



A CRH COMPANY

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Submitted to ssoadeq@adeq.state.ar.us

October 27, 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, a Division of CRH (Ash Grove) operates a cement kiln in Foreman, Arkansas, with an NPDES permit (permit number: AR0042846). The permit requires both a 24-hour, and a 5-day report when results exceed the limits. On October 23, 2020, Ash Grove made the 24-hour report. The information herein completes the 5-day report (See permit Part III Section D.6).

The permit requires monthly outfall data on Fecal Coliform Bacteria colonies. On October 22, a sample event found results greater than the daily maximum limit of 2,000 colonies/100 mL.

**Outfall 003 Fecal Coliform Monthly Average and Daily Maximum:** On October 22, the company collected a Fecal Coliform sample at Outfall 003 at approximately 9:35 A.M. The company received the results on October 23 at 3:46 P.M. The fecal coliform value was 4,800 colonies/100 mL, which is above the permit's daily maximum limit. Ash Grove reported to DEQ on October 23, at 4:22 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>. Since that time, Ash Grove has completed an internal audit to determine all potential sources of Fecal Coliform into Outfall 003, implemented a scheduled biweekly inspection of

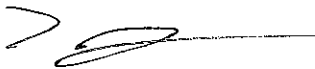
two known sources of fecal coliform identified in the internal audit, performed repair work on both of the sources of fecal coliform to ensure they are working properly, and brought in GBMc & Associates to perform a site assessment. Ash Grove is awaiting the final report from that site assessment and expects it to be issued sometime this week.

The initial indications are that a failure to complete the packaging plant's routine maintenance occurred because of shift changes and "Social Distancing" because of COVID-19. The company corrected the setup, but the first release's impact is taking time to work through the system. The Process Pond, which all Fecal Coliform sources that have the ability to directly impact water quality in the plant drain into before exiting through Outfall 003, is more on the scale of a small lake at approximately 50 acres and has taken time to drop the loading.

The most recent results show that the corrective actions taken by Ash Grove are bringing the level down. Ash Grove will continue to monitor the situation and see if there are any ways to decrease the Fecal Coliform levels faster.

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 McMahan  
Matthew Brooks  
Aaron Spicer