

From: Jezebele Alicea <Alicea.Jezebele@epamail.epa.gov>
Sent: Thursday, April 26, 2012 9:12 AM
To: Byrum, Shane
Subject: Re: Part 411 applicability question

Hi Shane,

I called earlier today to provide you with a response to your question about Part 411 Subpart A applicability. I'll be in meetings the rest of the day, so let me just follow up with this email.

Subpart A does not apply to the non-contact cooling water wastestream. ELGs apply just to process wastewaters that are in direct contact with raw materials, manufacturing or cleaning processes, so it does not apply to the cooling water wastestream. However, local permit writers have the authority to implement their best professional judgement (BPJ) to dischargers. Therefore, based on your opinion, even though Part 411 does not apply to the type of discharge described you can determine BPJ using the ELGs as reference to limit the temperature of the cooling water wastestream.

Please feel free to contact me if you have further questions.

Sincerely,

Jezebele Alicea-Virella

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▼ "Byrum, Shane" ---04/23/2012 06:14:26 PM---Hi Jezebele, I am a permit engineer working on an NPDES permit renewal for Ash Grove Cement in Forem

From: "Byrum, Shane" <BYRUM@adeq.state.ar.us>
To: Jezebele Alicea/DC/USEPA/US@EPA
Date: 04/23/2012 06:14 PM
Subject: Part 411 applicability question

Hi Jezebele,

I am a permit engineer working on an NPDES permit renewal for Ash Grove Cement in Foreman, AR. Prior to 2010 the facility produced Portland cement by the wet process. Now they produce all cement by the dry process and they have cyclones and baghouses for air emissions control of the kiln dust. They do not have any wet scrubbers. The only wastestream from their cement manufacturing process is non-contact cooling water which is withdrawn from their large process water pond and discharged back into this pond in a recirculating type water flow.

I am trying to determine if Subpart A is applicable to this non-contact cooling water wastestream. I think that the non-contact cooling wastestream is subject to Subpart A because the ELG contains a temperature rise limitation. The fact that the ELG contains a temperature rise limit implies that cooling water wastestreams (both contact and non-contact) are subject to the ELG, not just process wastewater, in my opinion. Also, on page 31 of the development document it discusses that "cooling water is the largest volume of water used in cement plants and that this water is mostly uncontaminated" and ... "the change usually noted is an increase in temperature".

If you can confirm if my determination is correct, I would appreciate it because they have submitted comments on the draft stating that they don't believe they are subject to Subpart A.

Shane Byrum
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