

January 30, 2024

Honorable Richard McCormac, Mayor City of Clinton PO Box 277

Clinton, AR 72031

Email Address: clintonmayor@artelco.com; clintonwater9@gmail.com; clintonwater9@gmail.com; clintonwater9@gmailto:com; clintonwater9@gmailto:com; clintonwater9@gmailto:com; clintonwater9@gmailto:com; clintonwater9@gmailto:com; clintonwater9@gmailto:com; <a href="mailto:clintonwater9@gmailto:clintonwater9

RE: Clinton East WWTF Inspections - PDS 127698 & 127699

AFIN: 71-00018 NPDES Permit No.: AR0048836 / ARR000060

Dear Mayor McCormac:

On February 23, 2023, DEQ performed a Compliance Evaluation Inspection and an Industrial Stormwater (No-Exposure) 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 each of the inspection reports are enclosed for your records.

Please refer to the "Summary of Findings" section of each of the inspection reports and provide a written response for each item that was noted. This response should be emailed to the attention of the Office of Water Quality - Compliance Branch at Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. The corrective action(s) should be completed as soon as possible and the written response with all necessary documentation (i.e., photos) is due by February 14, 2024.

If I can be of any assistance, please contact me at Jason. Bolenbaugh@adeq.state.ar.us or (501) 682-0659.

Sincerely,

Jason Bolenbaugh

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Compliance Branch Manager, Office of Water Quality



ENVIRONMENTAL QUALITY

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **71-00018** PERMIT #: **AR0048836** DATE: **2/28/2023**

COUNTY: **71 Van Buren** PDS #: **127698** MEDIA: **WN**

GPS LAT: 35.580475 LONG: -92.448215 LOCATION: Entrance

FACILITY INFORMATION	INSPECTION INFORMATION				
Clinton East WWTF	facility type: 1 - Municipal	INSPECTOR ID#: 84022 S - \$	State		
Factory Rd	FACILITY EVALUATION RATING 3 - Satisfactory	:	Comp	on TYPE: Diance Evaluation	
Clinton, AR	\ <i>'</i>	9:00 10:		PERMIT EFFECTIVE DATE: 7/1/2019	
RESPONSIBLE OFFICIAL				PERMIT EXPIRATION DATE:	
NAME: / TITLE Honorable Richard McCormac / Mayor				6/30/2023	
COMPANY:	FAYETTEVILLE	SHALE REL	ATED:	N	
City of Clinton MAILING ADDRESS:	FAYETTEVILLE SHALE VIOLATIONS: N INSPECTION PARTICIPANTS				
PO Box 277					
CITY, STATE, ZIP: Clinton AR 72031 PHONE & EXT: / FAX: 501-745-4320 / EMAIL: clintonmayor@artelco.com	Phil Graham (Lic clintonfire25@y Will Hinchey, Ma Trinity Mitchell,	c# 008981)/ ahoo.com anager/clint	onwate		
CONTACTED DURING INSPECTION: ***					
AREA EVALUATIONS					

	(3-Satisfactory, in-marginal, 0-Offsatisfactory, N-Not Applicable/Evaluated)				
S	PERMIT	S	FLOW MEASUREMENT	M	STORMWATER
s	RECORDS/REPORTS	S	LABORATORY	S	FACILITY SITE REVIEW
S	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM
S	SAMPLING	S	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT
**	OTHED:				

** | OTHER:

SUMMARY OF FINDINGS

No violations noted during the time of the inspection.

Please see separate inspection for NPDES permit ARR000060 for areas that need to be addressed with a written response.

GENERAL COMMENTS

On February 28, 2023, an inspection was conducted with the participants mentioned above. The inspection consisted of a site assessment and a records review.

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.

Sludge is wasted manually, approximately twice per week. Sludge is stored in the onsite lagoon(s). Lagoons can act as EQ. There is a makeshift bar screen at the primary lagoon to trap floatables that are dumped into the lagoon from septic tank haulers. This route is used in place of direct discharge into the collection system, and the individual haulers are responsible for cleaning the bar screen after dumping their loads.

Records Review:

Records from April and November 2022 were requested and provided. No issues were noted with the supplied records.

INSPECTOR'S SIGNATURE:	DATE:
Jan Ralleboog	
SUPERVISOR'S SIGNATURE: Jason Bolenbaugh	DATE: 1/25/2024

OFOTION A DEDMIT VEDICION TION	
SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	ØS □M □U □NA □NE
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:	□y □n ☑na □ne
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	✓Y □N □NA □NE
4. ALL DISCHARGES ARE PERMITTED:	✓Y □N □NA □NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S □M □U □NA □NE
DETAILS: Contract lab for all sample collection/analyses.	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y □N □NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	☑S ☐M ☐U ☐NA ☐NE
a. DATES AND TIME(S) OF SAMPLING:	☑y □n □na □ne
b. EXACT LOCATION(S) OF SAMPLING:	☑y □n □na □ne
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☑Y □N □NA □NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☑Y □N □NA □NE
e. RESULTS OF CALIBRATIONS:	☑Y □N □NA □NE
f. RESULTS OF ANALYSES:	⊠y □n □na □ne
g. DATES AND TIMES OF ANALYSES:	⊠y □n □na □ne
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☑Y □N □NA □NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	□S □M □U □NA ☑NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	□S □M □U □NA ☑NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	⊠y □n □na □ne
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	☑S □M □U □NA □NE
DETAILS: Preliminary, primary lagoon, activated sludge, final clarifier, sand filter, UV dis	infection, and post-aeration.
TREATMENT UNITS PROPERLY OPERATED:	⊠S □M □U □NA □NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	☑S ☐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:	⊠s □m □u □na □ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	⊠s □m □u □na □ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	□s □m □u □na ☑ne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	□Y □N □NA ☑NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: Operator can route to lagoon system.	☑Y □N □NA □NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	□Y ØN □NA □NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	DY DN ØNA DNE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	□Y □N ☑NA □NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	

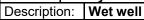
SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS: Contract lab for all sample collection/analyses.	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y □N □NA □NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑y □n □na □ne
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☑Y ☐N ☐NA ☐NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y □N □NA □NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y □N □NA □NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑y □n □na □ne
b. PROPER PRESERVATION TECHNIQUES USED:	☑Y □N □NA □NE
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:	□Y □N ☑NA □NE
SECTION E: FLOW MEASUREMENT	,
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: YES TYPE OF DEVICE: 6" Parsha	all Flume
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y □N □NA □NE
 SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: <u>HydroRang</u>((totalizer) 	er 200
4. CALIBRATION FREQUENCY ADEQUATE:	☑y □n □na □ne
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	Øy □n □na □ne
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	□Y □N □NA ☑NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y □N □NA □NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y □N □NA □NE
9. HEAD MEASURED AT PROPER LOCATION:	☑Y □N □NA □NE
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS: Contract lab for all sample collection/analyses.	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES):	☑Y □N □NA □NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	□y □n ☑na □ne
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☑Y □N □NA □NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	☑Y □N □NA □NE
5. DUPLICATE SAMPLES ARE ANALYZED >10% OF THE TIME:	☑Y □N □NA □NE
6. SPIKED SAMPLES ARE ANALYZED >10% OF THE TIME:	☑Y □N □NA □NE
7. COMMERCIAL LABORATORY USED:	Øy □n □na □ne
a. LAB NAME: Environmental Services Company / Bio-Analytical Laboratories	
b. LAB ADDRESS: 13715 W Markham, Little Rock, AR 72211	
c. PARAMETERS PERFORMED: CBOD5, TSS, NH3, DO, FCB, E. coli, TP, NO3+NO2-N, Total Recoverable Cd, Total Recovera	
8. BIOMONITORING PROCEDURES ADEQUATE: Part I, Sec B requires progress reports for WET.	ØY □N □NA □NE
a. PROPER ORGANISMS USED:	✓Y □N □NA □NE
b. PROPER DILUTION SERIES FOLLOWED:	ØY □N □NA □NE
c. PROPER TEST METHODS AND DURATION:	✓Y □N □NA □NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	Øy □n □na □ne

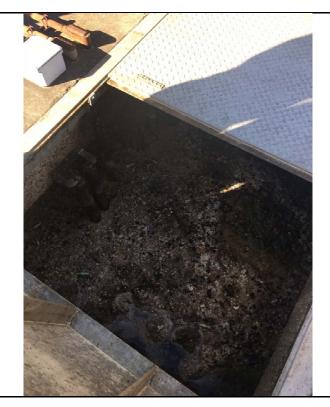
SECTION G	: EFFLUENT/R	RECEIVING WAT	TERS OBSERVA	ATIONS						
BASED ON	N VISUAL OBS	ERVATIONS C	ONLY			⊠s □m □	U ⊠NA □NE			
DETAILS:	Viewed at Outf	all 001 at post-a	eration.							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER			
001	NO	NO	NO	SLIGHT	NO	CLEAR				
SECTION H	SECTION H: SLUDGE DISPOSAL									
SLUDGE D	DISPOSAL MEI	ETS PERMIT F	REQUIREMEN	TS		⊠s □m □	U □NA □NE			
DETAILS:	Stored in prima	ar <u>y</u>								
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			□s □м	□U □NA □NE			
2. SLUDGE R	ECORDS MAINTAINE	D AS REQUIRED BY 40) CFR 503:			□s □м	□U □NA □NE			
3. FOR LAND	APPLIED SLUDGE, T	YPE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):					
SECTION I:	SAMPLING IN	SPECTION PRO	CEDURES							
SAMPLE F	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ⊠NA □NE			
DETAILS:										
1. SAMPLES	OBTAINED THIS INSP	ECTION:				□Y	□n Øna □ne			
2. TYPE OF SAMPLE: GRAB: GCOMPOSITE: METHOD: FREQUENCY:										
3. SAMPLES PRESERVED: □Y □N ☑NA □NI										
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:				□Y	□n ☑na □ne			
5. SAMPLE O	BTAINED FROM FACI	LITY'S SAMPLING DE\	/ICE:			□Y	□n ☑na □ne			
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			□Y	□n ☑na □ne			
7. SAMPLE S	PLIT WITH PERMITTE	E:				□Y	□n ☑na □ne			
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:				□Y	□n ☑na □ne			
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			□Y	□N ☑NA □NE			
SECTION J	: STORM WAT	ER POLLUTION	PREVENTION	PLAN						
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS		□S ØM □	U DNA DNE			
DETAILS:	Part II, Condition	on 6 requires Bl	MP for stormwa	ter protection;	inspected under	ARR000060.				
1. SWPPP UP	PDATED AS NEEDED:	_ DATE OF LAST UP	DATE:			□Y	□N ☑NA □NE			
2. SITE MAP	INCLUDING ALL DISC	HARGES AND SURFA	CE WATERS:			□Y	□N ☑NA □NE			
3. POLLUTIO	N PREVENTION TEAM	I IDENTIFIED:				□Y	□N ☑NA □NE			
4. POLLUTIO	N PREVENTION TEAM	PROPERLY TRAINED) :			□Y	□N ☑NA □NE			
5. LIST OF PO	OTENTIAL POLLUTAN	T SOURCES:				□Y	□n ☑na □ne			
6. LIST OF PO	OTENTIAL SOURCES A	AND PAST SPILLS ANI	D LEAKS:			□Y	□n Øna □ne			
7. ALL NON-S	STORM WATER DISCH	IARGES ARE AUTHOR	RIZED:			□Y	□n Øna □ne			
8. LIST OF ST	RUCTURAL BMPS:					□Y	□n Øna □ne			
9. LIST OF NO	ON-STRUCTURAL BMF	PS:				□Y	□n Øna □ne			
10. BMPS PRC	PERLY OPERATED A	ND MAINTAINED:				□Y	□n Øna □ne			
11. INSPECTIO	ONS CONDUCTED AS	REQUIRED:				□Y	□n Øna □ne			

Office of Water Quality Photographic Evidence Sheet								
Location:	Clinton East WWTF							
Photograp	her: Kerri McCabe	Date:	Feb 28, 2023	Time:	0919			
Witness: Trinity Mitchell Photo #: 1								
Description	Description: Bar screen							



District Transfer Mittell all	
Witness: Trinity Mitchell Photo #	2





Office of Water Quality Photographic Evidence Sheet							
Location:	Clinton East WWTF						
Photograp	her: Kerri McCabe	Date:	Feb 28, 2023	Time:	0921		
Witness:	Witness: Trinity Mitchell Photo #: 3						
Description	n: Primary Lagoon						



Photograp	oher: Kerri McCabe	Date:	Feb 28, 2023	Time:	1001
Witness:	Trinity Mitchell			Photo #:	4

Description: Levee between primary and secondary lagoons.



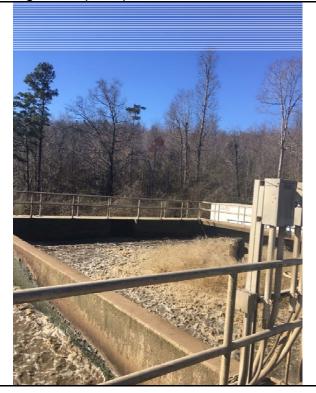
Office of Water Quality Ph	otographic	Evidence Sheet		
Location: Clinton East WWTF				
Photographer: Kerri McCabe	Date:	Feb 28, 2023	Time:	0931
Witness: Trinity Mitchell			Photo #:	5

Description: Activated sludge basin (1 of 2)



Photographer: Kerri McCabe	Date:	Feb 28, 2023	Time:	0931
Witness: Trinity Mitchell			Photo #:	6

Description: Activated sludge basin (2 of 2)



Office of Water Quality Photographic Evidence Sheet							
Location:	Clin	ton East WWTF					
Photograp	her:	Kerri McCabe	Date:	Feb 28, 2023	Time:	0933	
Witness:	Witness: Trinity Mitchell Photo #: 7						

Description: Final clarifier with floating scum outside center baffle



						_
Photographer:	Kerri McCabe	Date:	Feb 28, 2023	Time:	0933]
Witness: Trin	ity Mitchell			Photo #:	8	

Description: Final clarifier with scum contained to one side



	Office of Water Qua	lity Photographic	Evidence Sheet			
Location: (Clinton East WWTF					
Photograph	er: Kerri McCabe	Date:	Feb 28, 2023	Time:	0934	
Witness: T	Witness: Trinity Mitchell Photo #: 9					
Description	RAS/WAS from clarifier					



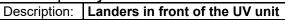
Photographer: Kerri McCabe	Date:	Feb 28, 2023	Time:	0941
Witness: Trinity Mitchell			Photo #:	10

Description: Rapid sand filter after clarifier





Photographer: Kerri McCabe	Date: Feb 28, 2023	Time:	0948
Witness: Trinity Mitchell		Photo #:	12





Office of Water Quality Photographic Evidence Sheet							
Location:	Clin	ton East WWTF					
Photograp	her:	Kerri McCabe	Date:	Feb 28, 2023	Time:	0949	
,						13	

Description: Parshall flume (primary) and totalizer (secondary)



Photographer: Kerri McCabe	Date: Feb 28, 2023	Time:	0954
Witness: Trinity Mitchell		Photo #:	14

Description: Post-aeration at outfall



Office of Water Quality Photographic Evidence Sheet							
Location:	Clin	ton East WWTF					
Photograp	her:	Kerri McCabe	Date:	Feb 28, 2023	Time:	1003	
Witness:	• • • • • • • • • • • • • • • • • • • •					: 15	

Description: Pumps for routing partially treated wastewater to irrigation fields.

Photographer: Kerri McCabe	Date:	Feb 28, 2023	Time:	1003
Witness: Trinity Mitchell			Photo #	16

Description: Manhole for irrigation distribution



Office of Water Quality Photographic Evidence Sheet								
Location: (Clin	on East WWTF						
Photographe	er:	Kerri McCabe		Date:	Feb 28	, 2023	Time:	1003
Witness: Ti	Witness: Trinity Mitchell Photo #: 17							

Description: Chlorine disinfection for wastewater routed to irrigation fields



Photographer: Kerri McCabe	Date:	Feb 28, 2023	Time:	1022
Witness: Trinity Mitchell			Photo #	: 18

Description: **Example of irrigation field**



Figure 1. Google Earth image dated Oct 16, 2019 depicting the Clinton – East POTW.

