

ADEQ

ARKANSAS
Department of Environmental Quality

December 15, 2010

Keith Byerly, Environmental Manager
Ash Grove Cement Company
4343 Highway 108 West
Foreman, AR 71836

RE: pH adjustment proposal at Internal Outfall 03A
NPDES Permit No. AR0042846; AFIN: 41-00001

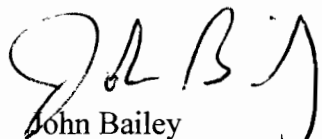
Dear Mr. Byerly:

This letter is in response to your letter dated 11/15/2010, concerning your proposal to control pH levels in the landfill sedimentation pond which captures runoff from the cement kiln dust (CKD) landfill. This pond discharges through Internal Outfall 03A to the process water pond. The current permit contains pH limits of 6.0-9.0 s.u. applicable to the discharge from Internal Outfall 03A. As stated in your letter, the CKD generated from the new pre-calcining kiln has a higher free lime content than the old wet process CKD, which causes higher pH values in the runoff from the CKD landfill collected by the landfill sedimentation pond. You have proposed to lower the pH in this pond to comply with the permitted pH limits by the addition of dry ice (carbon dioxide) during times when it becomes apparent that a discharge from the landfill sedimentation pond is imminent. The amount of carbon dioxide to be added would be dependent on the amount of pH adjustment needed.

The Department has reviewed your proposal and has determined that a permit modification is not necessary for the addition of carbon dioxide to the landfill sedimentation pond. This approval letter is issued in reliance upon the statements and representations made in your letter and does not guarantee satisfactory operation of the treatment system.

Should you have any further questions, please contact Shane Byrum at (501) 682-0618 or by email at byrum@adeq.state.ar.us.

Sincerely,



John Bailey
Permits Branch Manager
Water Division

Eric Fleming, Inspection Branch Manager