

Wilson, Tabatha

From: Gilliam, Allen
Sent: Thursday, August 29, 2013 12:24 PM
To: Leon Ryan (lryan@southernaluminum.com)
Cc: Fuller, Kim; Wilson, Tabatha; Bernie K. Finch; magnolia russell thomas
Subject: AR0043613_Southern Aluminum ARP001059 Aug 2013 corrective action response to SNC July analyticals and ADEQ reply_20130829
Attachments: Southern Aluminum's July 2013 Analyticals and Corrective Action Plan.pdf

Leon,

This office is in receipt of the corrective action plan drafted by Finch Environmental on behalf of Southern Aluminum (SA) as well as the July '13 analyticals of your latest batch discharge.

Based on the attached analyticals from the sample taken on 7/29/13 (compliant with "monthly average" Metal Finishing standards in 40 CFR 433) and the analyticals from the sample taken on 6/19/13 (non-compliant with the "monthly average" standards), this office would agree some frequency less than monthly batch discharges from the work tank(s) coupled with the rinse tank wastewater is the logical action to take to remain compliant with the metal finishing standards depending on production and subsequent work tank usage.

This office will concede to your statement that "we had no opportunity to obtain another sample within 30 days" because of your batch discharge schedule. This will be taken into consideration as to why the 2nd requirement in 40 CFR 403.12(g)(2), "If sampling performed by an SA indicates a violation, SA shall notify ADEQ within 24 hours of becoming aware of the violation. SA shall also repeat the sampling and analysis and submit the results of the repeat analysis to ADEQ within 30 days after becoming aware of the violation." was not met.

The first part of the above requirement was still not made by SA and should be kept in mind.

Please submit the results of your next batch discharge. If so desired, a direct e-mail attachment from your contract lab could be set up for them to submit your results directly to this office as soon as they are conducted circumventing the need for the above 24 hour notification requirement.

Also keep in mind you may scan your periodic compliance reports in .pdf format and attach them to an e-mail to this office saving time and paperwork.

If there are any further questions please feel free to contact this office,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Craig Uyeda, Enforcement Branch Manager
Alan Anderson, Enforcement Analyst
Russell Thomas, Magnolia Wastewater Superintendent
Bernie Finch, Finch Environmental

AVOCL

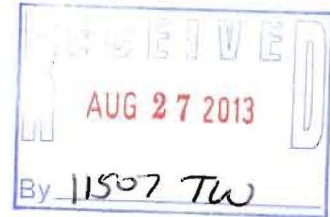
Finch Environmental, PLC

9 Heritage Park Circle
North Little Rock, Arkansas 72116-8528

*Municipal and Industrial
NPDES Storm Water
Pollution Prevention Plans
Control Plans Environmental Permitting
Reporting Hazardous Waste
Pretreatment*

8/19/2013

Mr. Allen Gilliam
Pretreatment Coordinator
ADEQ
5301 Northshore Drive
North Little Rock, AR 72118



Re: Southern Aluminum Company, Inc., Pretreatment Tracking Number ARP001059

Dear Mr. Gilliam,

Please accept this letter and consider it a corrective action plan for the referenced facility located in Magnolia, Arkansas.

Also, please reference your e-mail dated August 1, 2013 to Colleen Tuggle and Mr. Leon Ryan both of Southern Aluminum Company, Inc.

On July 29, 2013 a sample was taken of combined effluent from the wash tank and the rinse tank. The analysis of this sample revealed compliant wastewater (40 CFR 433.17). Zinc, which has been the problematic metal in the past was shown to be 1.418 mg/l. This concentration is less than the monthly average limit for Zinc of 1.48 mg/l. As you know the daily maximum allowed for Zinc of 2.61 mg/l does not apply since the infrequent discharges from Southern Aluminum cause the monthly average concentration to be the limiting standard. Attached you will find the analytical results of that sample.

Finch Environmental, PLC has recently established a discharge protocol with Southern Aluminum Company to discharge sources from core processes not less frequent than once per month. We believe that more frequent emptying of the wash tank will not allow the concentration of Zinc to exceed the monthly average concentration limit found at 40 CFR 433.17.

Southern Aluminum Company will continue to notify the City of Magnolia Wastewater Treatment System in the event a non-compliant discharge has occurred. As you know our discharge is considered a batch discharge instead of a continuous discharge. Since we obtained only one sample during this batch discharge event we had no opportunity to obtain another sample within 30 days. However, a sample was taken on July 29, 2013 which was the next discharge to occur after the June 19, 2013 discharge.

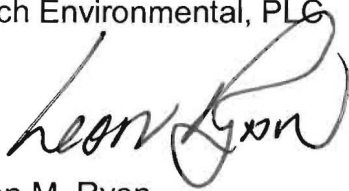
Please accept this submittal and contact me with questions.

Thank you.

Sincerely,

B.K.F.

Bernie K. Finch
Finch Environmental, PLC

A handwritten signature in black ink, appearing to read "Leon M. Ryan". The signature is stylized with a large, looping initial "L" and "R".

Leon M. Ryan
Vice President/General Manager
Southern Aluminum Company, Inc.

Attachment

Cc Colleen Tuggle, Southern Aluminum

Environmental Services Company, Inc.

Corporate Office
 13715 West Markham
 Little Rock, AR 72211
 Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch
 1107 Century Avenue
 Springdale, AR 72762
 Tel. (479)750-1170 Fax (479)750-1172

Control Number: 1307010529
 Customer Name : SOUTHERN ALUMINUM CO., INC.
 Customer Number : 2754
 Report Date : 08/05/13

Sample Date : 07/29/13
 Sample Time : 1300
 Sample Type : GRAB WATER
 Sample From :

Collected By: COLLEEN TUGGLE
 Delivery By : UPS
 Work Order :
 Purchase Order :

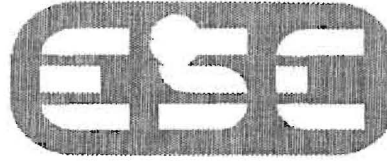
<u>Laboratory Analysis</u>							<u>Quality Assurance</u>	
<u>Analysis</u>			<u>Result</u>	<u>Notes</u>	<u>Quantity</u>	<u>Method</u>	<u>Precision</u>	<u>Accuracy</u>
<u>Date</u>	<u>Time</u>	<u>By</u>					<u>Parameter</u>	<u>% RPD</u>
07/31	1540	NTR	Cyanide Total (as CN)	< 0.0100 mg/L		1999 4500-CN E	2.82	93.3
07/29	1300	CT	pH	7.0 S.U.		SM 18 4500 H+B		
08/01	1051	RAH	Chromium	< 1.00 ug/L		EPA 200.8	3.47	91.3 *
08/01	1051	RAH	Nickel	20.00 ug/L		EPA 200.8	2.68	99.3 *
08/01	1051	RAH	Copper	29.00 ug/L		EPA 200.8	0.79	98.7 *
08/01	1051	RAH	Zinc	1418.00 ug/L		EPA 200.8	2.71	115.8 *
08/01	1051	RAH	Silver	< 0.50 ug/L		EPA 200.8	6.37	106.6 *
08/01	1051	RAH	Cadmium	< 0.10 ug/L		EPA 200.8	2.73	107.7 *
08/01	1051	RAH	Lead	< 0.50 ug/L		EPA 200.8	1.11	82.6 *

* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature 
 Environmental Services Co., Inc.

Environmental Services Company, Inc.
 Corporate Office
 13715 West Markham P.O. Box 55146
 Little Rock, AR 72211 Little Rock, AR 72215
 website: www.esclabs.com



Environmental Services Company, Inc.
 Northwest Branch
 1107 Century
 Springdale, AR 72764

Phone: 501-221-2565 Fax: 501-221-1341

CHAIN OF CUSTODY

Phone 479-750-1170 Fax: 479-750-1172

Client Information				Project Information						Requested Parameters									
Company Name: Southern Aluminum Co., Inc.				Permit/Project #:						Cyanide (g) Metals (See Comments)									
Address: #5 Hwy 82 West Magnolia, AR 71753				Purchase Order #:															
Telephone: 800-221-0408				Work Order #:															
Fax: 870-234-4665				Sampler Name(s): Colleen Tuggle															
Contact: Ms. Colleen Tuggle				and Signature(s): <i>Colleen Tuggle</i>															
ESC Client Number: 2754																			
Sample Identification		Sample Collection				Sample Containers													
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#										
	1307010529	7-29-13	1:00pm	Grab	Water	Plastic	1 Liter	NaOH+Ascorbic	1	X									
		7-29-13	1:00pm	Grab	Water	Plastic	8 oz	HNO3 to pH <2*	1	X									
Relinquished By: (Signature and Printed Name) <i>Colleen Tuggle</i>		Date	Time	Received By: (Signature and Printed Name) <i>Cindy Strauss</i>		Date	Time	Custody Seals:											
		7-29-13	1:00pm	<i>Cindy Strauss</i>		7-30-13	1020	Used? <input checked="" type="checkbox"/> Intact? <input type="checkbox"/>											
Relinquished By: (Signature and Printed Name) <i>Cindy Strauss</i>		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Turnaround:											
		7-30-13	1045					Regular <input checked="" type="checkbox"/> Special <input type="checkbox"/>											
Relinquished By: (Signature and Printed Name)		Date	Time	Received for Lab By: (Signature and Printed Name) <i>Paul Cant</i>		Date	Time	Were samples properly preserved:											
				<i>Paul Cant</i>		7/30/13	1095	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>											
				Flow Data		Field Test		Time		Analyst		Result		Result		Units			
Comments: Cd(48.PS), Cr(24.PS), Cu(29.PS), Pb(82.PS), Ni(28.PS), Ag(47.PS), Zn(30.PS)				Analyst:		pH:		1:00pm		<i>C. Tuggle</i>		7.0							
				Time:															
				Reading:															
				Units:															
* Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.						Fecal Start:													

CP