



A CRH COMPANY

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Submitted to 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 24th, 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 30th, 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.

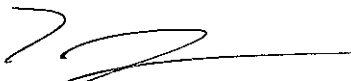
Outfall 003 Fecal Coliform Monthly Average and Daily Maximum: On September 24th, a Fecal Coliform sample was taken from Outfall 003 at approximately 8:12 A.M. Results from that sample were received on September 29th at 1:30 P.M. These results had a value of >2,400 colonies/100 mL. This is above the daily maximum limit listed in Ash Grove's NPDES permit. Ash Grove completed 24-hour reporting by contacted DEQ via email on September 30th, 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 3rd. In the last five-day report submitted on September 23rd, 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 if there any questions.

Sincerely,



Ted Jennings
Plant Manager
Ash Grove Cement Company

cc: Craig McMahon
Matthew Brooks
Aaron Spicer