

**RESPONSE TO COMMENTS
FINAL PERMITTING DECISION**

Response to comments received on the subject draft permit in accordance with regulations promulgated at 40 CFR Part 124.17 are as follows:

Permit No.: AR0042846
Applicant: Ash Grove Cement
Prepared by: Amanda Gallagher
Public Notice Date: The draft permit was publicly noticed on June 15, 2008.
Date Prepared: 07/18/2008

The following comments have been received on the draft permit:

Letter from Dan Peterson, Ash Grove Cement, to Amanda Gallagher, ADEQ dated 07/14/2008.

ISSUE #1

Foreman is misspelled in the location description on the cover page as follows: "...is authorized to discharge from a facility located as follows: 4457 Highway 108 West, Forman, AR 71836."

RESPONSE #1

The error has been corrected.

ISSUE #2

The Statement of Basis does not provide any justification for the addition of Dissolved Oxygen. The permittee believes that the monitoring requirements established for Outfall 003B are protective of water quality and the inclusion of the additional requirements for DO at Outfall 003 is not necessary. The permittee wants the Department to provide justification of the inclusion of the monitor and report requirements for Dissolved Oxygen at Outfall 003.

RESPONSE #2

Page 8 of the Statement of Basis provides an explanation for the monitoring requirements for Dissolved Oxygen for Outfall 003 and for all requirements for Internal Outfall 03B. Outfall 03B is an internal outfall. The monitoring requirements for this outfall are not based on water quality standards. The intent for Internal Outfall 03B and its requirements is to ensure that the package plant associated with the internal outfall operates properly. Internal outfalls are allowed per 40 CFR 122.45(h).

Permit limitations and conditions associated with External Outfall 003 must be protective of water quality and thus the reasoning why Dissolved Oxygen monitoring requirements were added to Outfall 003. The monitoring and reporting requirements for Dissolved Oxygen at External Outfall 003 are based on Section 2.505 of APCEC Regulation No. 2.