DEPARTMENT OF NATURAL RESOURCES

GOVERNOR KIM REYNOLDS
LT. GOVERNOR ADAM GREGG
DIRECTOR CHUCK GIPP

November 15, 2017

Bob Milroy, Superintendent
Clinton Water Pollution Control Facility
1901 Beaver Channel Parkway
Clinton, IA 52732

Letter of Non-Compliance: Wastewater Bypass - Notification, 567 IAC 63.6(3)

SUBJECT: Wastewater bypass - FODB Complaint #24896
Facility No. 6-2326001

Mr. Milroy:

On November 1, 2017, this office received an anonymous complaint alleging the city of Clinton discharged partially treated wastewater from the main wastewater plant onto plant grounds between October 21st and 22nd.

I sent you and email on November 9, 2017 requesting additional information on the alleged incident. In subsequent phone conversations and email correspondence, you reported that on October 22, 2017, a power outage at the Clinton wastewater facility resulted in water running out from underneath the doors of the effluent pump station and onto the grassy area around the building and down into the lower area behind the building. You stated the water was fully treated effluent and did not leave treatment plant property. You stated you did not report the event to the department because you believed the water was treated effluent and was the same water that would have been discharged to the river and would not have been considered a bypass.

A bypass is defined (in part) in Chapter 567 IAC 60 as "the diversion of waste streams from any portion of a treatment facility or collection system". Although treated effluent, the discharge from the effluent pumping station would be considered a "diversion" from normal operating procedures and discharged from location other than what is authorized by the city's NPDES permit. As such, the event identified above would technically be considered a bypass. Please update any protocols and/or procedures the city may have regarding by-pass reporting and ensure appropriate staff are aware of these technical requirements.

Please contact me if you have questions or I can be of additional assistance.

Sincerely,
FIELD SERVICES & COMPLIANCE BUREAU

Terry Jones
Environmental Specialist Senior

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xc: DNR Records Section, DNR, Des Moines
Clinton WWTP File