Gilliam, Allen

From: Gilliam, Allen
Sent: Monday, December 06, 2010 9:19 AM
To: 'Leon Ryan'; 'Colleen Tuggle'; 'Bernie K. Finch'
Cc: Fuller, Kim; Anderson, Alan; Garner, Cindy
Subject: AR0043613_Southern Aluminum (ARP001059) BMR & "2nd" Semi-Annual Report Review [Corrected]_20101206

Mr. Ryan,

Your Baseline Monitoring Report (BMR) and the December Semi-Annual Pretreatment Report were received and reviewed.

Both reports have been deemed complete with the federal regulations in 40 CFRs 403 and 433 (metal finishing category).

As you've noted, your wastewater remains non-compliant with the metal finishing daily and monthly average Zinc limitations.

Your correspondence through "Finch Environmental" completes the requirement to notify ADEQ of the Zn excursion further stating "...we have initiated a repeat sampling event for Total Zinc to be completed within 30 days..."

1) Per 40 CFR 403.8(f)(2)(viii), "[...Southern Aluminum]...is in significant noncompliance [SNC] if its violation meets one or more of the following criteria:...:(A) Chronic violations of wastewater Discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement".

Currently being in SNC, Southern Aluminum must submit a corrective action plan with a compliance schedule within 45 days per 40 CFR 403.8(f)(iv), "Require (A) the development of a compliance schedule by [Southern Aluminum] for the installation of technology required to meet applicable Pretreatment Standards and Requirements and (B) the submission of all notices and self-monitoring reports from Industrial Users as are necessary to assess and assure compliance by Industrial Users with Pretreatment Standards and Requirements..."

2) Per 40 CFR 403.12(c), "Compliance schedule for meeting categorical Pretreatment Standards. The following conditions shall apply to the schedule required by paragraph (b)(7) of this section:

(1) The schedule shall contain increments of progress in the form of dates for the commencement and completion of major events leading to the construction and operation of additional pretreatment required for [Southern Aluminum] to meet the applicable categorical Pretreatment Standards (e.g., hiring an engineer, completing preliminary plans, completing final plans, executing contract for major components, commencing construction, completing construction, etc.).

(2) No increment referred to in paragraph (c)(1) of this section shall exceed 9 months.

(3) Not later than 14 days following each date in the schedule and the final date for compliance, [Southern Aluminum] shall submit a progress report to [ADEQ and an appropriate City official] including, at a minimum, whether or not it complied with the increment of progress to be met on such date and, if not, the date on which it expects to comply with this increment of progress, the reason for delay, and the steps being taken by the Industrial User to return the construction to the schedule established. In no event shall more than 9 months elapse between such progress reports to the [ADEQ and an appropriate City official]."

3) Lastly, this office would have to disagree with your statement on the BMR, page 2, (3)"Description of User Operations", C. where it states "No TTOs indicated..." The attached MSDS (Wilsonart 800/801) includes Acetone and Toluene. These are two readily identifiable Total Toxic Organics per 40 CFR 433.11(e).

And, your regulated discharge flows should be more correctly identified as "1350 gpd batch discharged every 3 months. 15 gpd is confusing although you have stated "Batch* - *Four times per year".

If there are questions or comments, please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

AR

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

11/22/2010

8536

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

VH

Re: Southern Aluminum, ARP001059

Dear Mr. Gilliam,

Please refer to your October 25, 2010 e-mail and accept this submittal for the referenced facility located in Magnolia, Arkansas.

In this submittal you will find the following items:

1. Revised Baseline Monitoring Report and Attachments;
2. Revised Semi-Annual Report for Industrial Users Regulated by 40 CFR 433;
3. Revised Schematic drawing of the process at Southern Aluminum; and
4. The results of an additional sample of the regulated waste stream analyzed for Total Zinc

The analytical results of the additional sample taken on 10/21/2010 indicated an excursion above the monthly average and daily maximum pretreatment standards for new sources (PSNS) for Zinc (T) found at 40 CFR 433.17. In accordance with 40 CFR 403.12 please consider this letter as notification of Southern Aluminum becoming aware of the issue and please understand that we have initiated a repeat sampling event for Total Zinc to be completed within 30 days of becoming aware of the excursion.

Southern Aluminum intends to submit another Semi-Annual Report during the month of December, 2010 as required by federal regulations.

Please accept this information and contact me with questions.

Thank you.

Sincerely,

B. K. F.

Bernie K. Finch
Finch Environmental, PLC

Attachments

Cc Colleen Tuggle, Southern Aluminum (w/o attachments)

Telephone/Fax: 501.771.6940 E-mail: bkfinch@sbcglobal.net www.finchenvironmental.com

✓

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: Southern Aluminum

Mailing Address: P.O. Box 884

Magnolia, AR Zip: 71753

B. Facility Name: Southern Aluminum

Location: 5 Highway 82 West

Magnolia, AR Zip: 71753

C. Name of Owners: John Mark Taylor

D. Name of Operators: John Mark Taylor

E. Facility Contact (Provide the name, title & phone number of a designated person to contact if additional information is necessary) :
Colleen Tuggle, Director of Human Resources, 870.234.8660

F. Number of Employees 135 G. Number of Shifts 2

H. Number of Months per Calendar Year which Plant normally operates 12

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)
City of Magnolia, Publicly Owned Treatment Works

J. Provide the date the facility began regulated discharge to the POTW (sewerage authority, municipality, etc.)
November 14, 2008

Date facility installed/commence construction of 40CFR433 Core operation(s) February 20, 2009

(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
None	N/A	N/A	N/A

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

A. List Raw Material/Basis Metals Used: Mill Aluminum 6063 Alloy, Spraylat Paints, Steelcote 315B, Grade 5 cap screws, finished hex head nuts, rivets, Ivory bar soap, mean green detergent, Wilsonart adhesive, Kool Mist, Isopropyl Alchohol. (First Page of MSDS or labels provided with the submittal for all except Mill Aluminum 6063 Alloy).

B. List Toxic Organics (TTO) & alloy metals and their source (Name of Chemical/Basis Metal):
Mill Aluminum 6063 Alloy
No TTOs indicated when comparison made between constituents of materials used in process (based on MSDS) and TTOs listed at 40CFR 433.11

C. Describe Manufacturing or Service Activities Conducted and the Final Products: Construct tables and table legs from Mill 6063 T6 Aluminum

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

Coating — Source Category

Southern Aluminum purchases clean, dry wrapped Aluminum extrusions.
Paint Line Process (2050 gallon wash tank (Steelcote and Water at 140°F), 832 gallon rinse tank, powder paint booth, bake oven): Extrusions are bolted together and cut to size. Products are washed, rinsed and placed in a dry off oven at 400° F. Extrusions are hung on the paint line conveyor and painted. Products are then removed and sent to assembly.
Dip Process (1000 gallon dip tank – Steelcote and Water at 140°F): Welded leg tubing that is not treated in the paint line process is dipped in phosphatizing tank, dried, removed, and sent to assembly.

_____ Source Category

_____ Source Category

D. User Sample Location: All three (3) regulated waste streams: Paint Line Process (Wash Tank, Rinse Tank) and Dip Tank: Samples are taken at the point where the 2050 gallon acid wash tank containing 35 gallons Steelcote® at 140 ° F and the 832 gallon Rinse Tank commingle with the discharge from the 1000 gallon Dip Tank Containing 1000 gallons water and 20 gallons Steelcote® at 140°F. The commingled three (3) regulated streams then flow to the municipal collection system. No sanitary wastewater or cooling water commingles with these three regulated waste streams.

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

Number of Samples Taken: 1 Frequency (Daily, Weekly, etc) Semi-Annually

Analytical Methods Used (Must be in accordance with 40CFR136--for example: EPA 608, 625, etc.) EPA 136

(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 _X_

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 _X*_ NO ___

*Retest for Total Zinc included with this submittal to the Control Authority (CA) by e-mail within 30 days, additional pretreatment will likely be required.

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 Leon M. Ryan
Qualified Professional (Please Type or Print)

Leon Ryan
Signature

Date 11-23-10

(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

B. Signatory Requirement [**40 CFR 403.12(l)**]

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

I hereby authorize persons filling the position title of Vice President and General Manager, responsible for the overall operation of the Southern Aluminum facility in Magnolia, 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(l) and comparable state regulations.

Leon M. Ryan, Vice President and General Manager
Corporate official name & title here

Signature

11-23-10
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.

Leon M. Ryan
Name of Authorized Representative (Please Type or Print)

Vice President and General Manager
Official Title (Please Type or Print)

Signature

11-23-10
Date

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
Coating	40CFR433	A	2514	February 20, 2009

*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 15 GPD Maximum 15 GPD

B. Individual Process Flows in Gallons per Day[1] (gpd)

[1]Referring 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] Dilute wastestreams include non-contact cooling water, sanitary waste, etc.	Average Flow Rate (gpd)	Max. Flow Rate (gpd)	Type Discharge[3]
Regulated Streams	15	15	Batch*
			*Four times per year
Unregulated Streams	N/A	N/A	N/A
Dilute Streams			
Non-Contact Cooling Water	N/A	N/A	N/A
Sanitary Wastewater	500 gpd	500 gpd	Domestic

[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 process[4]:

Coating
Core Process — Aluminum Alloy products are coated using phosphatizing 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	0.0001	0.0074	0.069	0.0009	0.042	0.0001	5.02	0.1224	0.076
Average	0.0001	0.0074	0.069	0.0009	0.042	0.0001	5.02	0.1224	0.076

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.

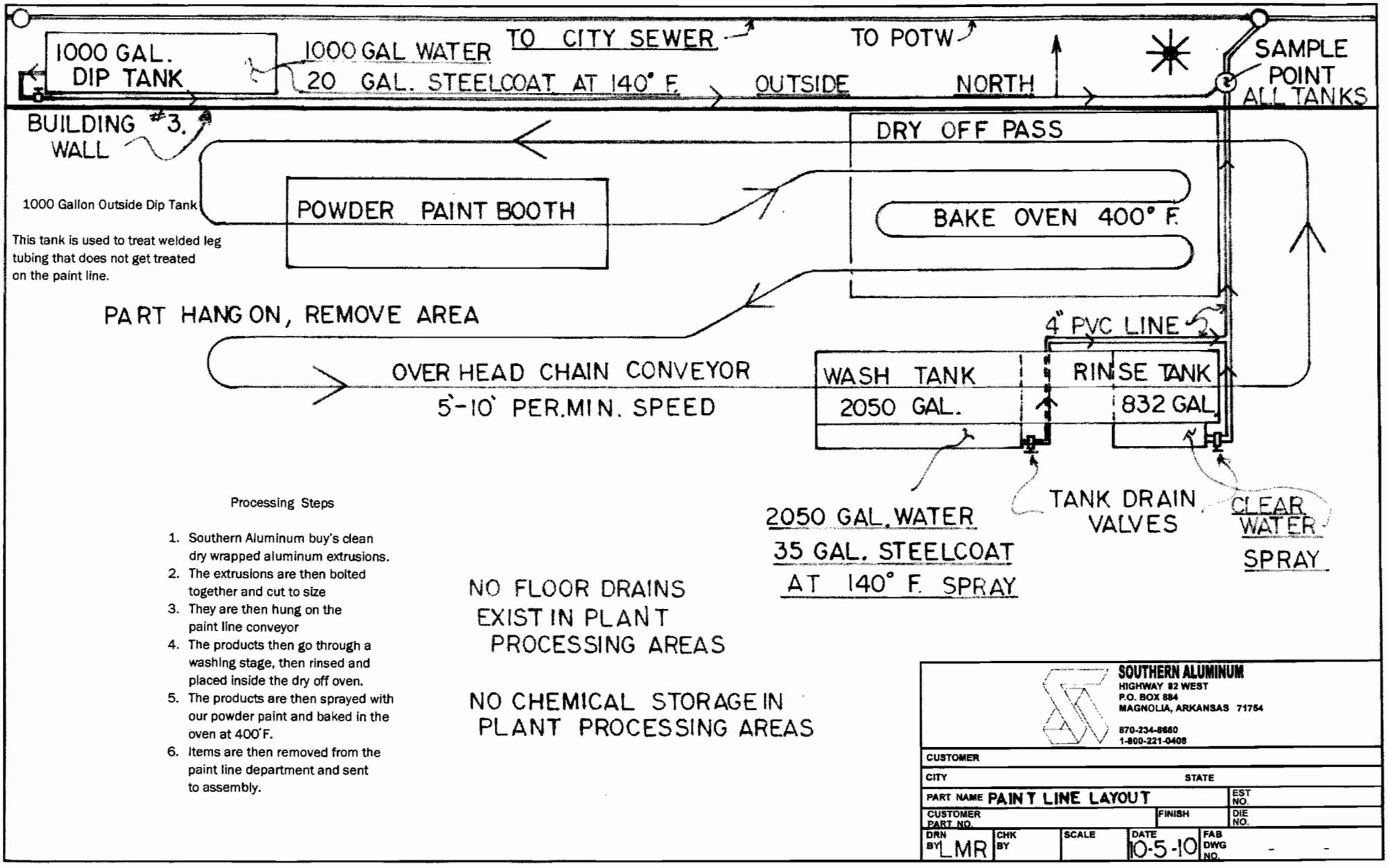
[4] §403.6(a)(2)(ii)--Optional for Existing Sources and for New Sources which have requested certification.

Attachment to Baseline Monitoring Report

Flow Schematic

Southern Aluminum

Magnolia, AR



Processing Steps

1. Southern Aluminum buy's clean dry wrapped aluminum extrusions.
2. The extrusions are then bolted together and cut to size
3. They are then hung on the paint line conveyor
4. The products then go through a washing stage, then rinsed and placed inside the dry off oven.
5. The products are then sprayed with our powder paint and baked in the oven at 400°F.
6. Items are then removed from the paint line department and sent to assembly.

NO FLOOR DRAINS EXIST IN PLANT PROCESSING AREAS

NO CHEMICAL STORAGE IN PLANT PROCESSING AREAS

SOUTHERN ALUMINUM
HIGHWAY 82 WEST
P.O. BOX 884
MAGNOLIA, ARKANSAS 71754
870-234-8660
1-800-221-0408

CUSTOMER				
CITY		STATE		
PART NAME PAINT LINE LAYOUT				EST NO.
CUSTOMER PART NO.		FINISH		DIE NO.
DRN BY LMR	CHK BY	SCALE	DATE 10-5-10	FAB DWG NO. - -

Attachment to Baseline Monitoring Report

Material Safety Data Sheets (MSDS) and Labels for Raw Materials Used in Process

Southern Aluminum Company

Magnolia, AR

MATERIAL SAFETY DATA SHEET

COMPLIES WITH OSHA's 29 CFR 1910, 1200 AND STATE HAZARD COMMUNICATION STANDARD

A BRITE COMPANY

3217 Wood Drive • Garland, Texas 75041 • Toll Free: 1-888-BA BRITE
Fax: 214-291-0300 • www.abrite.com

24 HOUR EMERGENCY PHONE NUMBER 1-800-424-9300 (CHEMTREC)

SECTION 1: PRODUCT IDENTIFICATION

TRADE NAME: Steelcote 315 B
GENERAL OR GENERIC ID: Acid Mixture
DATE PREPARED: 4/28/04
LATEST REVISION DATE: 12/17/07
NFPA/HMIS HAZARD CODES
(minimal = 0; slight = 1; moderate = 2; serious = 3; severe = 4)
HEALTH: 2/2 FIRE: 0/0 REACTIVITY: 0/0 SPECIAL: H

SECTION 2: HAZARDOUS INGREDIENTS IDENTITY INFORMATION

HAZARDOUS COMPONENTS	CAS #	OSHA PEL	ACGIH TLV	IDLH LEVEL	% /WT
*Phosphoric Acid	7664-34-2	1 mg/m^3	1mg/m ^{3}	ND	15
*Nitric Acid	7697-37-2	2 ppm	5mg/m^3	100 ppm	4
*Sulfuric Acid	7664-93-9	1mg/m^3	1mg/m^3	80mg/m^3	1.5
Ammonium Bifluoride	1341-49-7	2.5mg/m^3	2.5mg/m^3	ND	<1
Sodium Hydroxide	1310-73-2	2 mg/m^3	2 mg/m^3	250mg/m^3	<20
Polyethylene phenyl ether phosphate	Not listed	N/A	N/A	N/A	<5

*= Reportable under SARA Title III

SECTION 3: PHYSICAL/CHEMICAL CHARACTERISTICS

BOILING POINT: N/A
VAPOR PRESSURE: N/A
VAPOR DENSITY: Negligible
SOLUBILITY IN WATER: complete
SPECIFIC GRAVITY: 1.16
PERCENT VOLATILE: N/A
EVAPORATION RATE: N/A
pH (1% Solution): 2.6
APPEARANCE AND COLOR: Clear to light yellow liquid with no odor.

SECTION 4: FIRE AND EXPLOSION HAZARD DATA

FLASH POINT: not flammable
FLAMMABLE LIMITS: N/A
EXTINGUISHING MEDIA: Water fog , carbon dioxide, alcohol foam, dry chemical and Halon.
SPECIAL FIRE FIGHTING PROCEDURES: Pressure demand, self contained respiratory protection and protective clothing should be worn by firefighters.
UNUSUAL FIRE AND EXPLOSION HAZARDS: Non combustible material. Will liberate flammable hydrogen gas upon contact with many metals.

SECTION 5: REACTIVITY DATA

STABILITY: Stable
HAZARDOUS POLYMERIZATION: Will not occur
INCOMPATIBILITY: Reacts vigorously with alkalis producing heat. Reacts with many metals producing heat and hydrogen gas.
CONDITIONS TO AVOID: Under normal conditions product is stable.
HAZARDOUS DECOMPOSITION PRODUCTS: Oxides of nitrogen, toxic fumes of phosphorus pentoxide.

SECTION 6: HEALTH HAZARD DATA

ROUTES OF ENTRY /SIGNS AND SYMPTOMS OF EXPOSURE:
ACUTE: Corrosive to eyes and skin, concentrated solutions can destroy tissue on contact. Can cause blindness.
INGESTION: Harmful if swallowed. Can cause severe burns and complete tissue perforation of mucous membranes of the mouth, throat, esophagus and stomach if swallowed.
INHALATION: Mist or dust may cause irritation to nose, throat and lungs. May cause damage to the upper respiratory tract or lungs.
CHRONIC EFFECTS: None known
CARCINOGENS: None under OSHA, IARC or NTP.
MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: None known.
EMERGENCY AND FIRST AID PROCEDURES:
EYES: Immediately flush with plenty of water for 15 minutes. See a physician.
SKIN: Wash with soap and water. Remove contaminated clothing. See a physician if irritation occurs.
INHALATION: Remove to fresh air. If breathing has stopped start artificial respiration. See a physician.
INGESTION: Call a physician immediately, **DO NOT INDUCE VOMITING DILUTE BY DRINKING WATER (MILK IF AVAILABLE) NEVER GIVE LIQUIDS TO AN UNCONSCIOUS PERSON.**

SECTION 7: PRECAUTIONS FOR SAFE HANDLING AND USE

SPILL OR LEAK PROCEDURES:
SMALL SPILLS: Flush to treatment system with large amounts of water.
LARGE SPILLS: Sweep into suitable containers. Keep out of fish bearing waters.
WASTE DISPOSAL METHOD: Dump to waste water treatment system, observe local, state and federal regulations. Product is hazardous waste.

SECTION 8: TRANSPORTATION AND LABELING

REGULATORY INFORMATION:
DOT HAZARD CLASS: 8
SHIPPING NAME: Corrosive liquid, acidic, inorganic n.o.s (Phosphoric Acid)
ID NUMBER: UN 3264
PACKING GROUP: II
LABELS: 8
TSCA: All components included in the inventory.

SECTION 9: HANDLING AND STORAGE

HANDLING AND STORING: Keep container closed when not in use.
OTHER PRECAUTIONS: Keep out of reach of children. Store in proper chemical storage area.
If water pollution occurs, notify the proper authorities.

SECTION 10: CONTROL MEASURES

RESPIRATORY PROTECTION: Use NIOSH approved respiratory equipment for dust and mist.
VENTILATION: Local exhaust to maintain air contamination below TLV limit.
GLOVES: Rubber gloves, neoprene, or synthetic rubber required.
EYE PROTECTION: Safety glasses or goggles required.
OTHER PROTECTIVE EQUIPMENT: As needed to prevent prolonged or repeated skin contact. Eye wash fountain and safety shower in work area.
WORK /HYGIENIC PRACTICES: Launder contaminated clothing before reuse.

SPRAYLAT CORPORATION

MATERIAL SAFETY DATA SHEET

For Spraylat Powder Coatings and Associated Powder Materials

1701 East 122nd Street
Chicago, IL 60633
(773) 646-5900
Fax: (773) 646-3743

716 South Columbus Avenue
Mount Vernon, NY 10550
(914) 699-3030
Fax: (914) 699-3035

3465 South La Cienega Blvd.
Los Angeles, CA 90016
(310) 559-2335
Fax: (310) 836-6094

3333 North Interstate 35
Gainesville, TX 76240
(940) [redacted]-9590
Fax: (940) 665-8867

e-mail HSEcoordinator@Spraylat.com

PREPARED BY : Health, Safety and Environmental Coordinator

EMERGENCY PHONE:	**1-800-424-9300**	**Chemtrec**
INTERNATIONAL TRANSPORTATION ACCIDENTS:	**1-703-527-3887**	**Chemtrec**

I. CHEMICAL PRODUCT IDENTIFICATION

Product Name : **PPLS3225Y Desert Tan Polyester Structure Low Cure**

Date Printed : 09/25/01
Revision Date : 09/19/01 Revision Number : 1
Supercedes : None

COMPOSITION/INFORMATION ON INGREDIENTS - *(EXPOSURE LIMITS - SEE SECTION VIII)*

INGREDIENT NAME	CAS #	%
Calcium carbonate	471-34-1	25.01 - 30.00
Titanium dioxide	13463-67-7	5.01 - 10.00
1,3,5-Triglycidyl Isocyanurate (TGIC)	2451-62-9	1.01 - 5.00

If ingredient percentages do not total 100%, the balance is due to rounding or applies to ingredient(s) deemed nonhazardous under 29 CFR 1910.1200 (Hazard Communication Standard)

III. HAZARDS IDENTIFICATION

	HMIS
HEALTH	2 *
FLAMMABILITY	1
REACTIVITY	0

0 = Least 1 = Slight 2 = Moderate 3 = High 4 = Extreme * = Chronic Health Effects

Routes of Entry: Inhalation, Ingestion, Skin contact, Eye contact.

Medical Conditions Aggravated: Lung disease, Eye disease, Skin disease including eczema and sensitization, **Liver** disease.

Immediate (Acute) Health Effects:

Low to moderate airborne particulate concentrations may induce respiratory irritation and/or aggravate pre-existing respiratory problems, even in the absence of a toxic component. High airborne particulate concentrations may also reduce visibility, cause injury to the skin or mucous membranes by chemical or mechanical action or by rigorous skin cleansing procedures needed for their removal. Dermatitis and sensitization may occur in susceptible individuals.

Inhalation: Can cause minor respiratory irritation, dizziness, weakness, fatigue, nausea, and headache. Loss of appetite Nosebleeds Harmful. Can cause systemic damage, see target organs below.

n Contact: Can cause minor skin irritation, defatting, and dermatitis.

Eye Contact: Contact with the eyes may cause moderate to severe eye injury. Eye contact may result in tearing and reddening, but not likely to permanently injure eye tissue. Temporary vision impairment (cloudy or blurred vision) is possible.

PROCTER & GAMBLE

Commercial Products Group
CPG TN-6
2 Procter & Gamble Plaza
Cincinnati, Ohio 45202

MATERIAL SAFETY DATA SHEET

Issue Date: 6/99

SECTION I
Emergency Telephone Number: Procter & Gamble Operator 1-513-983-1100
Identity: **IVORY BAR SOAP**
Ingredients/Chemical Name: Soap from animal and vegetable fats, water and minor ingredients
Other: N.A.

SECTION II - HAZARDOUS INGREDIENTS/IDENTITY INFORMATION
Hazardous Ingredients as defined by OSHA, 29 CFR 1910. 1200.
NOTE: This product is not "hazardous" within the meaning of the OSHA Hazard Communication Standard.
DOT: Not regulated

SECTION III - PHYSICAL/CHEMICAL CHARACTERISTICS	
Boiling Point (°F): N.A.	Specific Gravity (H_2O=1): 0.9
Vapor Pressure (mm Hg): N.A.	Percent Volatile by Volume (%): 21%
Vapor Density (Air=1): N.A.	Evaporation Rate (nBuOAc=1): N.A.
Solubility in Water: Moderate	Appearance and Odor: White bar with light perfume

SECTION IV - FLAMMABILITY AND REACTIVITY		
Flash Point (Method Used): N.A.		Explosive Limits: LEL: N.A. UEL: N.A.
Extinguishing Media: Use CO_2, water or dry chemical.		
Special Fire Fighting Procedures: None Known		
Unusual Fire Hazards: None Known		
Stability	Unstable:	Conditions to Avoid: None Known
	Stable: X	
Incompatibility (Materials to avoid): None Known		
Hazardous Decomposition/By Products: None Known		
Hazardous Polymerization	May Occur:	Conditions to Avoid: None Known
	Will Not Occur: X	

Rec from Vendor [illegible]
LIC

ChemPro, Inc. - Mean Green

Material Safety Data Sheet

Manufacturer [redacted]
Preparation Date October 15, 1989
Product Name Mean Green
Product Description A detergent compound containing sodium metasilicate builders, glycols and water

Section I - Hazardous Ingredients

Ingredients	ACGIH TLV	OSHA PEL	CAS NUMBER
Glycol Ether EB	25 ppm - skin	50 ppm - skin	111-76-2

Section II - Physical Data

pH	12.5 to 12.9	**Boiling Point**	N/D
Vapor Pressure	N/D	**Melting Point**	N/A
Solubility In Water	Complete	**Evap. Rate (Ehther = 1)**	< 1
Appearance and Oder	Clear green liquid with mild odor.		

Section III - Fire and Explosion Hazard Data

Flash Point None
Flammable Limits LFL N/A UFL N//A
Extinguishing Media This material is not flammable. Use Extinguisher suitable for surrounding fire, e.g., water fog, CO2, dry chemicals foam

Special Fire Fighting Procedures
Fire Fighters should wear full protective clothing and breathing apparatus.

Unusual Fire and Explosion Hazards
None Known

Section IV - Reactivity

Stability Stable at ambient temperature and pressures
Conditions to Avoid None known
Incompatibility (Materials to Avoid)
Strong oxidizing agents.
Hazardous Decomposition Products
Thermal - oxidative degration products include carbon monoxide and carbondioxide.
Hazardous Polymerization
Will not occur

Section V - Health Hazard Data

Mean Green is a concentrated product. Mean Green is much more concentrated than all-purpose spray cleaners. Mean Green is formulated to be used full strength on difficult jobs or diluted with water for normal jobs. If product is used full strength the following precautions should be taken if performing large jobs. (Sections 5, 6, 7, 8)

Route(s) of Entry Inhalation, ingestion, skin and eye contact
Eyes (Acute) Contact can cause severe irritation and, with greater exposures, burns with possible blindness.
Skin (Acute) Contact can irritate the skin. Prolonged contact can cause severe skin irritation or burns.
Inhalation Exposure to mists can cause irritation. Over exposure can damage the mucous membranes and the respiratory passages.

WILSONART INTERNATIONAL

Material Safety Data Sheet

Section 1. Chemical Product and Company Identification

Common Name	**Wilsonart(R)800/801**
Supplier	WILSONART INTERNATIONAL INC. P.O. BOX 6110 - 2400 Wilson Place, Temple, TX 76503 Information Phone: 800-433-3222 (U.S.A.) or 254-207-7000
Synonym	Also known as: Lokweld(R)800/801
Trade name	Wilsonart(R) 800/801
Material Uses	Adhesives for laminate.
Manufacturer	WILSONART INTERNATIONAL, INC. P.O. BOX 6110, Temple, TX 76503-6110 Information Phone: 254-207-7000 or 800-433-3222

Code	16405USA
MSDS#	16405
Validation Date	08/17/1999
Print Date	09/27/1999
Responsible Name	Wilsonart International Inc.
In Case of Emergenc	CHEMTREC: 800-424-9300 (USA) 703-527-3887 (International)

Section 2. Composition and Information on Ingredients

Name	CAS #	% by Weight	Exposure Limits
Hexane isomers	N/A	40-60	TWA: 1760 mg/m³ CEIL: 3500 mg/m³ ACGIH (TLV) [United States] TWA: 500 ppm STEL: 1000 ppm ACGIH (TLV) [United States]
Acetone	67-64-1	15-40	TWA: 750 ppm ACGIH (TLV) [United States] STEL: 1000 ppm ACGIH (TLV) [United States]
Toluene	108-88-3	5-15	TWA: 100 ppm STEL: 150 ppm OSHA (PEL) [United States] TWA: 50 ppm ACGIH (TLV) [United States]
N-hexane	110-54-3	1-5	TWA: 176 mg/m³ ACGIH (TLV) [United States] TWA: 50 ppm ACGIH (TLV) [United States]

Section 3. Hazards Identification

Physical State and Appearance	Liquid.
Emergency Overview	DANGER! EXTREMELY FLAMMABLE LIQUID AND VAPOR. VAPOR MAY CAUSE FLASH FIRE. VAPOR MAY CAUSE FLASH FIRE. HARMFUL IF INHALED OR SWALLOWED. MAY CAUSE RESPIRATORY TRACT, EYE AND SKIN IRRITATION. Use only with adequate ventilation.
Routes of Entry	Absorbed through skin. Skin contact. Eye contact. Inhalation. Ingestion.

Potential Acute Health Effects

Eyes	This product is an eye irritant.
Skin	Irritating to skin.
Inhalation	Inhalation of the vapors may cause dizziness, nausea, or anaesthetic effects. The product is a severe irritant for lungs and respiratory tract. Severe over-exposure can result in death.
Ingestion	Ingestion may cause severe gastric disturbances.

Continued on Next Page

Rec. from vendor 10/10/94 KK

Material Safety Data Sheet

I. General Information

Chemical Name & Synonyms	NOT APPLICABLE	Trade Name & Synonyms	KOOL MIST FORMULA 77
Chemical Family	NOT APPLICABLE	Formula	COMPLEX MIXTURE
Proper DOT Shipping Name	NOT APPLICABLE	DOT Hazard Classification	NONE
Manufacturer	KOOL MIST CORP. DIV. OF ALL-POWER MFG. CO.	Manufacturer's Phone Number	(213) 802-2640
Manufacturer's Address	13141 MOLETTE ST. SANTA FE SPRINGS, CALIF. 90670	Chemtrec Phone Number	N/A

II. Ingredients

Principal Hazardous Components	Percent	Threshold Limit Value (units)
CONTAINS NO INGREDIENTS KNOWN TO BE HAZARDOUS		
AS DEFINED IN OSHA 29 CFR 1910.1000 (SUBPART		
Z), OSHA CFR 1910.1200. THE NATIONAL FIRE		
PROTECTION ASSOCIATION, AND CALIFORNIA		
GISO 5194		

III. Physical Data

Boiling Point (°F)	212°	Specific Gravity (H_2O = 1)	1.02
Vapor Pressure (mm Hg.)	22	Percent Volatile By Volume (%)	NONE
Vapor Density (Air = 1)	.64	Evaporation Rate (_____ = 1)	LIKE WATER
Solubility in Water	INFINITE	pH	8.5
Appearance & Odor	GREEN COLOR--NO DISTINCTIVE ODOR		

IV. Fire & Explosion Hazard Data

Flash Point (Test Method)	NONE-SELF EXTINGUISHING	Auto Ignition Temperature	N/A
Flammable Limits	N/A	LEL	UEL
Extinguishing Media	NO FIRE HAZZARD		
Special Fire Fighting Procedures	N/A		
Unusual Fire & Explosion Hazards	NONE		

Rec from vendor initially. [illegible]

Material Safety Data Sheet

MSDS Number: 5120 - 17

24 Hour Emergency Assistance: CHEMTREC - Domestic: (800) 424-9300
24 Hour Emergency Assistance: CHEMTREC - International: (703) 527-3887
General Assistance Number: (713) 241-4819

SECTION 1 MATERIAL/COMPANY IDENTIFICATION

MATERIAL IDENTITY: Isopropyl Alcohol, 99%

COMPANY ADDRESS: Shell Chemical Company, P.O. Box 4320, Houston, TX 77210-4320, USA

SECTION 2 COMPOSITION

COMPONENTS	CAS#	CONCENTRATION
Isopropyl Alcohol	67-63-0	> 99.7 %weight

SECTION 3 HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

Appearance & Odor: Colorless, mobile liquid. Mild odor.
Health Hazards: Can cause severe lung damage and may be fatal if swallowed. Causes eye irritation. May be harmful if swallowed. May cause CNS depression.
Physical Hazards: FLAMMABLE. Vapors are heavier than air. Vapors may travel across the ground and reach remote ignition sources causing a flashback fire danger.

Health Effects

Inhalation:
Breathing of high vapor concentrations may cause central nervous system (CNS) depression resulting in dizziness, light-headedness, headache, nausea and loss of coordination. Continued inhalation may result in unconsciousness and death. Vapors expected to be slightly irritating.

Eye Contact:
Irritating to the eyes causing a burning sensation, redness, swelling and/or blurred vision.

Skin Contact:
May be slightly irritating to the skin.

Ingestion:
Irritating to the gastrointestinal tract, causing abdominal pain and vomiting, sometimes bloody. Ingestion may cause CNS depression, low blood pressure and rapid heart beat. May be harmful if swallowed. Liquid can directly enter the lungs (aspiration) when swallowed or vomited. Serious lung damage and possibly fatal chemical pneumonia (chemical pneumonitis) can develop if this occurs.

SECTION 4 FIRST AID MEASURES

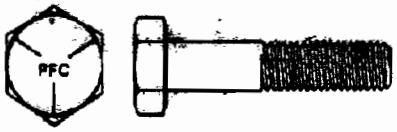
Inhalation:
Move victim to fresh air. If the victim has difficulty breathing or tightness of the chest, is dizzy, vomiting or unresponsive, give 100% oxygen with rescue breathing or CPR as required and transport to the nearest medical facility.

Eye:

PFC

FIRST CLASS SERVICE

MFG I.D. 7M4Y011 EKKLKR



GRADE 5 CAP SCREW NC

1/4 – 20 X 1/2

COARSE RoHS ZNC3

PFC PART NO (P) 00050-2408-021

QUANTITY (Q) 5000PCS

PFC LOT NO. (K) 19082105C3

MFG LOT NO. (1T) B8A0021Z2

TAIWAN

PFC

FIRST CLASS SERVICE

MFG I.D. 7P30117 KAKLKA

FINISHED HEX NUT NC

1/4 – 20

COARSE ZINC BLUE

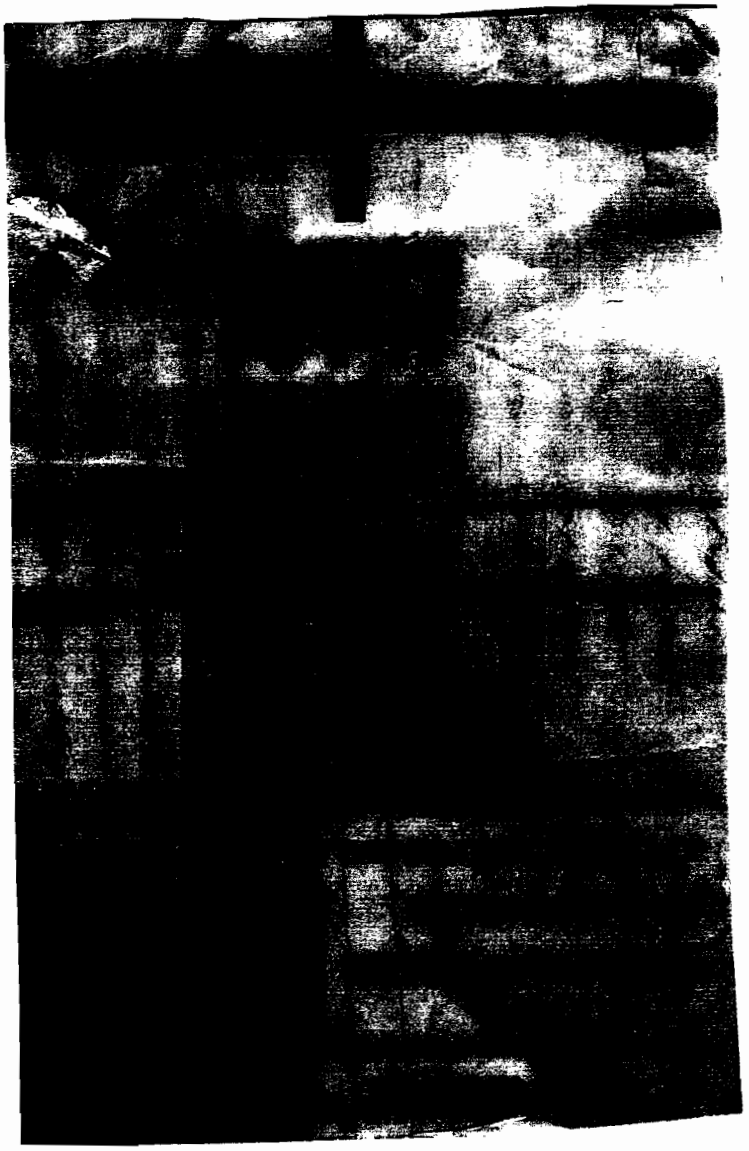
PFC PART NO (P) 00200-2400-021

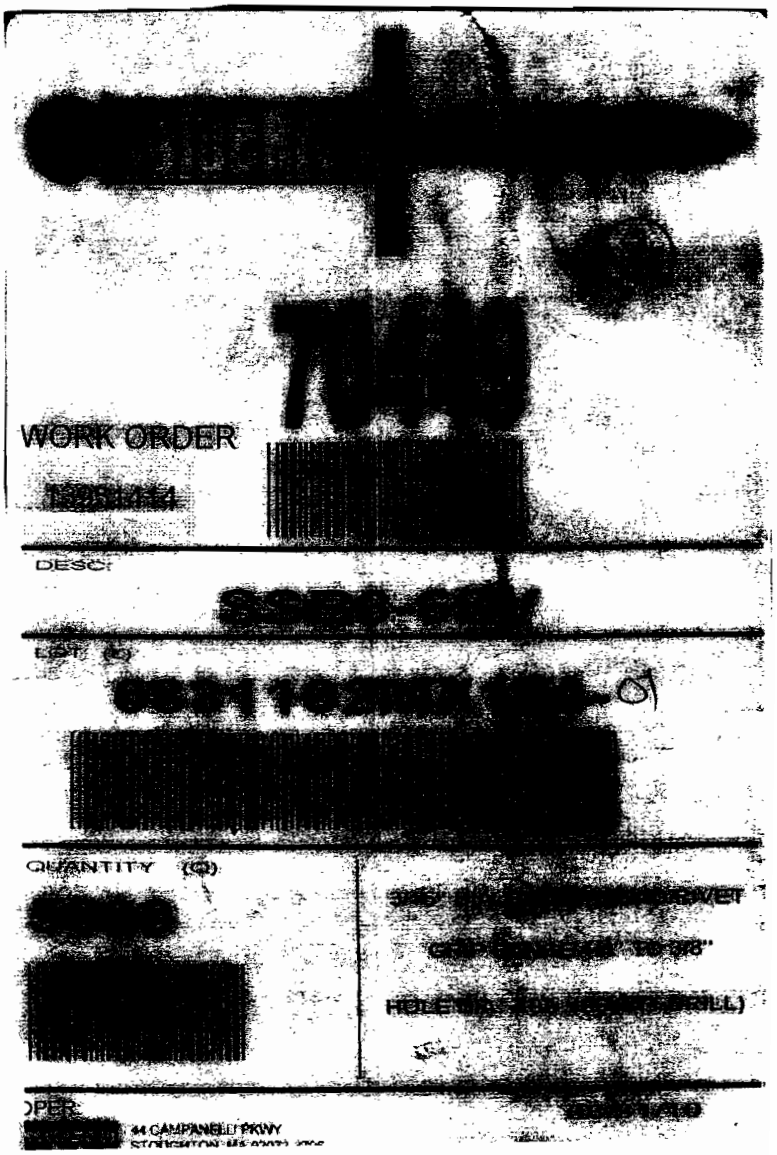
QUANTITY (Q) 9000PCS

PFC LOT NO. (K) 58053101

MFG LOT NO. (1T) N08070039

CHINA





WORK ORDER

Attachment to Baseline Monitoring Report

Analytical Retest for Zinc (Zn)

Southern Aluminum

Magnolia, AR

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: 1010010416
Customer Name : SOUTHERN ALUMINUM CO., INC.
Customer Number : 2754
Report Date : 10/28/10

Sample Date : 10/21/10
Sample Time : 1210
Sample Type : GRAB WATER
Sample From : WATER RACK

Collected By: LEON RYAN
Delivery By : COURIER
Work Order :
Purchase Order :

Laboratory Analysis

Analysis Date	Time	By	Parameter	Result	Notes	Quantity	Method	Quality Assurance Precision % RPD	Quality Assurance Accuracy % Recovery
10/27	1051	BGW	Zinc, Total	6380.00 ug/L			EPA 200.7	5.35	94.5 *

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

Environmental Services Com. y, Inc.
Northwest Branch
1107 Century
Springdale, AR 72764
Phone 479-750-1170 Fax:: 479-750-1172

CHAIN OF CUSTODY

Client Information		Project Information	
Company Name:	Southern Aluminum Co., Inc.	Permit/Project #:	
Address:	#5 Hwy 82 West	Purchase Order #:	
	Magnolia, AR 71753	Work Order #	
Telephone:	800-221-0408	Sampler Name(s):	Leon Ryan
Fax:	870-234-4665		
Contact:	Ms. Colleen Tuggle	and Signature(s):	
ESC Client Number:	2754		

Sample Identification		Sample Collection				Sample Containers				Requested Parameters
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#	Zinc (30.PS)
Water Rack	1010010416	10-21-10	12:10	Grab	Water	Plastic	1 Liter	HNO3	1	

	Date	Time		Date	Time	
Relinquished By: (Signature and Printed Name) Leon Ryan	10-21-10	12:10	Received By: (Signature and Printed Name) Cindy Strauss Cindy Strauss	10-25-10	0800	Custody Seals: Used? Intact?
Relinquished By: (Signature and Printed Name) Cindy Strauss Cindy Strauss	1025-10	0852	Received By: (Signature and Printed Name)	Date	Time	Turnaround: Regular Special
Relinquished By: (Signature and Printed Name)	Date	Time	Received for Lab By: (Signature and Printed Name)	10-25-10	0852	Were samples properly preserved: Yes No

All samples cooled to ≤ 6 deg C with ice.

Comments:

Flow Data	Field Test	Time	Analyst	Result	Result	Units
Analyst:	pH:					
Time:						
Reading:						
Units:						
Chlorinated? Y N	Fecal Start:			This Document is Page __ of __		

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

Southern Aluminum
P.O. Box 884
Magnolia, AR 71754

B. FACILITY & LOCATION ADDRESS

Southern Aluminum
5 Highway 82 West
Magnolia, AR 71753

C. FACILITY CONTACT: Colleen Tuggle **TELEPHONE NUMBER:** 870.234.8660 **e-mail:** ctuggle@southernaluminum.com

(2) REPORTING PERIOD--FISCAL YEAR From ??? to ???? (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

June & December

B. PERIOD COVERED BY THIS REPORT

FROM: December, 2009 TO: October, 2010

(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

Coating

*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.

This Semi-Annual Report is the initial Semi-Annual Report for this facility. Changes in regulated processes will be described in future reports.

C. Number of Regular Employees at this Facility 135

135

D. [Reserved]

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Ancillary)	15	15	Batch
Regulated (Cyanide)	0	0	N/A
§403.6(e) Unregulated*	0	0	N/A
§403.6(e) Dilute	0	0	N/A
Cooling Water**	0	0	N/A
Sanitary**	~500	~500	Do Not Commingle
Total Flow to POTW	515	515	**********

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

**Indicate if these Streams commingle with Regulated Streams BEFORE treatment

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM

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	0.0001	0.0074	0.069	0.00097	0.042	0.0001	5.02	0.1224	0.076
Ave Measured	0.0001	0.0074	0.069	0.00097	0.042	0.0001	5.02	0.1224	--

Sample Location Sample taken after final process in paintline/washtank just prior to discharge to municipal collection system.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency Collected One (1) collected 11-24-2009; Additional Sample Analyzed as required by this Report on 10-11-2010. Additional sample/analysis for Zinc 10-21-10.

40 CFR 136 Preservation and Analytical Methods Use: ■ Yes ☐ No

Indicate Combined Wastestream Factor if Dilution Streams Exist w/Regulated Streams N/A

(6) CERTIFICATION

A. Required under 40 CFR 403.12(g)

I certify under penalty of law that 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.

Leon M. Ryan
(Typed Name)

Vice President/General Manager
(Corporate Officer or authorized representative)

Date of Signature Leon Ryan 11 23 10

B. CHECK ONE: O '433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED G '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

Intentionally left blank

§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: None

(8) GENERAL COMMENTS

Flow Calculations:

Southern Aluminum batch discharges at a frequency of four (4) times per year. 1350 gallons are batch dumped to the Magnolia municipal sewer system once every three (3) month period.

Calculations:

Four (4) batch discharges X 1,350 gallons per discharge X 1 Year ÷ 365 days per year = 15 gallons per day (approximate)

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

40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: Southern Aluminum ARP001059

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.

Leon M. Ryan
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Leon M. Ryan
SIGNATURE

Vice President/General Manager
OFFICIAL TITLE

11-23-10
DATE SIGNED