

Henderson, Katie

From: Gilliam, Allen
Sent: Wednesday, February 18, 2009 11:15 AM
To: 'lryan@southernaluminum.com'
Cc: magnolia russell thomas; Fuller, Kim; Henderson, Katie
Subject: Southern Aluminum (ARP001059) Pretreatment reporting requirements

NPDES PERMIT FILE
 NPDES # AR0043613
 AFIN # 14-00059
 Permit PN
 ✓ Correspondence
 Technical Backup
 2/18/09 Date Scanned

Leon,

Please find attached the first report required under the national pretreatment regulations located in 40 CFR 403.12(b), the Baseline Monitoring Report (BMR). Please fill this form out and return it to this office at your earliest convenience, copying Russell Thomas with the city. Please be as accurate as possible with the schematic of your process layout with as much identifying information as possible regarding floor drains, chemical storage areas, workpiece "flow", and delineation of regulated vs. non-regulated flowlines (boiler blowdown, non-contact cooling water, sanitary sewer, etc).

Also, please provide a comprehensive narrative description of the regulated operation (Fe phosphatizing/rinse) with measured (if feasible) or verifiable flow measurements (a "5 gallon bucket test" with a stopwatch is acceptable) of discharge and whether it's batch or continuously discharged.

As previously discussed, your operations' wastewater is subject to EPA's effluent guidelines under 40 CFR 433.17. In our brief discussions back in December, you mentioned that the only process wastewater is coming from your 2 stage phosphatizing line/rinse. That would fall under the core operation of phosphatizing (coating) in 40 CFR 433. If you have a water curtain behind your spray painting operations, that would be considered regulated also as an ancillary waste stream. If you have negative air filtration, this obviously may not be applicable.

You should immediately contact a certified lab who can set you up with the proper containers for the metals and total toxic organics (TTO) and send the results with your BMR, if timing coincides. ADEQ's certified labs can be found at <http://www.adeg.state.ar.us/techsvs/labcert.asp>, just choose the state and a list will appear which you may choose from for bids, if you wish.

The second report will due 90 days after submittal of the BMR and basically be a summary of the analytical results of your samples. From that date forward, your reports to this office (cc-ing the City) will be due in June and December. The second attachment ("CIU_SAR") will suffice for that report and the 90 day report mentioned above also. In fact, your "90 day" report may very well coincide with June.

The ARP001059 tracking number has been assigned to Southern Aluminum and should be "Re:" (referenced) on any future correspondence as well as Magnolia's NPDES permit number of AR0043613.

Please be aware that your facility may be subject to NPDES Stormwater permitting requirements. Please contact Jennifer Harmon @ 501.682.0627 to obtain the appropriate information regarding stormwater permitting requirements.

Please review your other reporting requirements in 40 CFR 403.12: change in process, notification requirements of accidental slug discharges, etc.

If you have any questions filling this form out, please feel free to contact this office @ 501.682.0625.

Sincerely,

Allen Gilliam

ADEQ State Pretreatment Coordinator / 5301 Northshore Drive / N. Little Rock, AR 72118

cc: e-drive/pretreatment reports

2/18/2009

FINAL BASELINE MONITORING REPORT

FOR A

40CFR433 CATEGORICAL INDUSTRY

90 Day Compliance Report per §403.12(d)

Instructions: In accordance with 40CFR403.12(b) & (d) Industrial Users subject to categorical Pretreatment Standards are required to submit to ADEQ a report which contains the information in paragraphs (b)(1)-(7). Use of this form is not an EPA requirement. The User is responsible for submitting a complete and accurate report. Nonetheless, the User may complete this form in as much detail as possible. Include additional information on attached sheets as necessary where space is limited.

Return to: Water Div/NPDES Pretreatment

(1) User Identifying Information [§403.12(b)(1)]:

A. Legal Name: _____

Mailing Address: _____

_____ Zip: _____

B. Facility Name: _____

Location: _____

_____ Zip: _____

C. Name of Owners: _____

D. Name of Operators: _____

E. Facility Contact (Provide the name, title & phone number of a designated person to contact if additional information is necessary):

F. Number of Employees _____ G. Number of Shifts _____

H. Number of Months per Calendar Year which Plant normally operates _____

I. Publicly Owned Treatment Works (POTW) (Provide the name of the sewerage authority, municipality, etc. that receives the wastewater discharges from this facility--If this facility is not connected to a sewerage system describe where wastewater is discharged)

J. Provide the date the facility began regulated discharge to the POTW (sewerage authority, municipality, etc.)

Date facility installed/commence construction of 40CFR433 Core operation(s) _____

(2) User's Permits [§403.12(b)(2)]:

Describe all environmental control permits held by or for the facility

Describe Title of the Permit	Permit No.	Issuing Office	Exp. Date

(3) Description of User Operations [§403.12(b)(3)]:

A. List Raw Material/Basis Metals Used:

B. List Toxic Organics (TTO) & alloy metals and their source (Name of Chemical/Basis Metal):

C. Describe Manufacturing or Service Activities Conducted and the Final Products: _____

D. Summarize each Point Source Category (This form is for only the Metal Finishing Category):

Source Category	
Source Category	
Source Category	

3.D (Con'd) Summarize each Core process [Electroplating, Electroless Plating, Anodizing, Coating (chromating, phosphating & coloring), Chemical Etching & Milling or Printed Circuit Board Manufacture]:

Process Description*	Pretreatment Standard Category	Subpart	SIC Code	Date Process was Installed
	40CFR433	A		

*Process Description must be exactly as shown in the applicable 40CFR SubPart; for example, 40CFR433 SubPart A lists "Electroplating", "Electroless Plating", "Anodizing", "Coating", "Chemical Etching and Milling" and "Printed Circuit Board Manufacture".

E. Provide on a separate sheet(s):

- (i) A schematic drawing/chart of manufactured parts flow through each regulated process that generates wastewater--optional for users with only concentration-based standards.
- (ii) A schematic drawing showing all wastewater flows (regulated and unregulated), location of any treatment system, and sampling locations and flows for each individual wastestream. Show points of discharge to the POTW from regulated processes (blank schematic enclosed).

(4) User Flow Measurement [§403.12(b)(4)]:

A. Total Plant Flow in Gallons per Day (gpd):

Average _____ Maximum _____

B. Individual Process Flows in Gallons per Day¹ (gpd)

¹Referring to 40CFR403.6(e)(1) average flows must be for a 30-day period. Batch discharges which are less frequent than monthly should be normalized to a 365-day period.

STREAMS ² include non-contact cooling water, sanitary waste, etc.	Average Flow Rate (gpd)	Max. Flow Rate (gpd)	Type Discharge ³
Regulated Streams			
Unregulated Streams			
Dilute Streams			
Non-Contact Cooling Water			
Sanitary Wastewater			

² Regulated processes have wastestreams regulated by federal standards.
Unregulated processes have wastestreams (which are not regulated by federal standards) with federally regulated parameters.
Nonregulated processes have unregulated and/or dilute wastestreams.

³ Show type; for example--Continuous, Batch (Monthly, Semi-annually, etc), Intermittent (5 days/week, 25 days/30-day period, etc.)

(5) Measurement of Pollutants in User's Discharge to POTW [§§403.6(a) & 403.12(5)]:

A. (i) Cite Evidence Why Subpart A (40CFR433) is applicable to each Core process⁴:

Core Process _____

Core Process _____

Core Process _____

(ii) Provide on a separate sheet a description of all wastewater treatment utilized (show treatment system location in relation to process flows and sampling points on schematic drawing required in Section 3.E above).

B. Analysis of Regulated Flows: The industrial user must perform sampling and analysis of the effluent from all regulated processes which discharge into the POTW (after treatment, if applicable). Provide the analytical data for the regulated processes in the appropriate space below.

CONCENTRATIONS (mg/l)									
Basis	Pollutant								
	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO
Maximum									
Average									

C. Analysis of Total Plant Flow (Mark each blank "N/A" if not appropriate/applicable)

In accordance with 40CFR403.6(e) an industrial user may sample and analyze the total plant flow and calculate an alternate concentration limit using the combined wastestream formula if regulated process flows are mixed with other flows prior to treatment and/or sampling. Record the analytical results for all regulated pollutants below. Record the calculated concentration limits as well as the actual measured concentrations.

⁴§403.6(a)(2)(ii)--Optional for Existing Sources and for New Sources which have requested certification.

CONCENTRATIONS (mg/l)									
Basis ⁵ AMAC --- Actual Measured Average Concentration from Lab results	Pollutant								
	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO
MAC									
AAC									
AMMC									
AMAC									

⁵ MAC --- Maximum Alternate Concentration as determined by ADEQ
AAC --- Average Alternate Concentration as determined by ADEQ
AMMC --- Actual Measured Maximum Concentration from Lab results

D. User Sample Location: _____

Sample Type (Composite samples are required except where not feasible or where grab samples are specifically required-- refer to 40CFR403.12(b)(5)(iii): _____

Number of Samples Taken: _____ Frequency (Daily, Weekly, etc) _____

Analytical Methods Used (Must be in accordance with 40CFR136--for example: EPA 608, 625, etc.) _____

(6) Certifications [§§403.12(b)(5)(viii) & 403.12(b)(6)]:

40 CFR 403.12(b)(6) Compliance Certification

A. Are applicable categorical pretreatment standards being met on a consistent basis? YES ___ NO ___

B. If no, do you require:

(i) Additional operation and maintenance (O&M) to achieve compliance? YES ___ NO ___

(ii) New or additional pretreatment facilities to achieve compliance? YES ___ NO ___

40 CFR 403.12(b)(5)(viii) Representative Certification

I certify, to the best of my knowledge, that the sampling and analysis as shown in Section 5 above is representative of the User's normal work cycles and the expected Discharges to the POTW.

In accordance with 40CFR403.12(b)(5)(viii) & (6) a qualified professional must complete and sign these certifications in the space below.

Name & Title _____
Qualified Professional (Please Type or Print)

Signature

Date _____

(7) A. If additional O&M or new or additional pretreatment will be required to meet categorical pretreatment standards on a consistent basis, provide an explanation in an attachment. In accordance with §403.12(b)(7) as of February 15, 1986 all 40CFR433 Metal Finishers were required to be in compliance. New sources must not commence discharge until compliance is possible.

B. Signatory Requirement [40 CFR 403.12(I)]

40 CFR 403.12(I)(3) Authorization to Sign Environmental Reports

I hereby authorize persons filling the position title of _____, responsible for the overall operation of the _____ facility in _____, Arkansas, to sign all regular reports required by National Pretreatment Standards--pursuant to ADEQ rules and/or Clean Water Act (CWA) regulations. This written authorization is provided in accordance with 40 CFR 403.12(I) and comparable state regulations.

Corporate official name & title here

Signature

Date

40 CFR 403.6(a)(2)(ii) Certification

I certify under penalty of law that I have personally examined and am familiar with the information in this Baseline Monitoring Report and all attachments, and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Name of Authorized Representative (Please Type or Print)

Official Title (Please Type or Print)

Signature

Date

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433

Use of this form is not an EPA/ADEQ requirement.

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION

A. LEGAL NAME & MAILING ADDRESS

B. FACILITY & LOCATION ADDRESS

C. FACILITY CONTACT:

TELEPHONE NUMBER:

e-mail:

(2) REPORTING PERIOD—FISCAL YEAR From ??? to ????

(Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

B. PERIOD COVERED BY THIS REPORT

&

FROM:

TO:

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

CORE PROCESS(ES)

CHECK EACH APPLICABLE BLOCK

- Electroplating
- Electroless Plating
- Anodizing
- Coating
- Chemical Etching and Milling
- Printed Circuit Board Manufacture

ANCILLARY PROCESS(ES)*

LIST BELOW EACH PROCESS USED IN THE FACILITY

*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

B. CHANGES:

SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.

C. Number of Regular Employees at this Facility

D. [Reserved]

(4) FLOW MEASUREMENT

INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge
Regulated (Core &			
Regulated (Cyanide)			
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary			
Total Flow to POTW			*****

*"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM

CHECK EACH APPLICABLE BLOCK

- Neutralization
- Chemical Precipitation and Sedimentation
- Chromium Reduction
- Cyanide Destruction
- Other _____
- None

B. COMMENTS ON TREATMENT SYSTEM

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSES-- CORE & ANCILLARY--(AFTER TREATMENT, IF APPLICABLE). ATTACH THE LAB ANALYSIS WHICH SHOWS A MAXIMUM; TABULATE ALL THE ANALYTICAL DATA COLLECTED DURING THE REPORT PERIOD IN THE SPACE PROVIDED BELOW. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

Pollutant(mg/l)	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO*
Max for 1 day	0.11	2.77	3.38	0.69	3.98	0.43	2.61	1.20	2.13
Monthly Ave	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured									
Ave Measured									

Sample Location _____

Sample Type (Grab or Composite) _____

Number of Samples and Frequency Collected _____

40CFR136 Preservation and Analytical Methods Use: Yes No

(6) CERTIFICATION

A. [Reserved]

[Reserved]

B. CHECK ONE: §433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED §433.12(a) TTO CERTIFICATION

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last semi-annual compliance report. I further certify that this facility is implementing the toxic organic management plan submitted to Arkansas Department of Environmental Quality.

(Typed Name)

(Corporate Officer or authorized representative)

Date of Signature _____

CORPORATE ACKNOWLEDGEMENT (Optional)

STATE OF ARKANSAS)
COUNTY OF _____)

Before me, the undersigned authority, on this day personally appeared _____ of _____, a corporation, known to me to be the person whose name is subscribed to the foregoing instrument(s), and acknowledged to me that he executed the same for purposes and considerations therein expressed, in the capacity therein stated and as the act and deed of said corporation.

Given under my hand and seal of office on this _____ day of _____, 200__.

Notary Public in and for _____
County, Arkansas

My commission expires _____.

(7) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]

§6602 [42 U.S.C. 13101] Findings and Policy para (b) Policy.--The Congress hereby declares it to be the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.

The User may list any new or ongoing Pollution Prevention practices:

(8) GENERAL COMMENTS

(9) SIGNATORY REQUIREMENTS [40CFR403.12(1)]

I certify under penalty of law that I have personally examined and am familiar with the information in this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE

OFFICIAL TITLE

DATE SIGNED