

ADEQ

ARKANSAS
Department of Environmental Quality

September 13, 2017

Richard McCormac, Mayor
City of Clinton - Clinton Water & Sewer
PO Box 277
Clinton, AR 72031

RE: City of Clinton - East Plant Inspections (Van Buren Co)

AFIN: 71-00018

Permit No.: AR0048836

ARR000060

5130-W

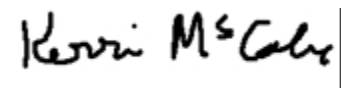
Dear Mayor McCormac:

On June 20, 2017, I performed a Compliance Evaluation Inspection, an SSO/Collection System Inspection, an Industrial Stormwater Inspection, and a State No-Discharge 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. Copies of the inspection reports are enclosed for your records.

Please refer to the "Summary of Findings" section of each of the attached inspection reports and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e., photos) is due by **September 28, 2017**.

If I can be of any assistance, please contact me at mccabe@adeq.state.ar.us or (501) 682-0642.

Sincerely,



Kerri McCabe
Inspector Supervisor
Office of Water Quality



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

WATER DIVISION INSPECTION REPORT

AFIN: 71-00018	PERMIT #: AR0048836	DATE: 6/20/2017
COUNTY: 71 Van Buren	PDS #: 099059	MEDIA: WN
GPS LAT: 35.582234 LONG: -92.447319 LOCATION: Entrance		

FACILITY INFORMATION	INSPECTION INFORMATION								
NAME: City of Clinton - East Plant LOCATION: at the end of Pond Rd CITY: Clinton, AR	FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 84022 S - State FACILITY EVALUATION RATING: 2 - Marginal INSPECTION TYPE: Compliance Evaluation								
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">DATE(S): 6/20/2017</td> <td style="width: 25%;">ENTRY TIME: 10:15</td> <td style="width: 25%;">EXIT TIME: 12:30</td> <td style="width: 25%;">PERMIT EFFECTIVE DATE: 12/1/2010</td> </tr> <tr> <td>9/6/2016</td> <td>08:00</td> <td>12:30</td> <td>PERMIT EXPIRATION DATE: 12/30/2015</td> </tr> </table>	DATE(S): 6/20/2017	ENTRY TIME: 10:15	EXIT TIME: 12:30	PERMIT EFFECTIVE DATE: 12/1/2010	9/6/2016	08:00	12:30	PERMIT EXPIRATION DATE: 12/30/2015
DATE(S): 6/20/2017	ENTRY TIME: 10:15	EXIT TIME: 12:30	PERMIT EFFECTIVE DATE: 12/1/2010						
9/6/2016	08:00	12:30	PERMIT EXPIRATION DATE: 12/30/2015						
RESPONSIBLE OFFICIAL									
NAME / TITLE: Richard McCormac / Mayor COMPANY: City of Clinton - Clinton Water & Sewer MAILING ADDRESS: PO Box 277 CITY, STATE, ZIP: Clinton AR 72031 PHONE & EXT. / FAX: 501-745-8110 / 501-745-6464 EMAIL: clintonmayor@artelco.com	FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N								
CONTACTED DURING INSPECTION: Yes	INSPECTION PARTICIPANTS								
	NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Phil Graham (Lic #008981)/WW Operator (Class III/Basic Industrial)/(501) 253-1365/clintonfire25@yahoo.com Richard Hink/Water & Sewer Manager/(501) 253-2904/clintonwater2@gmail.com District 2 Inspector Skyler Schlick District 2 Inspector LeeVi Haas								

AREA EVALUATIONS

(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)

S	PERMIT	M	FLOW MEASUREMENT	S	STORMWATER
S	RECORDS/REPORTS	S	LABORATORY	S	FACILITY SITE REVIEW
M	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM
S	SAMPLING	S	SLUDGE HANDLING/DISPOSAL	N	PRETREATMENT
**	OTHER:				

SUMMARY OF FINDINGS

The following violations were noted during the inspection:

- 1.) The treatment system is not meeting the percent removal for TSS. A 2016 influent sample for BOD5 and TSS resulted in a 98% removal for BOD5 and a 72% removal for TSS. This is a violation of Part II, Condition #2 of the permit. The operator needs to evaluate the treatment process to determine the causes for the lack of TSS removal, which may be resulting from inorganic load instead of organic load.
- 2.) The secondary flowmeter has not been calibrated since Jan 2014 and is reporting over compared to the primary device. Additionally, the staff gauge should be cleaned periodically in order to conduct an accurate instantaneous reading from the Parshall flume. This is a violation of Part III, Section C, 2 of the permit.

Note: The plant was originally inspected Sept 6, 2016. With the exception of the items noted above, all items identified during the original inspection have been addressed and will not be cited as violations.

GENERAL COMMENTS

On Tue, June 20, 2017 an inspection was conducted of the City of Clinton East Plant with the above-mentioned inspection participants. The inspection consisted of a site assessment and a records review (conducted on June 21, 2017).

Site assessment:

Treatment is achieved via complete process (activated sludge) or partial process (irrigation). The partial process consists of automatic bar screen at the headworks, collection into wet well, routed to a primary lagoon, routed to secondary lagoon (aerated with four aerators), chlorine disinfection, and pumped to irrigation fields for land application (5130-W). The complete process pulls from the primary pond (after preliminary) into a collection trough for chemical addition (pH and alkalinity adjustments) prior to being routed to the two-cell continuous flow stirred reactors (CFSTR; ran parallel) for traditional activated sludge, thence to the secondary clarifier, thence to the rapid sand filter, thence to UV disinfection, primary/secondary flowmeters, thence to post-aeration, thence discharge from Outfall 001. The mechanical portion of the plant discharges about three times per year (Jan-March; varies based on precipitation) with the bulk of the wastewater routed to the irrigation fields. Wasted sludge and leftover effluent from the clarifier are routed to the secondary lagoon; and currently, there is no need for sludge removal from the lagoons. Floatables and other trash collected from the bar screen are sent to the Van Buren Co transfer station (0095-STSW-B) prior to disposal at the City of Morrilton landfill (0257-S1-R1).

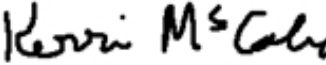

During the Sept 6, 2016 inspection, there were numerous O&M issues associated with the plant; however, prior to the June 20, 2017 inspection, the majority of the issues have been resolved. The waste valve is still being manually controlled; however, the part had been ordered prior to the most current inspection. Also, one automatic sampler is not operational and has been sent out for repairs. Overall, the plant is being operated and maintained properly with only minor concerns associated with stormwater. These issues will be addressed in the separate IGP inspection report.

The city maintains an in-house lab at the treatment plant; however, the equipment is outdated and/or not operational. Although the city currently uses a contract lab for all sample collection/analyses during discharge, they may want to consider, at a minimum, DO and pH meters for the instantaneous parameters. The city should implement a cost analyst to determine if it is cost effective to purchase the meters and any required standards, buffers, etc. verses having the contract lab continue sampling/analyzing the instantaneous parameters. Additionally, utilizing meters onsite by the operator requires maintaining documentation of calibration and analysis results.

Records review:

Records for flow through plant, flow irrigated, and chemical addition are kept at the plant, and records from the contract lab are kept at the water department office. In 2016, the records were complete but disorganized. For 2017, record upkeep has been improved. Office personnel should separate records for each NPDES permit.

No issues were noted for COCs or lab analysis sheets. The contract lab is conducting a 24-hr composite for all parameters. Only WET testing requires a 24-hr composite and other parameters can be collected per the definition of "composite" in Part IV of the permit.

INSPECTOR'S SIGNATURE: 	Kerri McCabe	DATE: 9/5/2017
SUPERVISOR'S SIGNATURE: 	Jason Bolenbaugh	DATE: 9/12/2017

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: The permit has been administratively extended with an expiration date of Nov 30, 2015; TMDL for Mercury.	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ALL DISCHARGES ARE PERMITTED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: Contract lab conducts all sampling for NPDES permit and State No-Discharge permit.	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
a. DATES AND TIME(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. EXACT LOCATION(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. ANALYTICAL METHODS AND TECHNIQUES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
e. RESULTS OF CALIBRATIONS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
f. RESULTS OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
g. DATES AND TIMES OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: Plant is designed for complete treatment as well as irrigation of partially treated wastewater. Complete treatment is via traditional activated sludge and partial treatment for irrigation is via lagoon system (5130-W).	
1. TREATMENT UNITS PROPERLY OPERATED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
2. TREATMENT UNITS PROPERLY MAINTAINED: Waste valve for rapid sand filter had been ordered prior to the inspection, but has not been received/installed.	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: Mechanical plant only discharges 3 months/year; permit renewal application is reporting two 200kw generators.	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: Starts in lagoon system; manually routed to mechanical plant.	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: One Class III/Basic Industrial	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: Can route from clarifier to Secondary Lagoon; retain in lagoon system.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: Contract lab conducts all sampling for NPDES permit and State No-Discharge permit.	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT: Contract lab is conducting a 24-hr composite for all parameters requiring a composite; operator/lab should review definition of "composite" in Part IV of the permit.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: Observations regarding flow were made during Sept 6, 2016 discharge.	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: <u>Yes</u> TYPE OF DEVICE: <u>6" Parshall flume with staff gauge</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: <u>HydroRanger 200 (totalizer)</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE: <u>Last calibrated Jan 14, 2014; will need to be calibrated prior to Jan 2018 discharge.</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE: <u>Accuracy check conducted Sept 6, 2016.</u>	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: Contract lab conducts all sampling for NPDES permit and State No-Discharge permit.	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. COMMERCIAL LABORATORY USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. LAB NAME: <u>Environmental Services Co, Inc. (ESC)</u>	
b. LAB ADDRESS: <u>13715 W Markham, Little Rock, AR 7221</u>	
c. PARAMETERS PERFORMED: <u>CBOD5, TSS, NH3-N, DO, FCB, E. coli, TP, NO3+NO2-N, pH, and WET</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS							
BASED ON VISUAL OBSERVATIONS ONLY						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <u>Observation from Sept 6, 2016 inspection. No discharge during June 20, 2017 inspection; partially treated wastewater was being used for irrigation.</u>							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	6/20/2017
001	NO	NO	NO	NO	NO	CLEAR	9/6/2016
SECTION H: SLUDGE DISPOSAL							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <u>Sludge from clarifier is routed back to lagoon system; sludge depth in lagoons has not been measured.</u>							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE): <u>N/A</u>							
SECTION I: SAMPLING INSPECTION PROCEDURES							
SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SAMPLES OBTAINED THIS INSPECTION:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:___ <input type="checkbox"/> COMPOSITE:___ METHOD:___ FREQUENCY:___							
3. SAMPLES PRESERVED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. FLOW PROPORTIONED SAMPLES OBTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. SAMPLE SPLIT WITH PERMITTEE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
SECTION J: STORM WATER POLLUTION PREVENTION PLAN							
STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <u>Part II, Condition #6 requires BMPs for stormwater protection; inspected under IGP ARR000060 (see separate report for details).</u>							
1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE:___						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
3. POLLUTION PREVENTION TEAM IDENTIFIED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. LIST OF POTENTIAL POLLUTANT SOURCES:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. LIST OF STRUCTURAL BMPS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. LIST OF NON-STRUCTURAL BMPS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
10. BMPS PROPERLY OPERATED AND MAINTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
11. INSPECTIONS CONDUCTED AS REQUIRED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	

FLOW CALCULATION SHEET

Date: **Sept 6, 2016** Time: **0848**

Head in Inches: Feet: **0.5'**

Type & Size of Primary Flow Measurement Device: **6" Parshall flume**

Name & Model of Secondary Flow Measurement Device: **HydroRanger 200 (totalizer)**

Date of last Calibration of Secondary Flow Device: **Jan 14, 2014**

Recorded Flow at Date & Time Listed Above: **0.65 MGD** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **0.4453 MGD**

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

% Error =	Recorded Value	-	Calculated Value	X 100	
	Calculated Value				

% Error =	0.65	-	0.4453	X 100	
	0.4453				

% Error =	0.2047	X 100	
	0.4453		

% Error =	0.4597	X 100	
-----------	--------	-------	--

% Error =	46	%	
-----------	-----------	---	--

Comments: **Out of range and reporting over; totalizer needs to be calibrated prior to discharge in Jan 2018 and staff gauge needs to be cleaned; operator should consider accuracy checks during discharge months.**

DMR Calculation Check

Reporting Period: From 2017 03 01 To 2017 03 31
 Year Month Day Year Month Day

Parameter Checked: CBOD5 (Dec-April)

	Loading Mass (lbs/day) Mo. Avg.	Concentration (mg/l)	
		Mo. Avg.	7-Day Avg.
Reported Value:	<u>17.9</u>	<u>2.6</u>	<u>6</u>
Calculated Value:	<u>20.3</u>	<u>2.3</u>	<u>3</u>
Permit Value:	<u>200.2</u>	<u>20</u>	<u>30</u>

If calculated value does not equal reported value, explain:
Values are not the same, but are comparable; used flow measured during sample collection (comparable to Daily Flow recorded by operator); see Figure 2 for calculations. City may need to contact contract lab and determine how values are being generated, but it appears that a sample from March 1 was used even though the operator's flow sheet is reporting "No discharge" for that date and the contract lab's COC noted "no power at plant."

DMR Calculation Check

Reporting Period: From 2017 03 01 To 2017 03 31
 Year Month Day Year Month Day

Parameter Checked: NH3-N (Dec - March)

	Loading Mass (lbs/day) Mo. Avg.	Concentration (mg/l) Mo. Avg.	7-Day Avg.
	Reported Value:	<u>2.0</u>	<u>0.31</u>
Calculated Value:	<u>2.4</u>	<u>0.24</u>	<u>0.46</u>
Permit Value:	<u>63.1</u>	<u>6.3</u>	<u>9.5</u>

If calculated value does not equal reported value, explain:
Values are not the same, but are comparable; used flow measured during sample collection (comparable to Daily Flow recorded by operator); see Figure 3 for calculations. City may need to contact contract lab and determine how values are being generated, but it appears that a sample from March 1 was used even though the operator's flow sheet is reporting "No discharge" for that date and the contract lab's COC noted "no power at plant."

Water Division Photographic Evidence Sheet

Location:	City of Clinton - East Plant			
Photographer:	Kerri McCabe	Date:	June 20, 2017	
Witness:	LeeVi Haas, Skyler Schlick	Time:	1021	
Description:	Preliminary at headworks (bar screen and auger).		Photo #:	1



Photographer:	Kerri McCabe	Date:	June 20, 2017	
Witness:	LeeVi Haas, Skyler Schlick	Time:	1022	
Description:	Preliminary at headworks (bar screen and auger); petro-based leak noted.		Photo #:	2



Water Division Photographic Evidence Sheet

Location:	City of Clinton - East Plant			
Photographer:	Kerri McCabe	Date:	June 20, 2017	
Witness:	LeeVi Haas, Skyler Schlick	Time:	1023	
Description:	Collection trough for influent; route by gravity to two-stage lagoon.		Photo #:	3



Photographer:	Kerri McCabe	Date:	June 20, 2017	
Witness:	LeeVi Haas, Skyler Schlick	Time:	1022	
Description:	Collection trough for influent; route by gravity to two-stage lagoon.		Photo #:	4



Water Division Photographic Evidence Sheet

Location:	City of Clinton - East Plant		
Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1024
		Photo #:	5
Description:	Primary pond for two-stage lagoon system.		



Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1026
		Photo #:	6
Description:	Secondary/storage pond for two-stage lagoon system; aerated.		



Water Division Photographic Evidence Sheet

Location:	City of Clinton - East Plant		
Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1028
		Photo #:	7
Description:	Previously used to accept septic tank hauler waste; location has been moved.		



Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1025
		Photo #:	8
Description:	Chlorine disinfection for irrigation water from storage lagoon.		



Water Division Photographic Evidence Sheet

Location:	City of Clinton - East Plant		
Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1025
		Photo #:	9
Description:	Irrigation pumps to route effluent from the storage lagoon to the irrigation fields.		



Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1211
		Photo #:	10
Description:	Irrigation fields for effluent from storage lagoon.		



Water Division Photographic Evidence Sheet

Location:	City of Clinton - East Plant		
Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1023
Description:	Pump house for routing influent from collection trough to CFSTR.		



Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1026
Description:	Chemical feed storage for activated sludge plant; alkalinity and pH adjustments.		



Water Division Photographic Evidence Sheet

Location:	City of Clinton - East Plant		
Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1035
		Photo #:	13
Description:	East Basin of CFSTR; solids routed to storage lagoon.		



Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1035
		Photo #:	14
Description:	West Basin for CFSTR; solids routed to storage lagoon.		



Water Division Photographic Evidence Sheet

Location:	City of Clinton - East Plant		
Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1041
		Photo #:	15
Description:	Secondary clarifier with skimmer arm; effluent routed back to storage lagoon.		



Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1041
		Photo #:	16
Description:	Secondary clarifier weir; effluent routed back to storage lagoon.		



Water Division Photographic Evidence Sheet

Location:	City of Clinton - East Plant			
Photographer:	Kerri McCabe	Date:	June 20, 2017	
Witness:	LeeVi Haas, Skyler Schlick	Time:	1045	
Description:	Rapid sand filter for polishing clarified effluent.		Photo #:	17



Photographer:	Skyler Schlick	Date:	June 20, 2017	
Witness:	LeeVi Haas, Kerri McCabe	Time:	1046	
Description:	Rapid sand filter for polishing clarified effluent.		Photo #:	18



Water Division Photographic Evidence Sheet

Location:	City of Clinton - East Plant		
Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1048
Description:	Pump house for RAS/WAS and effluent discharge to Outfall 001.		



Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1052
Description:	UV disinfection unit and primary/secondary flowmeters.		



Water Division Photographic Evidence Sheet

Location:	City of Clinton - East Plant		
Photographer:	Kerri McCabe	Date:	June 20, 2017
Witness:	LeeVi Haas, Skyler Schlick	Time:	1100
		Photo #:	21
Description:	Post-aeration at Outfall 001; automatic sampler collects at bottom of stairs.		



Figure 1. Google Earth image dated Oct 16, 2014 depicting City of Clinton (East Plant) with major components labeled.



Figure 2. DMR calculations for City of Clinton (East Plant) March 2017 CBOD5.

BOD5 - Clinton (East)				
Mar-17				
Date	Concentration (mg/l)	7-day Average (mg/l)	Daily Flow (MGD)	Mass (lbs/day)
6	2	2	0.7	11.676
8	2		1.11	18.5148
9	2		1.71	28.5228
13	2	2	1.14	19.0152
14	2		1.11	18.5148
16	2		1.13	18.8484
20	2	2.333333333	1.16	19.3488
22	3		1.16	29.0232
23	2		1.13	18.8484
27	5	3	0.6	25.02
29	2		1.1	18.348
30	2		1.1	18.348
MAX	5		MAX	29.0232
MIN	2		MIN	11.676
Average	2.333333333		Average	20.3357

Figure 3. DMR calculations for City of Clinton (East Plant) March 2017 NH3-N.

NH3-N - Clinton (East)				
Mar-17				
Date	Concentration (mg/l)	7-day Average (mg/l)	Daily Flow (MGD)	Mass (lbs/day)
6	0.16	0.2533333333	0.7	0.93408
8	0.11		1.11	1.018314
9	0.49		1.71	6.988086
13	0.14	0.456666667	1.14	1.331064
14	0.45		1.11	4.16583
16	0.78		1.13	7.350876
20	0.05	0.1333333333	1.16	0.48372
22	0.15		1.16	1.45116
23	0.2		1.13	1.88484
27	0.18	0.13	0.6	0.90072
29	0.2		1.1	1.8348
30	0.01		1.1	0.09174
MAX	0.78		MAX	7.350876
MIN	0.01		MIN	0.09174
Average	0.2433333333		Average	2.3696025

From: [McCabe, Kerri](#)
To: [McConnell, Melissa](#)
Subject: FW: Response to Violations
Date: Wednesday, November 29, 2017 12:55:23 PM
Attachments: [RESPONSE TO VIOLATIONS 11-28-17.pdf](#)
[image001.png](#)

Melissa,

Could you attach this email and attachment to WID 23018? I have updated Tracker. Thank you.

Kerri McCabe

Inspector Supervisor
ADEQ – Water Division
Field Services – Inspection Branch

Office – (501) 682-0642
Work Cell – (501) 352-5641
Fax – (501) 682-0880
5301 Northshore Drive
North Little Rock, AR 72118-5317



From: CLINTON WATER DEPT. [mailto:clintonwater2@gmail.com]
Sent: Tuesday, November 28, 2017 1:18 PM
To: McCabe, Kerri
Subject: Response to Violations

Kerri,

I have attached the response to the violations.

Please let me know if you need anything else.

Thanks,

Donna

--

Donna George

Clinton Water & Sewer Dept.

P.O. Box 277

Clinton, AR 72031

501-745-4320

CITY OF CLINTON
CLINTON WATER AND SEWER DEPARTMENT
P.O. BOX 277
CLINTON, AR 72031
TELEPHONE (501) 745-4320
FAX (501) 745-2164

Richard Hink, Manager

Richard McCormac, Mayor

November 28, 2017

Kerri McCabe, Inspector Supervisor
ADEQ
5301 Northshore Dr.
North Little Rock, AR 72118-5317

RE: Response to Violations

Dear Mrs. McCabe:

Violation #1:

The Treatment system failed due to a RAS pump failure. There were two RAS pumps. The motor was running in one but not pumping. The overload wasn't tripped so the other pump did not kick on. As soon as new pumps were available; they were replaced by Jack Tyler Engineers.

Violation #2:

After receiving your findings for our flow meter calibration, we contacted an engineering service to calibrate our flow meter. After two months of non-service; we contacted a second engineering service to perform the calibration. Due to conflicts in their schedule, they have scheduled this service to be completed this week of November 27, 2017.

We will report their findings as soon as their work is completed.

Should you have any questions, feel free to contact me at (501) 745-4320.

Sincerely,



Richard L. Hink, Manager
Clinton Water and Sewer Dept.

From: [McCabe, Kerri](#)
To: [McConnell, Melissa](#)
Subject: FW: RESPONSE TO VIOLATIONS
Date: Thursday, November 30, 2017 3:38:32 PM
Attachments: [PICTURE_CWS_GENERATOR.jpg](#)
[PICTURE_CWS_SIGN.jpg](#)
[RESPONSE TO VIOLATIONS 11-30-17.pdf](#)
[image001.png](#)

Melissa,

Would you please put this email and attachments with WID 23018, 23019, 23022? Thank you.

Kerri McCabe

Inspector Supervisor
ADEQ – Water Division
Field Services – Inspection Branch

Office – (501) 682-0642
Work Cell – (501) 352-5641
Fax – (501) 682-0880
5301 Northshore Drive
North Little Rock, AR 72118-5317



From: CLINTON WATER DEPT. [mailto:clintonwater2@gmail.com]
Sent: Thursday, November 30, 2017 2:32 PM
To: McCabe, Kerri
Subject: RESPONSE TO VIOLATIONS

Kerri,

I have attached the response to the violations.

Please let me know if you need anything else.

Thanks,

Donna

--

Donna George

Clinton Water & Sewer Dept.

P.O. Box 277

Clinton, AR 72031

501-745-4320



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TY OF CLINTON
CLINTON WATER AND SEWER DEPARTMENT
P.O. BOX 277
CLINTON, AR 72031
TELEPHONE (501) 745-4320
FAX (501) 745-2164

Richard Hink, Manager

Richard McCormac, Mayor

November 30, 2017

Kerri McCabe, Inspector Supervisor
ADEQ
5301 Northshore Dr.
North Little Rock, AR 72118-5317

RE: Response to Violations

Dear Mrs. McCabe:

Violation #1:

The Solids depth for the pond was measured on November 30, 2017. The steps taken to measure the pond were recommended by a representative of ADEQ. The attached drawing shows the location of each measurement. The following measurements were obtained:

Location	1	2	3	4	5
Water Depth	10'	10'	11'	10'	10'
Sludge Depth	2'	2'	3'	2'	2'

Violation #2:

Eric Sexton with Fleming Controls calibrated the Flow Meter on November 29, 2017, see attached sheet. He did state that he could do a spreadsheet if we needed it.

We have also included two pictures. One is a picture of the sign that we put on one of the Lift Stations. The other is a picture of the new trailer with the generator on it that we can use as any location if needed.

Should you have any questions, feel free to contact me at (501) 745-4320.

Sincerely,

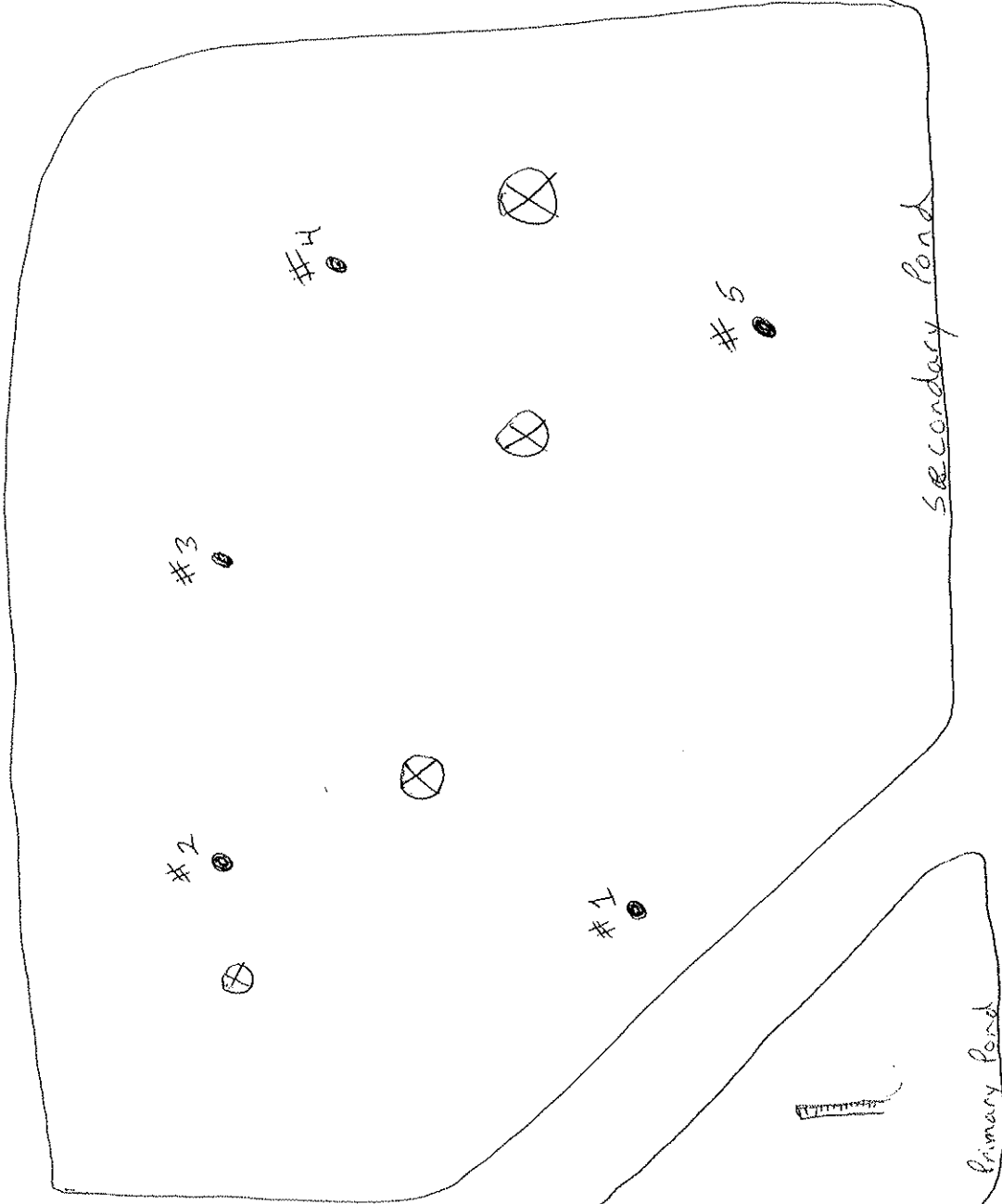


Richard L. Hink, Manager
Clinton Water and Sewer Dept.

Date 11-30-17

East Ponds

Clinton Water + Sewer



staff gauge

At Date of Sampling
Staff gauge Read
10' 9"

- Depth Sample
- ⊗ Aerator



Myers
Clinton Water & Sewer
501.745.4320



ADEQ

ARKANSAS
Department of Environmental Quality

January 26, 2018

Richard McCormac, Mayor
City of Clinton - Clinton Water & Sewer
PO Box 277
Clinton, AR 72031

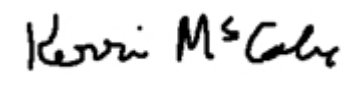
RE: City of Clinton East – Response to Inspections (Van Buren Co)
AFIN: 71-00018 **Permit No.: AR0048836**
ARR000060
5130-W

Dear Mayor McCormac:

I have reviewed the response pertaining to my June 20, 2017 inspections of the Clinton East WWTP. The information provided sufficiently addresses the violations referenced in my inspection reports. At this time, the Department has no further comment concerning these particular inspections. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at (501) 682-0642 or you may e-mail me at mccabe@adeq.state.ar.us.

Sincerely,



Kerri McCabe
Inspector Supervisor
Compliance Branch
Office of Water Quality