

Tanya Ester (adpce.ad)

From: Water Permit Application
To: Pennye Bray
Subject: RE: Draft Permit Comments

From: Pennye Bray [mailto:PBray@eccci.com]
Sent: Wednesday, March 13, 2024 10:56 AM
To: Water Permit Application <Water-Permit-Application@adeq.state.ar.us>
Cc: Alex Mathis <james.mathis@ashgrove.com>
Subject: Draft Permit Comments

To Whom it May concern

Attached you will find comments submitted on behalf of Ash Grove Cement Company Draft NPDES Permit AR0042846. Thank You.

*Pennye L. Bray, REM, REPA
Environmental Director, Water
ECCI
13000 Cantrell Road
Little Rock, AR 72223
(501) 975-8100 - Phone
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March 6, 2024

Guy Lester, P.E.
Division of Environmental Quality
Office of Water Quality
NPDES Permits Section
5301 Northshore Drive
North Little Rock, Arkansas 72118

RE: Permit AR0042846 Draft Comments

Dear Mr. Lester,

On behalf of Ash Grove Cement in Foreman, Arkansas, I would like to offer the following comments on the draft of NPDES Permit AR0042846.

1. The facility requests that the flow measurement within Part 1, Section 1A and Section 2A be reduced to no more than twice monthly. There is no regulatory basis for the significant increase in the flow measurement frequency from once per month to eight times per month. The application of the increased frequency of eight times per month is based on an “in-house” memo of recommended (not required) monitoring frequencies. There is no regulation nor law applicable to this facility that requires monitoring of flow at this frequency. Additionally, monitoring the flow from the facility eight times per month provides no real benefit to the environment and places a significant burden on the facility staff in terms of time and effort required to collect these samples. Outfall 003 is located approximately 3.0 miles from the Plant and Outfall 002 is located a little more than one mile from the Plant requiring quite a bit of time from facility staff to access these areas outside their normal daily duties. It is Ashgrove’s position that measuring the flow twice per month will provide an adequate representation of the facility discharge rates from the outfalls.
2. Facility environmental personnel currently hold a Basic and Advanced Industrial Wastewater Operator’s License. We request an extension in the schedule of compliance of six months to one year to meet the requirements for a Municipal Class II License due to the amount of training required to obtain this license.

Thank you for your consideration of these comments. Feel free to contact me at pbray@ecci.com or Alex Mathis, Ash Grove Environmental Engineer at james.mathis@ashgrove.com with questions.

Sincerely,



Penny L. Bray, REM, REPA
ECCI Environmental Director, Water