



ARKANSAS

ENERGY & ENVIRONMENT

Facility: City of Clinton

Date: 8-17-22

^{Engineer}
Meeting Attendance
^{Engineer Supervisor}

ungerank@adeq.state.ar.us (501) 682-0047

jessica.sears@adeq.state.ar.us (501) 682-0621

Colby Ungerank
Jessica Sears

DEQ
DEQ

Name	Organization	Job Title	E-Mail Address	Telephone Number
Richard Healey	DEQ	Enforcement Branch Manager	healey@adeq.state.ar.us	501-682-0640
Leslie Allen-Daniel	DEQ	OWQ Enforcement Coordinator	allen-daniel@adeq.state.ar.us	501-682-0630
Stacie Wassell	DEQ	Deputy Associate Director	Wassell@adeq.state.ar.us	501-682-0886
Guy Lester	DEQ	Permit Engineer	lester@adeq.state.ar.us	501-519-0304
Tom Harrington	DEQ	Enforcement Analyst	Thomas.harrington@adeq.state.ar.us	501-682-0699
Bryan Leamons <i>BL</i>	DEQ		leamons@adeq.state.ar.us	501-682-0656
Alan York	DEQ	Associate Director		
Katherine McWilliams	DEQ	Permit Engineer	mckilliamsk@adeq.state.ar.us	501-682-0651
Jamal Solaimanian	DEQ	Permit Engineer Supervisor	jamal@adeq.state.ar.us	501-682-0620
Kyle Breckenridge <i>KB</i>	SALT Engineers	P.E.	kbreckenridge@saltengineers.com	501-766-9832
Phil Graham	Clinton	Operator	Clintonfire25@yahoo.com	501-253-1365
Jackie W. Hincley	Clinton Water	Manager		
Kent Cates	Clinton Water			501-253-8281
Nick Williams	SALT Engineers	PM	nwilliams@saltengineers.com	501-206-1982
Richard McCormac	City of Clinton Mayor	Mayor	clintonmayor@artelco.com	(501) 253-0160

AGENDA

DEQ In person and Zoom meeting with City of
Clinton

Wednesday, August 17, 2022 at
2:30pm

1. Introductions
2. Cadmium Questions:
 - a. The City of Clinton stated that samples were sent to American Interplex Corporation and showed no cadmium, but the sample sent to Environmental Services Company (ESC) came back as exceeding the limit. They were duplicate samples sent from the Greer's Ferry and the outfall
 - b. Discussed sampling plans and the CAP request and asked about the backwash pond and pushing that water to the lagoon.
 - c. DEQ has issues with Cadmium levels and the amount solids that would be added to the lagoon.
 - d. No industry in the city that uses cadmium, so no obvious source.
3. Corrective Action Plan:
 - a. City of Clinton stated that they used the published standards for hydraulic conductivity and a multiplier of 25% for infiltration
 - b. DEQ, stated that he believed a soil test would be best for hydraulic conductivity
4. Groundwater Levels:
 - a. DEQ Discussed depth of the groundwater
 - b. City of Clinton stated that they have four shallow wells that are sampled
 - c. Test wells are 12 feet to 15 feet deep.
 - i. Sampling data
 - ii. Irrigation Limits
 - d. Was anyone was checking to see if the test results are above permit limits before land applying
 - e. If it is an exceedance of permit limits do not land apply.
 - f. If the limits are exceeded, more tests are needed

- g. City of Clinton will propose changing the sampling point from the lagoon to the lines before it is applied.

5. Annual Report:

- a. DEQ advised that the calculations for the individual samples were good but that the summary page seemed to be an average.

6. 2018 Soil Test:

- a. DEQ stated that data from the 2019 and the 2020 tests were more normal.
- b. DEQ stated that due to the location of these irrigation lines in regards to the rivers and creeks there is a lot of attention.

7. Meters for the Irrigation Lines:

- a. City of Clinton has ordered meters for the lines but they have not been delivered yet
- b. City of Clinton is aware they have an I/I issue.

8. Funding:

- a. What are some possible funding sources for these activities
- b. DEQ stated that the City is on the EPA Significant Non-Compliance List (SNC) and will be placed under a Consent Administrative Order (CAO). That will help them with priority for funding.

9. Additional Wells:

- a. City of Clinton asked if they needed additional test wells closer to the creeks.
- b. City of Clinton said that they would add these to the Corrective Action Plan

10. Land Application:

- a. City of Clinton iterated that if the weather does not allowed them to land apply they will need to run the water through the wastewater treatment plant.
- b. None of the testing is done on the river side of the sprayer.
- c. They measured from the sprayer to the creek and if they were too close to the river they would shut off the sprayer
- d. DEQ asked that they mark on a map which ones were shut off and when they were last sprayed.
- e. City of Clinton asked for places that do the hydrological testing. He was told that there are soil scientists and they could contact the University of Arkansas Cooperative Extension Service and ask for Dr. Mike Daniels and see if he can help with that.
- f. City of Clinton stated that they have discussed with the property owner about

changing the spray head from the 360 degree heads to the 180 degree spray heads. These heads have a considerable cost to them.

- g. City of Clinton stated that they do not land apply if there is a 50% chance of precipitation
- h. DEQ advised that the new permit will have stricter requirements on the permit limits for spraying.
- i. He also stated that they should have a soil scientist verify the ground water depth.
- j. DEQ asked what the City would do if land application was not an option and the City of Clinton stated that they would treat the water in the plant and discharge. He said that do this at times throughout the year when they have been unable to land apply.
- k. Jackie said that they have shut down the land application to see how the plant would do. He said that it didn't like the low flow that was coming in so if they have to use the plant more they will need to address these issues. Kyle and Jackie stated that running the plant will raise operating cost. The rates have doubled in the past three years but are still low.

11. Explanations and Wrap Up:

- a. DEQ stated that the permit limit for example is 10,000 for Fecal Coliform Bacteria (FCB), and if that limit were dropped to 2000 there would be cost associated with more wells and testing.
- b. Colby stated that a limit of 10,000 for FCB needs five feet of soil before the ground water to be able to filter out that much FCB. He explained that every foot of soil added 2000 to the count.
- c. City of Clinton will pull sludge samples from the pond to check the cadmium levels.
- d. DEQ asked who pulls the samples. DEQ would prefer that one person was pulling both samples for both labs.
- e. DEQ asked them to pull a third sample and let the DEQ lab test it as well.