

Engineering Client Success

November 13, 2019

Ms. Bailey Taylor, Enforcement Analyst Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

Re:

NPDES Permit Number: AR0036692, AFIN-57-00423

Explanation of Permit Exceedance

Dear Ms. Taylor:

Permit exceedances for Total Suspended Solids (TSS), pH, and Total Residual Chlorine (TRC) were recorded at the Mena Wastewater Treatment Plant (WWTP) during the month of October 2019. TSS exceedances were the direct result of excessive algal growth within the WWTP's lagoons. All effluent was filtered prior to discharge but the abnormally high solids loading rate resulting from the excess algae limited the filtration's effectiveness. The cause of the recorded pH exceedance is unknown but is thought to potentially be a result of an increased addition of coagulant used in the filtration process. Mena's treatment process currently does not include a means of dechlorinating to control TRC.

Hawkins-Weir Engineers, Inc. (HWEI) recently submitted a Wastewater Treatment Master Plan to DEQ on behalf of the City of Mena per the terms of their CAO (CAO LIS 18-046). The City is in the process of identifying funding sources for the construction of a new activated sludge wastewater treatment facility that will not be subject to the risk of TSS violations due to algal blooms. The new facility is also anticipated to include a higher level of control and monitoring to avoid potential pH violations resulting from chemicals used in the treatment process. Construction of the new WWTP is scheduled to be complete by November 2023.

As referenced in a progress report emailed to DEQ on October 7, 2019, the City is currently taking steps toward the installation of a Sodium Thiosulphate chemical feed system at their existing treatment facility to quench residual chlorine. HWEI is currently designing this system and the Construction Permit Application for these improvements is scheduled to be submitted to DEQ in December 2019. Construction of these interim TRC improvements is scheduled to be complete by August 2020.

Respectfully Submitted,

HAWKINS-WEIR ENGINEERS, INC.

Adrian J. Kautman, P.E

AJK/kad

Mr. Charles Pitman, Mena Water Utilities General Manager

Mr. Mike Spencer, Mena Water Utilities Wastewater Superintendent

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Sanuary Sewer Overflow Monthly Report

E-Equipment Failure Facility Name: Mena Water HC-Hydro Clean CO-Construction R-Rainfall RO-Roots Location Signature of Cognizant or Ranking Official Cause(s) of SSO "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." my RG-Roots & Grease Failure/Break V-Vandalism D-Debris LF-Line G-Grease Manhole# 2000 Start Date of 14.14.05 Permit Number: A Poo 366 92 Reporting Period (Month/Year): Oct NEAH-No Evidence of Adverse Health or Environmental No Sanitary Sewer Overflows This Monitoring Period OBHC-Observed or Byidence of Human Contact BFK-Byidence of Fish Kill End Date of OSS SSO Impact Summary Report Code Descriptions Estimated Volume (in gallons) Cause of SSO EC-Environmental Cleanup HC-Hydro Cleaned EN-Referred to Engineering PN-Public Notification WO-Work Order Action(s) Taken HR-Hand Rodded Environmental Impact 11 Action (s) Taken to Address SSO 19 CR-Creek/Stream/River (please specify) Ultimate Discharge Location PA-Paved Area CB-Contained in Building GR-Ground Surface DR-Drop Inlet DI-Ditch Ultimate Discharge Location