



August 13, 2020

EMAIL

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

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

Dear Ms. Harbin:

This letter is intended to provide notification of permit exceedances that were recorded at the City of Mena's Wastewater Treatment Plant (WWTP) during the month of July 2020. Permit exceedances and their associated sampling dates are provided below.

<u>Sampling Date</u>	<u>Constituents Out of Compliance</u>
July 1, 2020	Total Residual Chlorine (TRC)
July 8, 2020	TRC
July 15, 2020	TRC
July 22, 2020	Dissolved Oxygen (DO) and pH
Week of July 27, 2020	Total Suspended Solids (TSS)

As mentioned previously, Mena's treatment process currently does not include a means of dechlorinating to control TRC. The City commenced a full-scale peracetic acid (PAA) disinfection trial evaluation on July 30, 2020. Through this trial, the City intends to evaluate PAA as a long-term solution to achieving consistent compliance with their TRC limits. The cause of the recorded DO, pH, and TSS exceedances are unknown. However, the City indicated that the pH exceedance may have resulted from a higher than normal Alum dosing in their filters. The TSS exceedance is thought to be a result of winds across the lagoons creating an accumulation of solids near the Lagoon #2 effluent structure that ultimately entered the effluent. All effluent was filtered prior to discharge, but it is suspected that the abnormally high solids loading rate associated with this accumulation limited the effectiveness of the WWTP's filtration system. Laboratory results related to these exceedances will be provided by the City separate from this notification.



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As referenced in the City's Effluent Limits Compliance Quarterly Progress Report No. 3 submitted to the Division of Environmental Quality on July 15, 2020, the City is currently taking steps toward constructing a new activated sludge wastewater treatment facility. This new facility is expected to provide more operational flexibility and be less susceptible to the permit excursions occurring at the City's existing facility. Hawkins-Weir Engineers recently completed a Site Selection Study to identify a location for the new WWTP and the City is currently negotiating the purchase of the recommended site. Construction of the new WWTP is scheduled to be complete by November 2023.

Respectfully Submitted,

HAWKINS-WEIR ENGINEERS, INC.


Adrian J. Kaufman, P.E.

AJK/oab

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