

SETH SMITH
Mayor

LINDA REXROAD
City Clerk/Treasurer

PATRICK C. McDANIEL
City Attorney



CITY OF MENA
September 9, 2020
320 Mena Street
Mena, AR 71953

COUNCIL
Andy Brown
Dwight Douglas
Ed Gibson
Mary Alice Head
Terri Neugent
James Earl Turner

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

Re: NPDES Permit Number: AR0036692, AFIN-57-00423
Proposed Consent Administrative Order Second Amendment, CAO LIS 18-046

Dear Ms. Harbin:

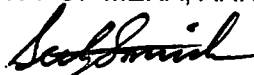
The City of Mena respectfully disagrees that a second amendment to CAO LIS 18-046 is necessary as a result of Total Residual Chlorine (TRC) violations or anticipated permit non-compliance for that constituent. Recent TRC violations are now believed to be the result of testing error. Mena has also eliminated the use of chlorine at its wastewater treatment plant. The City has taken the necessary steps to comply with its permit limitations for TRC by September 1, 2020 as required.

The City of Mena contracted its wastewater testing services to Environmental Services Company, Inc. (ESC) of Little Rock, AR during the period identified in the CAO "Findings of Fact" section. When a TRC violation was recorded by ESC during a period of time that chlorine was not in use at the WWTP, we questioned the testing methods employed by that company. After a series of discussions, ESC conceded that the instrument being used for the testing might be inappropriate for our application. ESC has not recorded a measurable TRC residual in our plant's effluent since switching to an alternate approved meter (EXTECH CL200). As a result, we have reason to believe that each of the permit exceedances documented in the proposed CAO amendment were in error.

The City began a pilot study of peracetic acid (PAA) at our WWTP on July 30, 2020. Pending a successful pilot, it is our intention to utilize PAA as the sole disinfectant until the WWTP is removed from service in the near future. The use of PAA in lieu of de-chlorination will reduce required capital investment in a facility scheduled for closure and ensure permit compliance for TRC. Since the City of Mena has taken the steps necessary for TRC compliance by September 1, 2020, we respectfully request that the second amendment proposed for CAO LIS 18-046 be withdrawn.

Sincerely,

CITY OF MENA, ARKANSAS


Seth Smith, Mayor

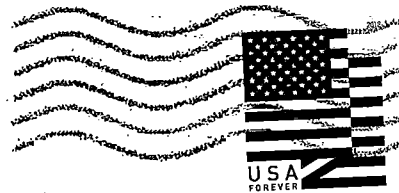
cc: Mr. Charles Pitman, Mena Water Utilities General Manager
Mr. Aaron M. Benzing, P.E., Hawkins-Weir Engineers, Inc.

City of Mena

520 Mena Street
Mena, Arkansas 71953

LITTLE ROCK AR 722

10 SEP 2020 13:49 L



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

72118-531789

