



November 17, 2021

Richard McCormac, Mayor City of Clinton P.O. Box 277 Clinton, AR 72301

# RE: City of Clinton- East Plant Inspection (Van Buren Co) AFIN: 71-00018 NPDES Permit No.: AR0048836

Dear Mayor McCormac:

On August 20, 2021, I performed a Compliance Evaluation Inspection of the abovereferenced 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 inspection report for any comments.

If I can be of any assistance please contact me at <u>jeremy.uhlmann@adeq.state.ar.us</u> or (870) 424-3322.

Sincerely,

Peremy Uhlman

Jeremy Uhlmann District II Inspector, Office of Water Quality 5301 Northshore Drive, North Little Rock, AR, 72118

414 088A8748		OFFICE OF WATER QUALITY INSPECTION REPORT								
	RONMENTAL LITY	AFIN: 71-00018 PERMIT #: AR004883							08/20/2021	
AND ENVIRON	EN UNDU	COUNTY: 71 Van B			Buren P		PDS #: <b>118204</b>			MEDIA: WN
		GPS LAT: 35.57955			1 LONG: -92.447203 LOCATION: General Area					Area
FAC	ILITY INFORMAT	ION			IN	SPEC	TION INF	ORN	IATIO	N
NAME: City of Clinton- East Plant					FACILITY TYPE:     INSPECTOR ID#:       1 - Municipal     33017 S - State					
Factory Road					FACILITY EVALUATION RATING 3 - Satisfactory			ISPECTION		Evaluation
Clinton, AR 72031					(-)	NTRY TIME: 0:06	EXIT TIME 11:22		PERMIT EF	FFECTIVE DATE:
RESPONSIBLE OFFICIAL								PERMIT EX	KPIRATION DATE:	
NAME: / TITLE Richard McCormac / Mayor								6/30/2	2024	
COMPANY:	, <b>,</b>				FAYETTEVILLE SHALE RELATED: N					
					FAYETTEVILLE SHALE VIOLATIONS: N					
P.O. Box 277					INSPECTION PARTICIPANTS					
CITY, STATE, ZIP: Clinton AR 72301					NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Phil Graham (Lic# 008981)/ Operator/ 501-253-1365/					
PHONE & EXT: / FAX:					clintonfire25@yahoo.com					
501-745-4320	1									
EMAIL: clintonmayor@arte	lco.com				Kerri McCabe/Inspector Supervisor/870-424-3322					
CONTACTED DURI		Yes	5							
	AREA EVALUATIONS									
S PERMIT	(S=S	atisfac S			sfactory, N=Not Applicable	/Evaluate **		<i>/</i> \\\/\\\		
S         PERMIT         S         FLOW MEASUR           S         RECORDS/REPORTS         S         LABORATORY					S	FACILI			WIEW	
S OPERATION &		** EFFLUENT/RECEIVING WATER		_				IG PROGRAM		
S SAMPLING		** SLUDGE HANDLING/DISP				**	PRETR			
** OTHER:							•			
					F FINDINGS					
On August 20, 2021 and at the time of inspection, no violations were noted.										

#### **GENERAL COMMENTS**

On August 20, 2021, this office conducted an inspection at the above mentioned facility. Inspector Supervisor Kerri McCabe was also present, along with Phil Graham, Operator. Mr. Graham was present for the duration of the inspection. This inspection consisted of a site assessment and records review.

#### Site assessment:

This municipal treatment system consists of two processes: an activated sludge process eventually discharging to Outfall 001 and also an irrigation process after secondary treatment. The irrigation process consists of a bar screen at the headworks, collection into wet well, a primary lagoon, secondary lagoon with four aerators, chlorine disinfection, then pumped to irrigation fields for permitted land application (5130-W-2). The discharge process consists of a primary pond, two-cell continuous flow stirred reactors (in parallel); secondary clarifier, sand filter, UV disinfection, post-aeration, and then to final discharge at Outfall 001. Sludge is wasted manually, approximately twice per week. There is a bar screen to trap floatables that the individual haulers are responsible for cleaning after dumping. There was no discharge at the time of inspection as land application has been allowed by the permit and chosen by the permittee.

#### Records review:

All records requested were made available. Records were reviewed from January, February, and March of 2020.

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INSPECTOR'S SIGNATURE: J J J J J J J J J J J J J J J J J J J	DATE: 11/10/2021
Kenri MS Cale	
SUPERVISOR'S SIGNATURE:Kerri McCabe	DATE: 11/16/2021

Inspection Report: City of Clinton- East Plant, AFIN: 71-00018, Permit #: AR0048836

Inspection Report: City of Clinton- East Plant, AFIN: 71-00018, Permit #:	AR0040030
SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	ØS OM OU ONA ONE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	🗹 y 🗖 n 🗖 na 🗇 ne
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
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	
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:	🗹 Y 🗆 N 🗆 NA 🗇 NE
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:	OS OM OU ONA ØNE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	OS OM OU ONA ØNE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	Øy 🛛 n 🖾 na 🖾 ne
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	
TREATMENT UNITS PROPERLY MAINTAINED:	
STANDBY POWER OR OTHER EQUIVALENT PROVIDED:     ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	
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:	

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS       ØS IM IU INA INE         DETAILS:       Image: Samples taken at site(s) Specified in Permit:       Image: Site(s)
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:       Image: Image
2.       LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:       Image: Stress and the stress a
3.       FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:       Image: Imag
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:       Image: Complete Comple
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:       Image:
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:       Image: Image
a. SAMPLES REFRIGERATED DURING COMPOSITING:       Image: Comparison of the compa
b. PROPER PRESERVATION TECHNIQUES USED:   c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:   7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:   9 </td
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:   7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:   IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:   IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:   IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:   IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:   IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:   IF MONITORING IS PERFORMENT   IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:   IF MONITORING IS PERFORMENT
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:       Image: I
SECTION E: FLOW MEASUREMENT         PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS         ØS IM U INA INE         DETAILS:         1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: Yes_ TYPE OF DEVICE: 6" Parshall flume
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS       Image: Comparison of the state of th
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS       Image: Comparison of the state of th
DETAILS: 1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: Yes TYPE OF DEVICE: 6" Parshall flume
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: Yes_ TYPE OF DEVICE: 6" Parshall flume 🗹 Y 🗅 N 🗅 NA 🗍 NE
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
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:       □Y □N □NA ☑NE
6. SPIKED SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:
7. COMMERCIAL LABORATORY USED:
a. LAB NAME: <u>Environmental Services Company</u>
b. LAB ADDRESS: 13715 West Markham, Little Rock AR
c. PARAMETERS PERFORMED: TSS, DO, NH3-N, E. coli, Fecal Coliform and CBOD5.
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:

SECTION G	SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS								
BASED ON VISUAL OBSERVATIONS ONLY									
DETAILS:									
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER		
001	N/A	N/A	N/A	N/A	N/A	N/A			
SECTION H	: SLUDGE DIS	POSAL							
SLUDGE D	DISPOSAL MEE	ETS PERMIT F	REQUIREMENT	ГS			]U ⊠NA ⊡NE		
DETAILS:									
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊡s ⊡m			
2. SLUDGE R	ECORDS MAINTAINED	O AS REQUIRED BY 40	) CFR 503:			⊡s ⊡m	DU 🕅 NA DNE		
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):				
SECTION I:	SAMPLING IN	SPECTION PRO	CEDURES						
SAMPLE R	ESULTS WITH	HIN PERMIT R	EQUIREMENT	S			]U ØNA □NE		
DETAILS:									
1. SAMPLES	OBTAINED THIS INSPE	ECTION:				ΠY	On Øna One		
2. TYPE OF S	AMPLE: GRAB:		METHOD: FREQUE	NCY:					
3. SAMPLES PRESERVED:						ΠY			
4. FLOW PRC	PORTIONED SAMPLE	S OBTAINED:							
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE	/ICE:			ΠY	⊡n Øna ⊡ne		
6. SAMPLE R	EPRESENTATIVE OF	OLUME AND NATUR	E OF DISCHARGE:				On Øna One		
7. SAMPLE SI	PLIT WITH PERMITTER	:					On Øna One		
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:							
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			ΠY			
	: STORM WAT								
	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS			IU ⊠NA ⊡NE		
DETAILS:									
-	DATED AS NEEDED:								
-	NCLUDING ALL DISCH		CE WATERS:						
	3. POLLUTION PREVENTION TEAM IDENTIFIED:								
	DTENTIAL POLLUTANT								
	DTENTIAL SOURCES A								
	TORM WATER DISCH	AKGES ARE AUTHOR	IZED:						
	RUCTURAL BMPS:								
	DN-STRUCTURAL BMF								
TT. INSPECTIC	INS CONDUCTED AS I								

## **DMR Calculation Check**

Reporting Period:	From	<u>2020</u> Year	03 Month	01 Day	_ To _	2020 Year	03 Month	<u>31</u> Day
Parameter Checked:		NH3-N	_					
		Loading Mass					ntration hthly	
	Mo.	Avg Ibs/o	day	Mo. A	vg r		•	/g mg/l
Reported Value:		0.71			0.09		0.	22
Calculated Value:		0.69		(	0.086		0.	22
Permit Value:		63.1			6.3		9	.5

If calculated value does not equal reported value, explain:

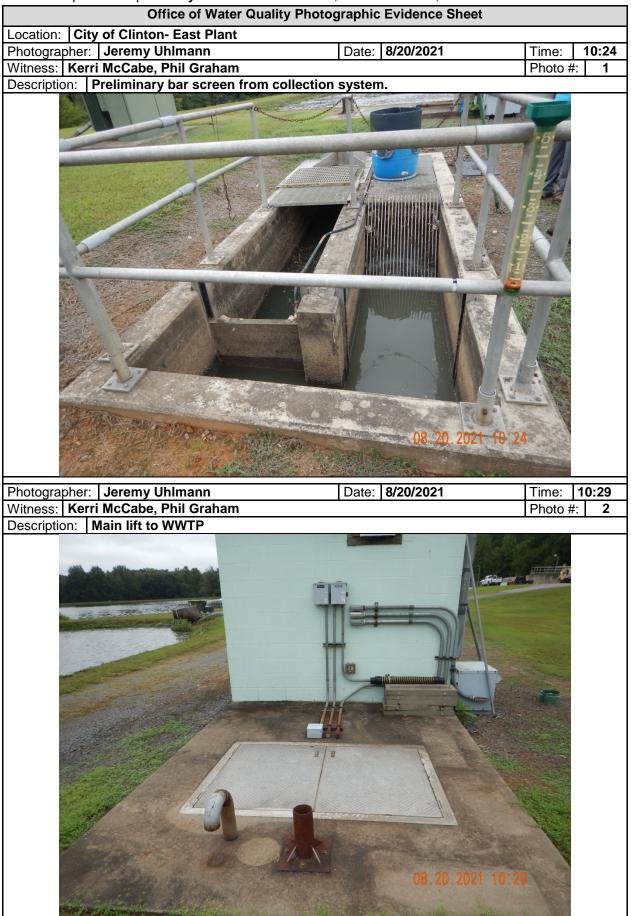
Values are similar; which is likely due to rounding (below permit limits).

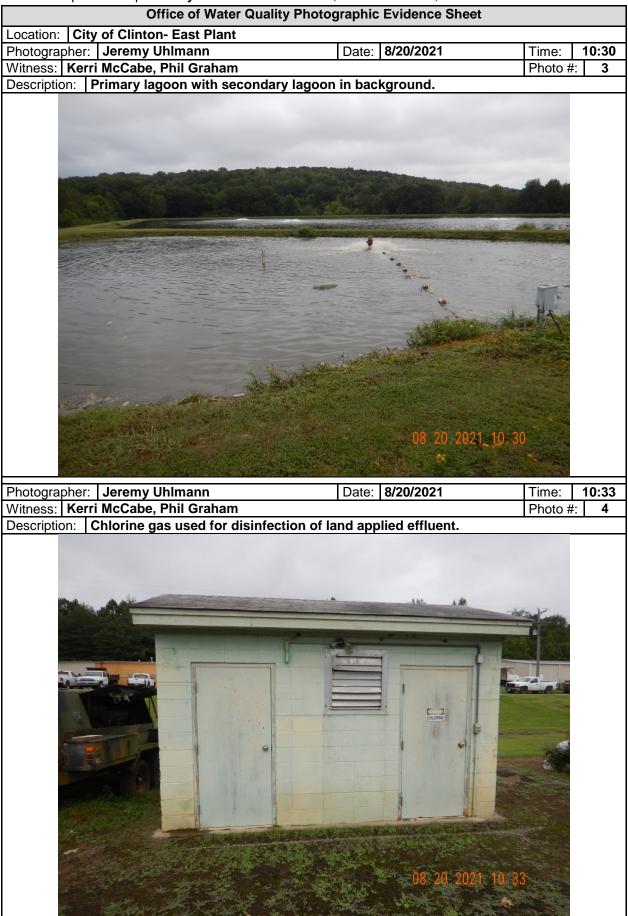
## **DMR Calculation Check**

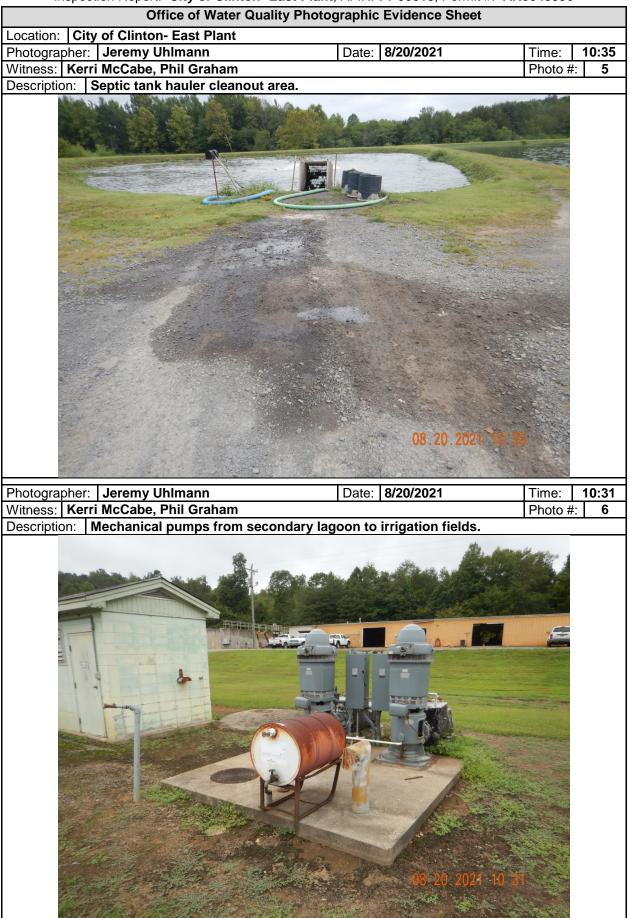
Reporting Period:	From	2020 Year	01 Month	01 Day	_ To _	2020 Year	01 Month	01 Day
Parameter Checked:		TSS	-					
		Loading Mass				Concer Mon		
	Mo.	Avg Ibs/c	lay	Mo. A	vg r		7-day Avg	mg/l
Reported Value:		44.7	·		4.82		7.63	3
Calculated Value:		41.5			4.82		7.63	3
Permit Value:		200.2			20.0		30.0	)

If calculated value does not equal reported value, explain:

# Values are similar; which is likely due to rounding (below permit limits).







Office of Water Quality Pho	tographic Evidence Sheet	
Location: City of Clinton- East Plant		
Photographer: Jeremy Uhlmann	Date: 8/20/2021	Time: 10:40
Witness: Kerri McCabe, Phil Graham		Photo #: <b>7</b>
Description: 1 of 2 aeration basins.		the fait of the
	08 20 2021 10	40
Photographer: Jeremy Uhlmann	Date: 8/20/2021	Time: <b>10:46</b>
Witness: Kerri McCabe, Phil Graham		Photo #: 8
Description:       Secondary clarifier		

	Quality Photographic Evidence Sheet	
Location: City of Clinton- East Plant		
Photographer: Jeremy Uhlmann	Date: 8/20/2021	Time: 10:47
Witness: Kerri McCabe, Phil Graham Description: Sand Filter		Photo #: 9
Description: Sand Filter		
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		All Maria
		A DATE
	08.20.2021 1	0 47
Photographer:Jeremy UhlmannWitness:Kerri McCabe, Phil Graham	Date: 8/20/2021	Time: 10:49
		Photo # 10
	vmer and pH adjustments.	Photo #: 10
	vmer and pH adjustments.	Photo #: 10
	vmer and pH adjustments.	Photo #: 10
	mer and pH adjustments.	Photo #: 10
Description: Chemical storage for poly	vmer and pH adjustments.	Photo #: 10
Description: Chemical storage for poly	rmer and pH adjustments.	Photo #: 10
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Description: Chemical storage for poly		Photo #: 10
Description: Chemical storage for poly		Photo #: 10

Office of Water	Quality Photographic Evidence Sheet	
Location: City of Clinton- East Plant		
Photographer: Jeremy Uhlmann	Date: 8/20/2021	Time: 10:49
Witness: Kerri McCabe, Phil Graham		Photo #: 11
Description: UV disinfection to flow g	gauge.	
		0. 49
		Times   40-40
Photographer: Jeremy Uhlmann Witness: Kerri McCabe, Phil Grabam	Date: 8/20/2021	Time: 10:49
Witness: Kerri McCabe, Phil Graham	Date: 8/20/2021	Time:         10:49           Photo #:         12
	Date: 8/20/2021	
Witness: Kerri McCabe, Phil Graham		
Witness:       Kerri McCabe, Phil Graham         Description:       UV disinfection bulbs	Date: 8/20/2021	
Witness:       Kerri McCabe, Phil Graham         Description:       UV disinfection bulbs		
Witness:       Kerri McCabe, Phil Graham         Description:       UV disinfection bulbs		
Witness:       Kerri McCabe, Phil Graham         Description:       UV disinfection bulbs		
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Office of Water Quality Phot	ographic Evidence Sheet	
Location: City of Clinton- East Plant		
Photographer: Jeremy Uhlmann	Date: 8/20/2021	Time: 10:50
Witness: Kerri McCabe, Phil Graham		Photo #: 13
Description: 6" Parshall flume		and the second second second second
Photographer: Jeremy Uhlmann	Date: 8/20/2021	Time: 10:52
Witness: Kerri McCabe, Phil Graham	diacheraine)	Photo #: 14
<image/>	discharging).	

Figure 1. Google Earth image of Clinton East and Outfall 001 (imagery dated Sept 15, 2019).

