ASH GROVE CEMENT COMPANY

"WESTERN REGION"

June 21, 1996

Fred Austin,
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500 Seattle, WA. 98101-2038

Re: Penalty Nos. 8291, 8311, 8355

Dear Mr. Austin:

In accordance with the Assurance of Discontinuance for the above, I have enclosed with this letter a revision to our current Operating and Maintenance Plan which adds preventative maintenance of the projects listed in paragraph 1 of the AOD including inspection and cleaning of the new enclosures.

Yours truly,

Gerald J. Brown
Manager Safety and Environment

Copy: Henrik Voldbaek
Nate Fernow
Carey Austell
Doug Hale

626906

AGCS2M001307

3801 EAST MARGINAL WAY, SOUTH • SEATTLE, WA 98134 • PLANT OFFICE: (206) 623-5596 • FAX: (206) 623-5355

ASH GROVE CEMENT SEATTLE LAB
UNKNOWN RAW MATERIALS REPORT

PATRICK NOON CHIEF CHEMIST
PJN

July 25, 1995

SAMPLING INFORMATION
1149-95 APPROXIMATELY 70 GRAM SAMPLE FROM HASBRO PORT OF SEATTLE.
LOADING DOCK ROAD SOUTH WEST OF WALLBETWEEN STALL #22 & #23.
Sample received from Nate Fernow, Jerry Brown
COLOR: Light gray color material.

1150-95 APPROXIMATELY 70 GRAM SAMPLE FROM HASBRO PORT OF SEATTLE.
LOADING DOCK OFF DOCK SURFACE NORTH END OF NEAR DOCK #30.
COLOR: Light gray color material resembles common dirt or soil.
Sample received from Nate Fernow, Jerry Brown

METHOD XRF FUSION SODIUM TETRABORATE
POWDER PRESS XRF FOR ALKALIS

SAMPLE #	1149-95	1150-95	TYPICAL CLINKER CHEMISTRY
DATE RECEIVED	July 21, 1995	July 21, 1995	
DATE SAMPLED	July 21, 1995	July 21, 1995	
CHEMICAL ANALYSIS			
SIO2	50.33	41.38	22
AL2O3	10.52	9.19	5
FE2O3	5.59	5.98	3.4
CAO	5.14	14.12	65
MGO	1.25	0.85	3
SO3	1.17	1.22	0.7
LOSS ON IGNITION	21.35	23.50	0.2
ALKALIS			
NA2O	2.19	1.73	0.4
K2O	1.03	0.695	0.3
TOTAL	98.57	98.67	
INSOLUBLE	59.47	46.08	0.2
Free Lime Test	Negative	Negative	POSITIVE @1.0

CONCLUSIONS
Chemically this material has the composition of natural dirt or clay.
The high insoluble values are indicative of a material that has not been processed through a high tenperature environment.

RECEIVED
DEC 28 1995
AGCW-SEATTLE

interoffice
MEMORANDUM

to: WHS
copy: KJR, DYH, Henrik Voldbaek, Gerald J. Brown
from: Hans E. Steuch HES
subject: Port of Seattle Dust Fallout Complaints
date: December 20, 1995

A meeting was held with PSAPCA on December 19th. The list of participants is attached. Ash Grove had asked for the meeting to discuss PSAPCA's dissatisfaction with the company's apparent lack of commitment to move toward addressing the subject matter.

Svend Eriksen from Heller, Ehrman described what has happened until now. He explained the uncertainties involved in finding and controlling the Ash Grove contribution to the dust nuisance. He stated that although the company was committed to work in the desired direction, it would be unrealistic to expect the result to be elimination of nuisance complaints by next summer.

Mr. Nolan remarked that PSAPCA is looking for commitment from Ash Grove to act on the recommendations expected to come forth from the McCulley Frick and Gillmann study. He emphasized that he prefers a "partnering" approach to solving the dust problem rather than a confrontational approach. Nolan was particularly pleased to hear that all plant personnel were being involved in finding solutions since, in his mind, that of all approaches has the best chance of providing the desirable results.

WHS assured everyone that the desired Ash Grove commitment exists. Dave Kirchner passed around pictures taken this past year of dust on cars and dust falling from a clinker conveyor belt. KJR reviewed the history of the tenant/Port of Seattle and Ash Grove relationship. Lorrie Halberstam explained that PSAPCA is looking for Ash Grove to sign an agreement that commits the company to a process for working on the dust problem.

The meeting concluded with PSAPCA offering to draft the core of such an agreement, which will be submitted to Ash Grove in early January. Ash Grove and Heller Ehrman are to review and augment the agreement and return it.

It appears that the plant already has ideas about how to address some of the potential sources of dust (employing "air-knife" on discharge pulley of clinker belt to prevent dust carryover, enclosing belt conveyor take up stations). These ideas should be implemented as soon as possible.

The McCulley Frick and Gillmann study is expected to result in a report in late January, which will form the basis for further action, whether studies or remedies.

Ash Grove - PSAPCA Meeting

December 19, 1995

Name	Affiliation	Phone
Dave Kircher	PSAPCA	(206) 689-4050
Hans Steuch	Ash Grove	(503) 293 2333
KEN RONE	ASH GROVE	" " "
Bill Siemering	"	" " "
NATHAN FEIRIVOW	ASH GROVE	(206) 623-5596
HENRIK VOLDBAEK	ASH GROVE	(206) 623-5596
Jim Nolan	PSAPCA	(206) 689-4053
Laurie Halvorson	PSAPCA	(206) 689-4030
Svend Einhsen	Heller Ehrman	

AGCS2M001310

PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

November 30, 1995

Gerald J. Brown
Manager, Safety and Environment
Ash Grove Cement Company
3801 East Marginal Way, South
Seattle, WA 98134

Dear Mr. Brown:

Fallout Complaints - Terminal 106

Thank you for attending our meeting on November 21, 1995 concerning resolution of fallout complaints in the vicinity of Terminal 106. The purpose of this letter is to provide you and the other attendees with a summary of the action items agreed to during the meeting.

PSAPCA agreed to provide a complaint log to Ash Grove, which is enclosed, listing the times and dates of each fallout complaint we have received, to assist you with the identification of sources of the fallout. In addition, our inspectors will contact you by phone when we receive future complaints.

Ash Grove agreed to provide to PSAPCA, by December 1, 1995, a schedule for the completion of work by its consultant to characterize transport mechanisms for the fallout and identify potential sources of fugitive emissions. We also understand that Ash Grove plans to meet with the Port and the complainants to discuss temporary measures to address these complaints.

I look forward to working with you to implement effective, timely solutions to these fallout complaints. If you have any questions, please call me at (206) 689-4050.

Sincerely,

David S. Kircher

David S. Kircher
Manager – Engineering

Enclosure

DSK:lh

cc: H. Voldbaek, Ash Grove Cement Company
R. Hinrichs, Stoneway Concrete
K. Benham, Port of Seattle
J. Willenberg, F. Austin, E. Gilpin, M. McAfee, R. Busterna, A. Gaffke, PSAPCA

Dennis J. McLerran, Air Pollution Control Officer
BOARD OF DIRECTORS
Chairman: Win Granlund, Commissioner, Kitsap County
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett
Lynn S. Horton, Mayor, Bremerton
R.C. Johnson, Councilman, Snohomish County
Gary Locke, King County Executive
Harold G. Moss, Mayor, Tacoma
Norman B. Rice, Mayor, Seattle
Doug Sutherland, Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038 ▲ (206) 343-8800 ▲ (800) 552-3565 ▲ FAX:(206)343-7522
printed on recycled paper