

CORRECTIVE ACTION PLAN

CITY OF CLINTON WATER AND SEWER DEPARTMENT

SANITARY SEWER OVERFLOWS

And

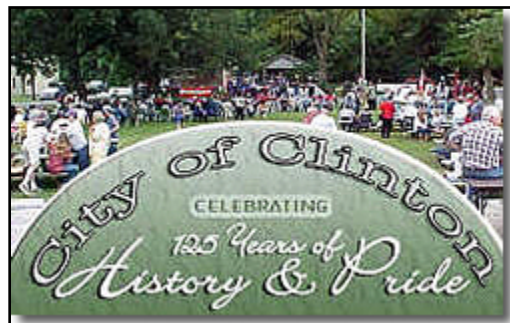
PERMIT VIOLATION

PREPARED FOR:

CITY OF CLINTON WATER AND SEWER DEPARTMENT

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April 17, 2018

Introduction

The City of Clinton Water and Sewer Department received two letters from the Arkansas Department of Environmental Quality (ADEQ) dated March 12, 2018 and March 18, 2018. The letters reference the National Pollutant Discharge Elimination System (NPDES) Permit Number AR0048836 and the Arkansas Facility Identification Number (AFIN) 71-00018 for two violations. The March 12, 2018 letter addressed a Sanitary Sewer Overflow (SSO) on Patton Street. The March 15, 2018 letter addressed a Waste Water Treatment Plant violation of Dissolved Oxygen in December, 2017. The Arkansas Department of Environmental Quality (ADEQ) has requested a Corrective Action Plan (CAP) to address the violations.

Reported Violations

1. The Dissolved Oxygen was reported at 6.2 mg/l per monitoring period end date of 12/31/2017. The permit limit is 7.0 mg/l per part 1, section A.
2. An SSO was reported on Patton Street and Gary Street.

Proposed Action Plan

The following corrective actions are to be implemented in eliminating or reducing the aforementioned violations.

DISSOLVED OXYGEN – The WWTP staff is closely monitoring the D.O. According to the Discharge Monitoring Reports and City of Clinton Water and Sewer staff, this was an isolated incident and has not occurred since the violation. CWB recommends monitoring and observing the DO of the effluent to determine potential issues within the treatment process.

SANITARY SEWER OVERFLOWS – Clinton Water and Sewer experiences Infiltration and Inflow (I/I) into the sanitary sewer collection system during precipitation events. Attached is the Sanitary Sewer Overflow Response Plan (SSORP) for your review. The reported SSO's are a direct result of I/I entering the system, line capacity, and/or sediment deposition. CWB Engineers is tasked with designing an outfall to increase the capacity to eliminate the SSO's on Patton and Gary. An inverted siphon under Town Branch experienced sediment deposition and/or clogged resulting in the SSO on Patton. The inverted siphon under Town Branch was cleaned and free of sedimentation. Clinton Water and Sewer will closely monitor the inverted siphon and clean as necessary to prevent clogging and/or sediment deposition. The SSO on Gary Street is a result of I/I and the lack of capacity of the sanitary sewer main. CWB Engineers is tasked with designing a sanitary sewer main to increase the capacity received at Gary Street. CWB Engineers has tentatively scheduled the design to be completed by May 30, 2018 and construction completed by October 31, 2018. The City Council approved the funding for the Gary Street Sanitary Sewer Relay in Place at their regularly scheduled meeting on April 12, 2018. The City Council approved \$670,000 in

funding for the Gary Street project. The plans and specifications shall be submitted to the Arkansas Department of Health for review and approval.

Conclusion

The Gary Street project will increase the capacity of the collection system. The increase will eliminate the SSO's in this area for a given precipitation event. Also, the new mains and manholes will decrease I/I entering the system. The attached SSORP will provide Clinton Water and Sewer staff in addressing SSO's. CWB Engineers will assist Clinton on maintaining an effective treatment process to meet all permit limits including D.O.