



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. Kaufman, P.E.

AJK/kad

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

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