



ARKANSAS

ENERGY & ENVIRONMENT

September 20, 2021

Honorable Richard McCormac, Mayor
 City of Clinton
 P.O. Box 277
 Clinton, AR 72031

EMAIL: clintonmayor@artelco.com

**RE: NPDES Permit Number: AR0048836, AFIN: 71-00018
 Corrective Action Plan Request**

Dear Mayor McCormac:

The Division of Environmental Quality, Office of Water Quality (DEQ) has performed a review of the Discharge Monitoring Reports submitted by the City of Clinton from August 1, 2018, through July 31, 2021. The review revealed that the facility has reported the following eleven (11) violations of Part I, Section A of the Permit:

DMR End Date	Discharge Number	Parameter Description	DMR Value Qualifier Code	Reported DMR Value	Permit Limit	Vio %
01/31/2020	001-A	Cadmium, total recoverable (MO AVG, lb/d)	<	<9.5	.02	47,400%
02/29/2020	001-A	Cadmium, total recoverable (MO AVG, lb/d)	<	<8.2417	.02	41,108%
03/31/2020	001-A	Cadmium, total recoverable (MO AVG, lb/d)	<	<8.1967	.02	40,883%
04/30/2020	001-A	Cadmium, total recoverable (MO AVG, lb/d)	<	<8.325	.02	41,525%
04/30/2020	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	<	<2419.6	2000	21%
05/31/2020	001-A	Cadmium, total recoverable (MO AVG, lb/d)	<	<8.4333	.02	42,066%
06/30/2020	001-A	Cadmium, total recoverable (MO AVG, lb/d)	<	<7.925	.02	39,525%
01/31/2021	001-A	Cadmium, total recoverable (MO AVG, lb/d)	=	0.05	.02	150%
01/31/2021	001-A	E. coli (MO AVG, MCFU/d)	=	93508.2	93100	0%
01/31/2021	001-A	E. coli (7 DA AVG, #/100mL)	=	8670.7	2050	323%
02/28/2021	001-A	Cadmium, total recoverable (MO AVG, lb/d)	=	0.056	.02	180%

As a result of this review, DEQ requests that the City of Clinton, submit the following information to DEQ:

- A Corrective Action Plan (CAP). The CAP shall be certified by a Professional Engineer (PE) licensed in the state of Arkansas and at a minimum, shall include the following information:
 - The cause of the violations.

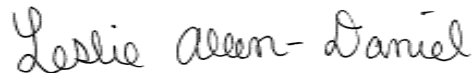
- Evaluation of the current permitted treatment system for compliance within the requirements of your permit.
- The actions taken and to be taken to correct and prevent the recurrence of the effluent violations.
- A milestone schedule for compliance with the permitted effluent limitations.
- A final date of compliance for when the necessary corrective actions will be completed.

The CAP should be submitted to DEQ by **October 29, 2021**. The document may also be emailed to me at allen-daniel@adeq.state.ar.us. Please make sure you also sign the CAP along with the engineer.

Any violation of your NPDES Permit is subject to enforcement action by this Division, pursuant to the Arkansas Water and Air Pollution Control Act. The regulations and your NPDES Permit require that you take all reasonable measures necessary to eliminate or prevent the occurrence of violations.

Should you have any questions concerning the above referenced compliance issues, please feel free to contact me at 501-682-0630, or you may e-mail me at allen-daniel@adeq.state.ar.us.

Sincerely,



Leslie Allen-Daniel
Enforcement Coordinator, DEQ, OWQ
5301 Northshore Drive, North Little Rock, AR 72118

Cc: Jackie W. Hinchey Jr. Manager clintonwater9@gmail.com