

June 10, 2014

Mr. David Dorris Ash Grove Cement Company 4457 Hwy 108 West Foreman, AR 71836

RE: Compliance Inspection (Little River Co)

AFIN: 41-00001 NPDES Permit No.: AR0042846 AFIN: 41-00230 NPDES Permit No.: ARR001101

Dear Mr. Dorris:

On May 12, 2014, I performed routine compliance inspections of the above referenced permits in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. These inspections revealed the following violations:

AR0042846

- 1. The name and address of the Contract Laboratory is not being included on the DMRs. See Part III, C, 5 of the permit.
- 2. The facility does not have a licensed operator on staff. See Part II, 1 of the permit.
- 3. Duplicate pH and DO analyses are not being analyzed. See Part III, C, 3 of the permit.

ARR001101

No violations noted during inspection.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Inspection Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to Water-Inspection-report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by June 24, 2014.

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If I can be of any assistance, please contact me at (870) 777-7585 ext. 2 or smithron@adeq.state.ar.us.

Sincerely,

Red Smith

District 10 Field Inspector

Water Division

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⇒ EPA							Form Approved OMB No. 2040-0003						
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY													
NPDES Compliance Inspection Report													
		<u> </u>	<u> </u>										
	T				Section A	A: Nation	nal Dat	a Sy	estem Coding				
1	N 2 5 3 A R 0 0 4 2 8 4 6 11 12 1 4 0 5 1 2 17 1									1ns 18	pec. Type Inspector Fac. Type C 19 S 20 2		
							Remarks	8					
	Inspection Work Days 67 69								-Reserved				
					S	Section 1	B: Facil	ity	Data				
incl	ne and Location of Facility Inspected sude POTW name and NPDES permit Grove Cement Company			al users disc	charging i	to POTV	V, also		Entry Time/Date 1020 / 5-12-2014		Permit Effective Date June 1, 2012		
2.5	miles southwest of Foreman on Hw	y 108	8						Exit Time/Date 1530 / 5-12-2014		Permit Expiration Date May 31, 2017		
	ne(s) of On-Site Representative(s)/Ti th Byrely / Environmental Manage				mber(s)						ner Facility Data		
Nan	ne, Address of Responsible Official/	Title/	Phone an	d Fax Num	ber						nor Industrial		
Dav	rid Dorris / Plant Manager / 870-54 7 Hwy 108 West								Contacted	PD	PDS# 078193		
	eman, AR 71836								Yes No				
			(S =						rring Inspection sfactory, N = Not Evaluated)				
S	Permit	S		Measureme		U Op			perations & Maintenance		Sampling		
M	Records/Reports	S	Self-M	Ionitoring l	Program		N	Slu	ıdge Handling/Disposal		S Pollution Prevention		
S	Facility Site Review	N	Comp	liance Sche	edules		N	Pre	treatment	N	Multimedia		
S	Effluent/Receiving Waters	U	Labor	atory			S	Sto	rm Water	S	Other: Effluent Limits		
		Se	ection D:	Summary	of Findin	ngs/Com	ments	(Atı	ach additional sheets if necessar	y)			
	Violations:												
	 (1) The name of the Contract Laboratory is not being included on the DMRs. (2) The facility does not have a licensed operator as required. 												
	(3) The facility is not duplicating pH and DO analyses.												
(c) ==== ===============================													
Name(s) and Signature(s) of Inspector(s) Agency/Office/Telephone/Fax Date													
ARI				AR De	AR Dept. of Environmental Quality-Hope								
8/0-/						70-777-7585 ext. 2 / 870-777-7560(Fax)				May 14, 2015			
Kerri Mc Coly					-	Office/Phone and Fax Numbers NLR / 501-682-0642			Date June 9, 2014				
Ker	erri McCabe												

ADEQ Water NPDES Inspection	AFIN: 41-00001	Permit #: AR0042846

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑Y □N □NA □NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	□y □n ☑na □ne
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☑Y □N □NA □NE
4. ALL DISCHARGES ARE PERMITTED:	☑y □n □na □ne
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	□S ☑M □U □NA □NE
DETAILS: Contract lab name is not included on the DMRs	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y □N □NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	⊠s □m □u □na □ne
a. DATES AND TIME(S) OF SAMPLING:	☑Y □N □NA □NE
b. EXACT LOCATION(S) OF SAMPLING:	Øy □n □na □ne
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☑y □n □na □ne
d. ANALYTICAL METHODS AND TECHNIQUES:	☑y □n □na □ne
e. RESULTS OF CALIBRATIONS:	□y Øn □na □ne
f. RESULTS OF ANALYSES:	☑y □n □na □ne
g. DATES AND TIMES OF ANALYSES:	☑y □n □na □ne
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☑Y □N □NA □NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	ØS □M □U □NA □NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	⊠s □m □u □na □ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	☑Y □N □NA □NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	□S □M ☑U □NA □NE
DETAILS: Facility does not have a licensed operator	
1. TREATMENT UNITS PROPERLY OPERATED:	⊠s □m □u □na □ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	⊠s □m □u □na □ne
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	□s □m □u ☑na □ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	□s □m □u ☑na □ne
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	☑s ☐m ☐u ☐na ☐ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	□s □m ☑u □na □ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	□S □M □U ☑NA □NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	☑Y □N □NA □NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☑Y □N □NA □NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	☑Y □N □NA □NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	□y Øn □na □ne
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	□y □n ☑na □ne
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	□y □n ☑na □ne
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	□y ☑n □na □ne
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□Y □N ☑NA □NE

ADEQ Water NPDES Inspection	AFIN: 41-00001	Permit #: AR0042846

SI	SECTION D: SAMPLING						
PE	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE					
DE	ETAILS:	1					
1.	SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y □N □NA □NE					
2.	LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	⊠y □n □na □ne					
3.	FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	□y □n ☑na □ne					
4.	SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y □N □NA □NE					
5.	SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y □N □NA □NE					
6.	SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y □N □NA □NE					
a	a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y □N □NA □NE					
t	D. PROPER PRESERVATION TECHNIQUES USED:	⊠y □n □na □ne					
-	c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y □N □NA □NE					
7.	IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	□Y □N ☑NA □NE					
SI	ECTION E: FLOW MEASUREMENT						
	ERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE					
	ETAILS:						
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:	⊠y □n □na □ne					
2.	TYPE OF DEVICE: Different sized pipes at the different outfalls. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y □N □NA □NE					
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	DY ON MA ONE					
4.	CALIBRATION FREQUENCY ADEQUATE:	DY ON MINA ONE					
5.	RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	OY ON MINA ONE					
-		OY ON MINA ONE					
6.	CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:						
7.	FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	Øy □N □NA □NE					
8.	FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	Øy □N □NA □NE					
9.	HEAD MEASURED AT PROPER LOCATION:	☑Y □N □NA □NE					
CI	ECTION F: LABORATORY						
		☐S ☐M ☑U ☐NA ☐NE					
	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	LIS LIM MO LINA LINE					
	ETAILS: No duplicates being analyzed for pH & DO analyses EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES):						
1.		MY ON ONA ONE					
2.	IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	OY ON ONA ONE					
3.	SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	ØY □N □NA □NE					
4.	QUALITY CONTROL PROCEDURES ADEQUATE:	ØY □N □NA □NE					
5.	DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	OY ON ONA ONE					
6.	SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	Øy □n □na □ne					
7.	COMMERCIAL LABORATORY USED:	☑Y □N □NA □NE					
	a. LAB NAME: Arkansas Analytical.						
	D. LAB ADDRESS: 13715 West Markham Little Rock, AR 72215						
<u> </u>	PARAMETERS PERFORMED: TSS, Fecal coliform, BOD BIOMONITORING PROCEDURES ADEQUATE:						
8.	BIOMONITORING PROCEDURES ADEQUATE:	OY ON MA ONE					
	a. PROPER ORGANISMS USED:	OY ON MA ONE					
-	D. PROPER DILUTION SERIES FOLLOWED:	OY ON MA ONE					
-	2. PROPER TEST METHODS AND DURATION:	OY ON MA ONE					
	d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	□Y □N ØNA □NE					
l							

ADEQ Water NPDES Inspection	AFIN: 41-00001	Permit #: AR0042846

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS											
BASED ON	/ U U	□NA □NE									
DETAILS:											
OUTFALL #:	OUTFALL #: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM FLOATING SOLIDS COL										
001 None		None	None			None		None			
002	None	None	None	None	None	None		None			
003	None	None	None	None	None	None		None			
SECTION H: SLUDGE DISPOSAL											
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS											
DETAILS:				. •	_						
	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			□s	□м□	JU □NA ØNE			
2. SLUDGE R	ECORDS MAINTAINED	D AS REQUIRED BY 40) CFR 503:				IS DM DU DNA DNE				
3. FOR LAND	APPLIED SLUDGE, TY	YPE OF LAND APPLIE	TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):						
			<u> </u>		·						
SECTION	I: SAMPLIN	G INSPECTION	N PROCEDI	JRES							
SAMPLE F	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			⁄ □υ	☑NA □NE			
DETAILS:					1						
1. SAMPLES	OBTAINED THIS INSPI	ECTION:					□Y €	ĬN □NA □NE			
2. TYPE OF S	SAMPLE: GRAB:	COMPOSITE:_ N	METHOD: FREQUE	NCY:							
3. SAMPLES											
4. FLOW PRO											
5. SAMPLE O											
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				□Y □	IN ⊠NA □NE			
7. SAMPLE S	PLIT WITH PERMITTEI	E:					□Y [IN ⊠NA □NE			
8. CHAIN-OF-	8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:										
9. SAMPLES	9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:										
SECTION	J: STORM V	NATER POLL	.UTION PRE	/ENTION PL/	AN						
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS			⁄I □U	☑NA □NE			
DETAILS:	See inspection	for ARR001101	dated 5-12-201	<u> 4</u>							
1. SWPPP UF	PDATED AS NEEDED:	_ DATE OF LAST UP	DATE:					IN ⊠NA □NE			
2. SITE MAP	2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:							IN ⊠NA □NE			
3. POLLUTIO	B. POLLUTION PREVENTION TEAM IDENTIFIED:										
4. POLLUTIO	POLLUTION PREVENTION TEAM PROPERLY TRAINED:										
5. LIST OF POTENTIAL POLLUTANT SOURCES:								IN ⊠NA □NE			
6. LIST OF PO											
7. ALL NON-S	7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:										
8. LIST OF ST											
9. LIST OF NO	ON-STRUCTURAL BMF	PS:						IN ⊠NA □NE			
10. BMPS PRO	PERLY OPERATED A	ND MAINTAINED:						IN ⊠NA □NE			
11. INSPECTIO	11. INSPECTIONS CONDUCTED AS REQUIRED:										

DMR Calculation Check

Reporting Period: From 13 10 01 To 13 10 31

Year Month Day Year Month Day

TSS Outfall Parameter Checked: 001

Loading Concentration
Mass Monthly
Mo. Avg. - lbs/day Mo. Avg. - mg/l 7-day Avg. - mg/l

Reported Value: 5.0

Calculated Value: 5.0

Permit Value: 50

If calculated value does not equal reported value, explain: Same

ASH GROVE CEMENT COMPANY

4343 HIGHWAY 108 FOREMAN, ARKANSAS 71836 Phone (870) 542-3010 Fax (870) 542-3026

DAVID DORRIS Plant Manager

May 21, 2012

Water Division Inspection Branch Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

Subject:

Ash Grove Cement Company

NPDES Permit No. AR0042846 AFIN: 41-00001

Compliance Inspection Corrective Action

Dear Mr. Smith:

In response to your letter of June 10, 2014 concerning violations of the permit, Ash Grove is committed to corrective action to gain compliance. The following actions are being taken as part of that corrective action.

The name and address of the Contract Laboratory is being included in all DMRs in compliance with Part III, C, 5 of the permit

Keith Byerly is scheduled to take the Class I Waste Water Operator test on July 8. Charles Beauvais is scheduled to take the Basic Industrial License course in July to be in compliance with Part II, 1 of the permit.

Duplicate pH and DO analysis are being done on outfall testing per Part III, C 3 of the permit.

If you have any questions please contact Mr. Keith Byerly at (870) 542-3017.

Sincerely:

David Dorris

cc: Keith Byerly, Ash Grove

Red Smith, ADEQ

From: <u>Keith Byerly</u>

To: <u>Water-Inspection-Report</u>; <u>Smith, Ronald</u>

Cc: Keith Byerly

Subject: NPDES Permit No. AR0042846 Compliance Inspection Corrective Action

Date: Wednesday, June 25, 2014 3:03:06 PM
Attachments: 2014 0625 FM NPDES Corrective Action Ltrl.pdf

Attached is a letter of corrective actions taken in response to a May 12, 2014 inspection by Mr Smith. If you have any questions please let me know.

An email was sent earlier in the day. Please disregard as it had an incorrect date. Thank you

--

Keith Byerly Environmental Manager Ash Grove Cement company

Ph: 870-542-3017

ASH GROVE CEMENT COMPANY

4343 HIGHWAY 108 FOREMAN, ARKANSAS 71836 Phone (870) 542-3010 Fax (870) 542-3026

DAVID DORRIS Plant Manager

June 25, 2014

Water Division Inspection Branch Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

Subject:

Ash Grove Cement Company

NPDES Permit No. AR0042846 AFIN: 41-00001

Compliance Inspection Corrective Action

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If you have any questions please contact Mr. Keith Byerly at (870) 542-3017.

Sincerely:

David Dorris

cc: Keith Byerly, Ash Grove

Red Smith, ADEQ



July 10, 2014

Mr. David Dorris Ash Grove Cement Company 4457 Hwy 108 West Foreman, AR 71836

RE: Response to Inspection (Little River Co)

AFIN: 41-00001 NPDES Permit No.: AR0042846

Dear Mr. Dorris:

I have reviewed the response pertaining to my May 12, 2014 inspection of the Ash Grove Cement Company. The information provided sufficiently addresses the violations referenced in my inspection report. At this time, the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at (870) 777-7585 ext. 2 or smithron@adeq.state.ar.us.

Sincerely,

Red Smith

District 7 Field Inspector

Ry Sith

Water Division