



Leslie Allen-Daniel
Enforcement Coordinator
Arkansas Department of Energy & Environment
Division of Environmental Quality
Office of Water Quality
5301 Northshore Drive
North Little Rock, AR 72118

Re: City of Clinton East WWTP CAP Request
Permit # AR0048836; AFIN: 71-00018

October 29, 2021

Mrs. Allen-Daniel,

The City of Clinton has asked SALT Engineers & Planners, Inc. to draft the Corrective Action Plan (CAP) for the recent request from ADEQ regarding the (11) permit violations from January, 2020 to February, 2021.

The Fecal Coli and E. Coli excursions appear to have been one-off events. The Fecal Coli excursion in April, 2020 was likely caused by algal reduction in transmittance and insufficiently cleaned UV sleeves. The January 2021 E. Coli excursions (Mass & Conc.) were likely caused by insufficiently cleaned UV sleeves. The causative factors contributing to these permit excursions appear to have been resolved and no further corrective actions appear to be necessary at this time.

The Cadmium permit excursions are almost monthly occurrences. There is no obvious source of the Cadmium within the City's sanitary sewage collection system. The City has limited industry and no categorical industrial users. The City has performed Cadmium sampling at a pump station receiving majority industrial flow and the results did not indicate elevated Cadmium. The City has now contracted with FTN Associates, Ltd. to perform ultra-clean sampling for low-level Cadmium and Mercury at selected sites. The sampling is being conducted to ensure that sample contamination has not been a contributing factor to the Cadmium excursions, and that environmental background levels of Cadmium and Mercury are not causal factors to the permit excursions. Low flow samples were collected in September 2021, but the analytical report has not yet been received. High flow samples are scheduled to be collected in Spring of 2022. After those samples are collected, the data will point to one of three scenarios.

Scenario 1:

If the samples reveal that contamination was likely a causal factor during previous sample collection, the proposed corrective action will be to require ultra-clean sampling techniques. Given that the permit renewal occurred July 1, 2019, but was based on 2015 PPS data, and if there is reason to suspect contamination of samples, we would request a new permit renewal cycle to begin. Ultra-clean protocols

would be followed for the renewal PPS. This may result in the removal of Cadmium as a pollutant of concern. The current permit monitoring schedule would continue to be followed (using ultra-clean protocols for low-level metals) until the completion of the permit renewal.

Scenario 2:

If the samples reveal that environmental background levels of Cadmium are the causative factor, then the City would like to discuss the results with the ADEQ. The City should not have to bear the burden of treating non-point source pollution or point source pollution outside of the control of the City.

Scenario 3:

If the samples reveal that the source of Cadmium lies within the City of Clinton’s sanitary sewage collection system, then the City will consider the most economical corrective actions and propose those in a more detailed Cadmium Removal CAP to be submitted as the third Cadmium Progress Report (per Permit requirements) no later than June 30, 2022.

The Corrective Action Milestones are summarized in the table below:

Parameter	Corrective Action	Completion Date
Fecal Coli		Complete
E. Coli		Complete
Cadmium		
Scenario 1	Ultra-clean Sampling Techniques	Immediate upon verification of Scenario 1 – estimated completion by June 30, 2022
Scenario 2	No Action	-
Scenario 3	WWTP Upgrades (Co-precipitation & Filtration, or other treatment system)	June 30, 2025 (See Phases Below)
	Preliminary Design & Detailed Cadmium Removal Corrective Action Plan	June 30, 2022
	Final Design	December 31, 2022
	Regulatory Review	June 30, 2023
	Bidding	September 30, 2023
	Construction	March 31, 2025
	Final Compliance	June 30, 2025

Please contact me at kbreckenridge@saltengineers.com, or 501-766-9832, should you have any questions, or need any additional information.

Sincerely,

SALT Engineers & Planners

Clifton Kyle Breckenridge

C. Kyle Breckenridge, P.E., BCEE

