



A CRH COMPANY

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Ted Jennings
Plant Manager

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Submitted to ssoadeq@adeq.state.ar.us

September 23rd, 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 the September sampling event completed on September 8th, one non-compliance was noted. It was Fecal Coliform Bacteria colonies greater than the monthly average of 1,000 colonies/100 mL and the daily maximum limit of 2,000 colonies/100 mL.

On September 8th, 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 8th, a Fecal Coliform sample was taken from Outfall 003 at approximately 9:05 A.M. Results from that sample were received on September 18th at 12:00 P.M. These results had a value of >2,400 colonies/100 mL. This is above both the monthly average and daily maximum limits listed in Ash Grove's NPDES permit. Ash Grove completed 24-hour reporting by contacted DEQ via email on September 18th, at 3:47 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 3rd. An excerpt from that report is provided below:

Upon investigation, it was determined that the most likely cause was from the plant's sewer system. The maintenance department puts chlorine tablets into the sewer system on a regular basis to control bacteria. However, due to a recent schedule change to accommodate COVID-19 and employee segregation, it appears responsibilities were confused and missed. Upon this realization after an investigation on September 2nd, the maintenance department put chlorine tablets into the sewer system and inspected the sewer system to correct the problem. In addition, a reoccurring work order will be setup to prevent future incidents. The outfall will be resampled sometime during the week of September 8th-10th to confirm that this corrected the violation.

While Ash Grove has corrected its issues with its sewer system, since the September sampling event conducted on September 8th has shown that the Fecal Coliform levels are still high, Ash Grove will reach out for advice to see what measures can be taken to reduce the Fecal Coliform levels as soon as possible.

Please contact me at 870-542-3030 or ted.jennings@ashgrove.com if there any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ted Jennings', is written over a light blue rectangular background.

Ted Jennings
Plant Manager
Ash Grove Cement Company

cc: Craig McMahon
Matthew Brooks
Aaron Spicer