

# ASH GROVE CEMENT COMPANY

4457 HIGHWAY 108  
FOREMAN, ARKANSAS 71836  
PHONE 870 / 542-6217, ext. 3270  
FAX 870 / 542-7091  
TELEFAX 870 / 774-8828

DAN PETERSON  
PLANT MANAGER

September 26, 2006

No \_\_\_\_\_  
Log  
9.29.06

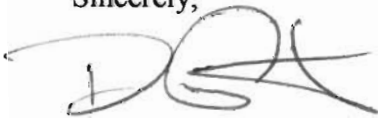
FedEx: 8545 5284 6018  
Martin Maner, P.E.  
Chief, Water Division  
Arkansas Department of Environmental Quality  
8001 National Drive  
Little rock, AR 72209

Subject: **COMMENTS ON DRAFT NPDES PERMIT No. AR0042846**  
**Ash Grove Cement Company**  
**Foreman, Arkansas**

Dear Mr. Maner,

Enclosed are comments on the Draft NPDES Permit No. AR0042846 published September 14, 2001 in the Little River News. Specifically, the comments are on two new conditions (Numbers 2 and 3) on Page 1 of Part III. A written response to the comments is requested.

Sincerely,



Dan Peterson

Cc: FL Streitman  
ES Pierce  
DM Sweeney  
KW Byerly  
Amanda Gallagher - ADEQ

Enclosure



MEMBER  
PORTLAND CEMENT ASSOCIATION



**Comments on Draft NPDES Permit 0042846**  
**Ash Grove Cement Company**  
**September 25, 2006**

The draft permit changes the existing permit by adding two new conditions (fecal coliform and temperature monitoring) for outfall 003 on Page 3 of Part IA.

**Fecal coliform**

The statement of basis 12 B. page 8 and page 3 of Part IA of the Permit – Fecal coliform bacteria limits are proposed on Outfall 003 citing Regulation No. 2.507 which sets forth standards for primary and secondary contact waters.

**Comment**

The receiving stream for Outfall 003 is an unnamed tributary to French Creek. The unnamed tributary and French Creek are both intermittent and, therefore, are not a primary nor secondary contact waters during the May 1 to September 1 time period.

Effluent from the Process water Pond via Outfall 003 includes a discharge from the sewage treatment lagoon. This discharge is for approximately 190 people in three shifts. 190 employees X 50gpd are 9,500gpd. The Process Water Pond is approximately 38.1 acres in size and averages six feet deep which provides a volume of 74,593,963 gallons. Therefore the wastewater discharge has a minimum detention time of 7,851 days. This allows for sufficient time to have die off of any residual fecal coliform.

For these reasons, Ash Grove request that the requirement to monitor fecal coliform be removed from the permit.

**Surface Water Temperature**

The statement of basis 12 B. Page 8 and Page 3 of Part IA of the permit – Temperature monitoring and reporting is proposed by ADEQ to be included in the draft permit as a monitoring requirement of Outfall 003. The rationale is given as the maximum regulated surface water temperature in the Gulf Coastal Plains Eco-region is 86 degrees Fahrenheit.

**Comment**

The temperature in the Process Water Pond and other nearby water bodies is ambient. During the summer months these water bodies exceed the proposed 86 degrees Fahrenheit maximum regulated surface water temperature. Outfall 003 does not routinely discharge during periods of dry weather and, therefore, neither the maximum nor 5 degree increment is threatened in the intermittent receiving stream.

For these reasons, Ash Grove request that the requirement to monitor and report temperature be deleted from the permit.