

December 15, 2023

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 Pre-draft

Dear Mr. Lester,

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

1. The facility requests that the flow measurement requirement stay at one per month like the previous permit. A change from one measurement per month to eight measurements per month is an extreme change that places an undue burden on facility personnel with no real benefit to water quality of the receiving stream.
2. What is the justification for changing the licensing requirements from a Class I license to a Municipal Class II license when there have been no changes to the wastewater treatment?

Thank you for your consideration of these comments. Feel free to contact me with questions.

Sincerely,



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





**Archived:** Tuesday, December 19, 2023 10:59:30 AM

**From:** Guy Lester (adpce.ad)

**Sent:** Tuesday, December 19, 2023 8:29:00 AM

**To:** 'Penny Bray'

**Cc:** Alex Mathis; Jessica Sears (adpce.ad)

**Subject:** RE: Ash Grove Cement - AR0042846

**Importance:** Normal

**Attachments:**

2 -AR0042846\_Operator License Class II\_20221025.pdf - Recommended Monitoring Frequencies for NPDES Permits\_20230731.pdf

Penny:

Concerning the comments on the pre-draft permit:

1. The OWQ issued a guidance document on sampling types and frequencies to make monitoring in NPDES permits more consistent. See Attachment 1.
2. The Operator Class is based on the requirements of ADPC&E Rule 3.502 (which is applicable for sewage treatment whether or not the facility is municipal). The license requirement in the previous permit was incorrect. See Attachment 2.

Guy Lester, P.E. | Permit Engineer

Division of Environmental Quality | Office of Water Quality

NPDES Permits Section

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**ARKANSAS**  
ENERGY & ENVIRONMENT

**From:** Penny Bray <PBray@ecc1.com>

**Sent:** Monday, December 18, 2023 3:30 PM

**To:** Guy Lester (adpce.ad) <Guy.Lester@adeq.state.ar.us>

**Cc:** Alex Mathis <james.mathis@ashgrove.com>

**Subject:** Ash Grove Cement - AR0042846

Guy,

Attached you will find comments on the Ash Grove Cement "pre-draft" NPDES Permit submitted on behalf of Ash Grove Cement. Please feel free to contact me or Alex Mathis, Ash Grove Environmental Engineer, [james.mathis@ashgrove.com](mailto:james.mathis@ashgrove.com) should you have any questions. Thank You!

Penny

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