



June 11, 2014

**CERTIFIED MAIL: 91 7199 9991 7030 4911 0623**

Isaac Keeling  
City of Clinton  
P.O. Box 277  
Clinton, AR 72031

RE: NPDES Permit Number AR0048836, AFIN 71-00018  
NPDES Permit Effluent Violations

Dear Mr. Keeling:

The Department has conducted a file review of the above referenced permit and determined your facility has experienced thirteen (13) effluent violations since April 1, 2011. Of those violations, one (1) was BOD, four (4) were ammonia nitrogen, two (2) were fecal coliform, two (2) were E.coli, one (1) was pH, and three (3) were dissolved oxygen.

I have included a list of effluent violations that have occurred since April 1, 2011. Please review this list and submit a Corrective Action Plan (CAP) detailing the corrective actions that you are taking and/or will take to achieve compliance with the terms of the above referenced permit. Please include a timeline for completion and when facility will achieve compliance with the terms of the above referenced permit. Please submit this CAP to the Department by **June 25, 2014**.

Failure to abide by the effluent limitations set forth in your permit is in violation of Part I, Section A of your permit and may result in enforcement action. Such action will include but may not be limited to the assessment of a voluntary civil penalty.

Thank you for your attention to this matter. Should you have any questions, feel free to call 501-682-0667 or e-mail [bolenbaughm@adeq.state.ar.us](mailto:bolenbaughm@adeq.state.ar.us).

Sincerely,

A handwritten signature in blue ink that reads "Michelle Bolenbaugh". The signature is written in a cursive, flowing style.

Michelle Bolenbaugh  
Enforcement Analyst  
Water Division Enforcement Branch

## DMR Effluent Violations Since 4/2/11

## AR0048836 - CLINTON, CITY OF-EAST WWTF / Major POTW - Effective: 12/1/10

| DMR End Date | Discharge Number | Parameter Description                           | Reported DMR Value | Permit Limit | Vio %  | Violation Type | DMR Value Type Code | Parameter-Mon. Location-Season |
|--------------|------------------|-------------------------------------------------|--------------------|--------------|--------|----------------|---------------------|--------------------------------|
| 07/31/2011   | 001-A            | Coliform, fecal general (30DA GEO, #/100mL)     | 363                | 200          | 82%    | Numeric Vio    | C2                  | 74055-1-0                      |
| 07/31/2011   | 001-A            | BOD, carbonaceous, 05 day, 20 C (MO AVG, mg/L)  | 10.7               | 10           | 7%     | Numeric Vio    | C2                  | 80082-1-0                      |
| 09/30/2011   | 001-A            | Nitrogen, ammonia total [as N] (MO AVG, lb/d)   | <22.2              | 21           | 6%     | Numeric Vio    | Q1                  | 00610-1-0                      |
| 09/30/2011   | 001-A            | Nitrogen, ammonia total [as N] (MO AVG, mg/L)   | <4.45              | 2.1          | 112%   | Numeric Vio    | C2                  | 00610-1-0                      |
| 09/30/2011   | 001-A            | Nitrogen, ammonia total [as N] (7 DA AVG, mg/L) | 5.9                | 5.3          | 11%    | Numeric Vio    | C3                  | 00610-1-0                      |
| 11/30/2011   | 001-A            | pH (MINIMUM, SU)                                | 5.8                | 6            |        | Numeric Vio    | C1                  | 00400-1-0                      |
| 05/31/2012   | 001-A            | Oxygen, dissolved [DO] (INST MIN, mg/L)         | 5.6                | 7            | 20%    | Numeric Vio    | C1                  | 00300-1-0                      |
| 05/31/2012   | 001-A            | E. coli (7 DA AVG, #/100mL)                     | 2540               | 410          | 520%   | Numeric Vio    | C3                  | 51040-1-0                      |
| 05/31/2012   | 001-A            | Coliform, fecal general (7 DA GEO, #/100mL)     | 415                | 400          | 4%     | Numeric Vio    | C3                  | 74055-1-0                      |
| 02/28/2013   | 001-A            | Oxygen, dissolved [DO] (INST MIN, mg/L)         | 6.5                | 7            | 7%     | Numeric Vio    | C1                  | 00300-1-0                      |
| 03/31/2013   | 001-A            | Oxygen, dissolved [DO] (INST MIN, mg/L)         | 6.2                | 7            | 11%    | Numeric Vio    | C1                  | 00300-1-0                      |
| 02/28/2014   | 001-A            | Nitrogen, ammonia total [as N] (MO AVG, lb/d)   | 3303               | 63.1         | 5,135% | Numeric Vio    | Q1                  | 00610-1-1                      |
| 02/28/2014   | 001-A            | E. coli (7 DA AVG, #/100mL)                     | 4153.3             | 2050         | 103%   | Numeric Vio    | C3                  | 51040-1-1                      |

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| Discharge Number | Parameter Description                   | Monitoring Period End Date | Reported DMR Value | Permit Limit | Vio % | Violation Type | DMR Value Type Code | Parameter-Mon. Location-Season | Outfall | Parameter Code |
|------------------|-----------------------------------------|----------------------------|--------------------|--------------|-------|----------------|---------------------|--------------------------------|---------|----------------|
| 001-A            | Oxygen, dissolved [DO] (INST MIN, mg/L) | 05/31/2012                 | 5.6                | 7            | 20%   | Numeric Vio    | C1                  | 00300-1-0                      | 001     | 00300          |
| 001-A            | Oxygen, dissolved [DO] (INST MIN, mg/L) | 02/28/2013                 | 6.5                | 7            | 7%    | Numeric Vio    | C1                  | 00300-1-0                      | 001     |                |
| 001-A            | Oxygen, dissolved [DO] (INST MIN, mg/L) | 03/31/2013                 | 6.2                | 7            | 11%   | Numeric Vio    | C1                  | 00300-1-0                      | 001     |                |
| # of Vios =      | 3                                       |                            |                    |              |       |                |                     |                                |         | 00300          |

| Discharge Number | Parameter Description | Monitoring Period End Date | Reported DMR Value | Permit Limit | Vio % | Violation Type | DMR Value Type Code | Parameter-Mon. Location-Season | Outfall | Parameter Code |
|------------------|-----------------------|----------------------------|--------------------|--------------|-------|----------------|---------------------|--------------------------------|---------|----------------|
| 001-A            | pH (MINIMUM, SU)      | 11/30/2011                 | 5.8                | 6            |       | Numeric Vio    | C1                  | 00400-1-0                      | 001     | 00400          |
| # of Vios =      | 1                     |                            |                    |              |       |                |                     |                                |         | 00400          |

| Discharge Number | Parameter Description                           | Monitoring Period End Date | Reported DMR Value | Permit Limit | Vio %  | Violation Type | DMR Value Type Code | Parameter-Mon. Location-Season | Outfall | Parameter Code |
|------------------|-------------------------------------------------|----------------------------|--------------------|--------------|--------|----------------|---------------------|--------------------------------|---------|----------------|
| 001-A            | Nitrogen, ammonia total [as N] (MO AVG, lb/d)   | 09/30/2011                 | <22.2              | 21           | 6%     | Numeric Vio    | Q1                  | 00610-1-0                      | 001     | 00610          |
| 001-A            | Nitrogen, ammonia total [as N] (MO AVG, mg/L)   | 09/30/2011                 | <4.45              | 2.1          | 112%   | Numeric Vio    | C2                  | 00610-1-0                      | 001     |                |
| 001-A            | Nitrogen, ammonia total [as N] (7 DA AVG, mg/L) | 09/30/2011                 | 5.9                | 5.3          | 11%    | Numeric Vio    | C3                  | 00610-1-0                      | 001     |                |
| 001-A            | Nitrogen, ammonia total [as N] (MO AVG, lb/d)   | 02/28/2014                 | 3303               | 63.1         | 5,135% | Numeric Vio    | Q1                  | 00610-1-1                      | 001     |                |
| # of Vios =      | 4                                               |                            |                    |              |        |                |                     |                                |         | 00610          |

| Discharge Number | Parameter Description       | Monitoring Period End Date | Reported DMR Value | Permit Limit | Vio % | Violation Type | DMR Value Type Code | Parameter-Mon. Location-Season | Outfall | Parameter Code |
|------------------|-----------------------------|----------------------------|--------------------|--------------|-------|----------------|---------------------|--------------------------------|---------|----------------|
| 001-A            | E. coli (7 DA AVG, #/100mL) | 05/31/2012                 | 2540               | 410          | 520%  | Numeric Vio    | C3                  | 51040-1-0                      | 001     | 51040          |
| 001-A            | E. coli (7 DA AVG, #/100mL) | 02/28/2014                 | 4153.3             | 2050         | 103%  | Numeric Vio    | C3                  | 51040-1-1                      | 001     |                |

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| Discharge Number | Parameter Description           | Violation Type | Outfall | Number of DMR Effluent Violations |
|------------------|---------------------------------|----------------|---------|-----------------------------------|
| 001-A            | BOD, carbonaceous, 05 day, 20 C | Numeric Vio    | 001     | 1                                 |
| 001-A            | Coliform, fecal general         | Numeric Vio    |         | 2                                 |
| 001-A            | E. coli                         | Numeric Vio    |         | 2                                 |
| 001-A            | Nitrogen, ammonia total [as N]  | Numeric Vio    |         | 4                                 |
| 001-A            | Oxygen, dissolved [DO]          | Numeric Vio    |         | 3                                 |
| 001-A            | pH                              | Numeric Vio    |         | 1                                 |
|                  |                                 |                | 001     | 13                                |
|                  |                                 |                | Sum:    | 13                                |