

Agenda

DEQ In Person and Zoom Meeting with City of Clinton – East AR0048836

Thursday, March 2, 2023 at 10:00am

1. Introductions
2. Sample Testing for Cadmium and Discharge Monitoring Reports:
 - a) Clinton submitted lab results from three different labs that showed non-detect from effluent and influent with no excursions for Cadmium.
 - b) Clinton asked about getting the Cadmium taken off of the permit. It was discussed that the Cadmium had most likely been placed in this permit due to excursions during the last permit cycle. They also stated that the Cadmium could show as an excursion due to bad sampling techniques.
 - c) DEQ stated that if the sample continued to show no excursions, they could consider a permit modification to have it removed. DEQ advised that in order to have the limit for cadmium removed, they would most likely need to show a longer history of compliance with the limit.
 - d) Clinton stated that they found an error with the computer calculations for the loading rates from the lab, which was what was causing the exceedances. Clinton stated that the lab had calculated the loading rate in micrograms instead of milligrams, causing the previous excursions.
 - e) Clinton stated that they will be resubmitting the DMRs with the corrections. DEQ asked that they send an email when this is completed so DEQ can resolve the late DMRs that will generate. DEQ stated that Clinton will need to submit a summary of the results and detail how the samples were corrected.
 - f) DEQ asked if Clinton has had any issues with the WET test. Clinton stated that they had failed the last Bio Test for water fleas. DEQ asked if ESC was the primary sampling lab. Clinton stated yes and that American Interplex had ran the backup sample. There was an issue with the way that the samples were being taken by ESC in December.
3. Permit Modification:
 - a) Clinton stated that when all of the data is sent from the lab they will send a summary of the information and request a permit modification. DEQ stated that in order to consider a permit modification, they will need to see the new data but there will need to be enough data to be able to run calculations and a reasonable assumption test.

- b) Clinton stated that they will have 18 data sets between now and the new permit cycle.
 - c) DEQ stated that the application needs to be submitted on time but that Clinton can continue to sample and demonstrate that they are under the limit for Cadmium. Clinton stated that they have been under the permit limit except for December. Clinton stated that they needed to change the tubes in the sampler.
4. Summary of Information For Permit Renewal :
- a) Clinton will need to include the information about the rented samplers and the results from the three different labs and describe the actions that will be taken in the future for sample collections. Clinton will need to collect the needed number of data points
 - b) DEQ stated that they will look at the old data. DEQ advised that Clinton should not apply for a permit modification until the time of the permit renewal so that more data can be collected.
 - c) DEQ stated that if there are any unexplained violations it could cause a denial in the permit modification to remove cadmium.
 - d) Clinton stated that both ESC and American Interplex come on the same day. Clinton wants all of the lab samples to follow the EPA sampling methods.
5. Standard Operating Procedures for Sampling:
- a) DEQ asked if the labs had Standard Operating Procedures for sample collections. Clinton stated that the labs say that they do but that the sample techs do not follow the SOP's.
 - b) DEQ ask if the SOP issues have been documented. Clinton stated that these issues have been documented. DEQ ask that this documentation be included on the summary.
6. Land Application Permit Renewal:
- a) Clinton asked about the Land Application being renewed.
 - b) Clinton stated that if the permit is approved they will implement the needed improvements. If this permit is not approved or renewed that no improvements will be made.
 - c) DEQ stated that if the permit is renewed that the Land Application will be delayed until the improvements have been made.
 - d) Clinton stated that they have capped the pop up spray heads that are closest to the river.

7. Conclusion:

- a) Clinton will send a summary of the events regarding the excursions with cadmium and correct the DMRs
- b) DEQ asked that Clinton draft a letter and attach to the DMRs explaining why they were corrected. This can be the same letter for each month.
- c) DEQ still plans to follow-up with a CAO for various other compliance issues.