the sewer causes unnecessary expense to the city and puts Sewer Department employees at risk. The ADH regulates medical waste through Rules and Regulations pertaining to the Management of Medical Waste from Generators and Health Care Related Facilities. Incidents involving the release of medical waste to the environment should be reported verbally as soon as possible but within 12 hours of the incident. Verbal reports can be made to the attention of Carrie Poston at 501-661-2621 and should be followed up within 5 days with a written report on the form provided in the Rules and Regulations document, which is available on the ADH website.

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| INSPECTOR'S SIGNATURE: |  Tony L. Morris | DATE: 10/22/2015 |
| SUPERVISOR'S SIGNATURE: |  Kerri McCabe | DATE: 11/5/2015 |

Water Division Photographic Evidence Sheet

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|---------------|--|----------|-------------------|
| Location: | Clinton East Treatment Plant, SSO | | |
| Photographer: | Tony Morris | Date: | 10/20/2015 |
| Witness: | Isaac Keeling | Time: | 10:06 |
| | | Photo #: | 1 |
| Description: | The manhole which overflowed with the hospital in background. | | |



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|---------------|---|----------|-------------------|
| Photographer: | Tony Morris | Date: | 10/20/2015 |
| Witness: | Isaac Keeling | Time: | 09:45 |
| | | Photo #: | 2 |
| Description: | Debris which caused sewer blockage consisting of cloth, gauze, and cotton. | | |



Water Division Photographic Evidence Sheet

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|---------------|--|----------|-------------------|
| Location: | Clinton East Treatment Plant, SSO | | |
| Photographer: | Tony Morris | Date: | 10/20/2015 |
| Witness: | Isaac Keeling | Time: | 09:54 |
| | | Photo #: | 3 |
| Description: | Wipes and gauze bandaging removed from the material causing the blockage. | | |



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|---------------|--|----------|-------------------|
| Photographer: | Tony Morris | Date: | 10/20/2015 |
| Witness: | Isaac Keeling | Time: | 09:54 |
| | | Photo #: | 4 |
| Description: | Cotton roll isolated from the mass of material blocking the sewer line. | | |

