

ASH GROVE CEMENT COMPANY

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April 20, 2012

CAREY AUSTELL
PLANT MANAGER

Mr. Shane Byrum
Staff Engineer
Discharge Permits Section, Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72218-5317

Subject: Comments on Draft Permit
 Ash Grove Cement Company
 NPDES No. AR 0042846
 AFIN: 41- 00001

Dear Mr. Byrum;

Thanks for meeting with Ash Grove representatives on October 18, 2010 to discuss the draft permit. We are submitting our comments in two parts; first the question of the applicable regulations, and secondly to clarify appropriate sources of wastewater listed in the draft permit.

40 CFR Subparts A and C

Ash Grove appreciates the opportunity to provide these comments on the referenced draft NPDES permit. As was noted in discussions held with Mr. Keith Byerly, Environmental Manager and Dr. Bob Blanz, our engineering consultant, during your site visit in October 2011, Ash Grove has never been subject to 40 CFR 411 Subpart A which contains production based effluent limits for Total Suspended Solids (TSS) nor the technology-based limits on allowable temperature rise and does not feel that it is applicable now.

Since we had not been subject to the TSS mass limit in the past, the wastewater flow diagram submitted with the application was little changed from previous renewal applications. We have attached a revised Wastewater Flow Diagram that more clearly depicts the water flow used at the facility. Clearly, the vast majority of the water balance deals with runoff from materials storage piles runoff for which only 40 CFR 411 Subpart C is applicable. This circumstance was noted in Section IV of the ELG (page 30) as the reason for the establishment of the Subpart C subcategory:

".....not all plants in the industry are able to completely prevent runoff discharges and none could be expected to contain all the runoff from the piles during abnormal rainfall events and cataclysmic climate conditions. Therefore, it becomes necessary to further subcategorize the

industry for the purpose of identifying the appropriate control technologies and to establish pollutant discharge limitations for materials storage piles runoff which are practicable and economically achievable."

Similar to the TSS issue, the 3° F temperature rise in Subpart A may not be applicable to this facility either, as the cooling water is drawn from depth at the north end of the Process Water Pond and discharged at the south end through Outfall 003 at the surface. Summer heating will likely affect the surface temperature readings at the Outfall. The distance from the pumps to the outfall is approximately 2600 feet.

As you know Ash Grove has recently replaced the old production process, termed a "wet process" with a dry pre-calciner pyroprocess. As can be seen on the attached schematic, the only "process water" that is re-circulated through the "Process Water Pond" (Outfall 003) is the non-contact cooling water from Cement Mills #2, and #4. Mill # 4 only operates when a production surge exceeds the capacity of Mill # 1. Mill # 2 is only operated an average of 5-7 days per month to manufacture Masonry Cement. Mills # 2 and # 4 rarely operate at the same time (due to power demands). Since the non-contact cooling water is re-circulated, Ash Grove does not believe that it is picking up contaminants that are being released to the environment as was contemplated in the January 1974 Effluent Limitations Guideline (ELG), i.e. there is no net increase in loading of TSS. The vast majority of source water to Outfall 003 is runoff from material storage piles.

Ash Grove has no capability to control the discharge from Outfall 003 and, therefore, even with low TSS concentrations, no way to control the mass amount of TSS in the effluent following a precipitation event. Additionally, the discharge of TSS from Outfall 003 is in no way related to the facility's production rate. Historically, the TSS concentration in Outfall 003 has been generally in the single digits to mid teens (5-15 mg/L), and, therefore, does not cause or contribute to water quality violations in the Gulf Coastal Plain eco-region.

Further, since the only process water going into Outfall 003 is re-circulated non-contact cooling water with low TSS, Ash Grove believes that it complies with the intent of both the ELG for Cement Manufacturing and the Minerals and Mining ELG (40 CFR 436.52, Subpart E) both of which require no discharge of process generated waste water into navigable waters, and that the only applicable requirement is 40 CFR 411, Subpart C, Materials Storage Piles Runoff Subcategory.

In summary, the only operation possibly subject to Subpart A is the recirculation of non-contact cooling water from the Process Water Pond for cooling Cement Mills # 2 and #4. As stated above, these mills are operated intermittently and there is no net increase in TSS loading from their operations and no relationship to production rates. Additionally the ELG clearly sets forth the reasons for establishing the Subpart C subcategory as cited above.

When examined in detail, Ash Grove believes that 40 CFR 411 Subpart A has never been and is not now applicable to the facility and request that it been stricken from the permit and the requirements for 40 CFR 411 Subpart C reinstated.

Wastewater Sources

As was discussed on the 18th, the Statement of Basis and the permit contain wastewater source, "Chalk Dryer Wet Scrubber Discharge" that is no longer in service. It was removed with the new plant construction. On the Public Notice Page, the Statement of Basis, Section 10 C. and in the draft permit Page 3 of Part IA all list "chalk dryer wet scrubber discharge", and "truck washout water" as sources in Outfall 003. The only "truck wash water" would be generated at the maintenance shed area where it goes through a settling pit and oil/water separator before being discharged to the "Blue Hole". The attached Wastewater Flow Diagram revision, mentioned above, reflects this change.

Sincerely;

A handwritten signature in black ink that reads "Carey Austell". The signature is written in a cursive style with a large, sweeping initial 'C'.

Carey Austell
Plant Manager

EPA Form 2D.III.B
 Wastewater Flow Diagram Rev 1
 Ash Grove Cement
 AR0042846

