



A CRH COMPANY

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Submitted to [ssoadeq@adeq.state.ar.us](mailto:ssoadeq@adeq.state.ar.us)

October 02, 2020

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

**Re: NPDES Non-Compliance Reports**  
**AFIN: 41-00001**  
**Permit Number: AR0042846**

Dear Sir or Madam,

Ash Grove Cement Company (Ash Grove) operates a cement kiln in Foreman, Arkansas with a NPDES permit (permit number: AR0042846). The NPDES permit requires monthly sampling of Ash Grove's three NPDES outfalls for various parameters. During a sampling event completed on September 24<sup>th</sup>, one non-compliance was noted. It was Fecal Coliform Bacteria colonies greater than the daily maximum limit of 2,000 colonies/100 mL.

On September 30<sup>th</sup>, 2020, Ash Grove contacted DEQ concerning the Fecal Coliform exceedance to complete the 24-hour reporting requirements. This report is to fulfill the requirements listed in Ash Grove's NPDES permit Part III Section D.6 for following-up within 5 days of making a 24-hour report.

**Outfall 003 Fecal Coliform Monthly Average and Daily Maximum:** On September 24<sup>th</sup>, a Fecal Coliform sample was taken from Outfall 003 at approximately 8:12 A.M. Results from that sample were received on September 29<sup>th</sup> at 1:30 P.M. These results had a value of >2,400 colonies/100 mL. This is above the daily maximum limit listed in Ash Grove's NPDES permit. Ash Grove completed 24-hour reporting by contacted DEQ via email on September 30<sup>th</sup>, at 1:08 P.M.

Ash Grove believes that this is a continuation from the August 2020 Fecal Coliform Monthly Average and Daily Maximum non-compliance submitted on August DMRs and in a five-day report mailed to DEQ on September 3<sup>rd</sup>. In the last five-day report submitted on September 23<sup>rd</sup>, 2020, Ash Grove stated that the issues with its sewer system had been corrected. Upon further internal investigation, it appears that the issue was not corrected like originally thought. Due to the findings of this investigation, Ash Grove has increased its inspections of its sewer system from monthly to biweekly. In addition, Ash Grove conducted an internally review of its drainage system for Outfall 003 to identify other potential sources that could cause elevated fecal levels, and Ash Grove has added one other potential source identified to its biweekly inspection.

In addition, Ash Grove will reach out to either FTN Associates or GBMc & Associates for guidance on how to treat the pond that feeds Outfall 003 and to identify measures to put in place to prevent future exceedances.

Please contact me at 870-542-3030 or [ted.jennings@ashgrove.com](mailto:ted.jennings@ashgrove.com) if there any questions.

Sincerely,



Ted Jennings  
Plant Manager  
Ash Grove Cement Company

cc: Craig McMahon  
Matthew Brooks  
Aaron Spicer