



June 18, 2020

Ms. Danielle Harbin, Enforcement Analyst
Arkansas Division of Environmental Quality (DEQ)
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Mena Water Utilities
NPDES Permit Number: AR0036692, AFIN-57-00423, CAO LIS 18-046
Explanation of Permit Exceedances

Dear Ms. Harbin:

A permit exceedance for Total Residual Chlorine (TRC) was recorded at the City of Mena's WWTP during the month of May 2020. A permit exceedance for Fecal Coliform Bacteria (FCB) was also recorded at the WWTP during the month of June 2020. A copy of the laboratory results related to the TRC exceedance is enclosed with this letter. Laboratory results related to the FCB exceedance will be provided by the City separate from this notification.

Mena's treatment process currently does not include a means of dechlorinating to control TRC. As referenced in the City of Mena's Quarterly Progress Report #2 submitted to DEQ on April 15, 2020, the City is currently taking steps toward achieving compliance with TRC limits. The City submitted a Request for Temporary Variance to DEQ on June 11, 2020 to allow a 90-day full-scale trial evaluation utilizing peracetic acid (PAA) disinfection. The City is scheduling to begin this evaluation in August 2020. This start date should allow the City to achieve compliance with the TRC limit required by Part I, Section B of their permit prior to September 1, 2020. The FCB excursion resulted from an adjustment in the WWTP's chlorine feed rate in an attempt to avoid additional TRC exceedances. This operational challenge will incidentally also be addressed through the PAA disinfection trial evaluation.

Respectfully Submitted,

HAWKINS-WEIR ENGINEERS, INC.


Adrian J. Kaufman, P.E.

AJK/oab
Enclosures: TRC Laboratory Results – May 2020

cc: Mr. Charles Pitman, Mena Water Utilities General Manager
Mr. Mike Spencer, Mena Water Utilities Wastewater Superintendent

Environmental Services Company, Inc.

Corporate Office
13715 West Markham
Little Rock, AR 72211
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Northwest Arkansas Branch
1107 Century Avenue
Springdale, AR 72762
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Control Number: 2005010378
Customer Name : MENA WASTEWATER TREATMENT PLANT
Customer/Permit No. : 4479 / AR0036692
Report Date : 06/12/20

Composite Date:05/27/20 -05/28/20
Sample Time : 0808-0808/1050(5-28)
Sample Type : COMP/GRAB WWATER
Sample From : FINAL EFFLUENT

Collected By: JGK
Delivery By : JGK
Work Order :
Purchase Order :

Laboratory Analysis

Analysis							Quality Assurance	
Date	Time	By	Parameter	Result	Notes	Quantity	Precision % RPD	Accuracy % Recovery
05/28	1055	JGK	Dissolved Oxygen	8.40 mg/L			0.00	N/A
06/01	1230	DWC	Ammonia as N, (HACH/SM)	0.18 mg/L			1.86	109.0 *
05/28	1055	JGK	pH	7.5 S.U.			0.00	N/A
06/01	0645	ATL	Solids, Total Suspended	< 5.00 mg/L			0.00	N/A *
05/28	1520	JK	Fecal Coliform	39.3 /100ml			12.72	N/A
05/28	1055	JGK	Chlorine, Residual	0.100 mg/L	(b)		0.00	N/A
05/29	0650	DWC	BOD, Carbonaceous	< 2.00 mg/L			0.00	96.3 *

* QA data shown is from a different sample or standard on the same date.


(b) Exceeds Permit Limits for Maximum Concentration

All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature


Environmental Services Co., Inc.

UPW



CHAIN OF CUSTODY

ATC