



**Miller-Newell
Engineers, Inc.**

Albert H. Miller, P.E. (1932-2001)

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April 12, 2022

Alan J. York, Associate Director
Office of Water Quality
Division of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Permit AR0045225 AFIN 34-00061
Permit Compliance Schedule

Dear Sir:

We are writing to report on the concerns about Total Residual Chlorine (TRC) and Total Phosphorus (TP) at the above referenced plant.

- 1) Total Residual Chlorine: The Wastewater Department Manager reports that only intermittent discharge occurs from this plant. The City tests in their laboratory the water to be discharged and only releases water within permit limits. The bulk of the flow is pumped to the Newport Main Wastewater Treatment Plant for processing and discharge. The Manager reports that no chlorine is used at the referenced plant. This being the case he questioned the testing laboratory. They reported that they use the DPD method of test. Apparently this test is not accurate for pond water. The standard method of tests specified in Section of ASTM 1253-14 is not subject to commonly encountered interferences and is applicable to most waters. The laboratory reports that they only have the DPD test method and now have removed some of the interferences. The interferences cause the test to show a reading for TRC in water that has no chlorine. The City wishes to continue with the laboratory for convenience. The City herewith asks the Department to regard the chlorine readings as false readings since no chlorine is used at this plant.
- 2) The Manager reports that all tests for Total Phosphorous have been within limits except four (4) which were reported as follows:

DMR Date	TP Concentration (male)
November 2018	0.32
January 2020	20.71
October 2020	0.55
November 2020	1.64

Permit limit is 0.1 mg/l. The Manager again reports that discharge from this plant is intermittent with the majority of flow being pumped to the Newport Main Plant.

Before any action is taken he requests that he be allowed to monitor the results for four additional testing events since testing is infrequent. This will give a more current picture of the discharge. As indicated in the draft permit, phosphorous is added at the discharge from the Shearer Snack Food Plant. In recent months the quantity of phosphorous has been reduced. The City will make further adjustments to bring phosphorus back into compliance.

Your review and concurrence in this approach will be appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert W. Chatman", followed by a horizontal line extending to the right.

Robert W. Chatman, P.E.

cc: Martin Steward