

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*

10/18/2010

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

ALLEN GILLIAM
WATER DIVISION

Re: Southern Aluminum, ARP001059

Dear Mr. Gilliam,

Please refer to your September 16, 2010 letter and accept this submittal for the referenced facility located in Magnolia, Arkansas.

In this submittal you will find the following items:

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

The analytical results of the sample taken on 10/11/2010 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.

On 10-8-2010 a No Exposure Certification for storm water effects was sent to ADEQ by certified mail since no processes or materials are exposed to storm water at Southern Aluminum.

Please accept this information and contact me with questions.

Thank you.

Sincerely,

B.K. F.
Bernie K. Finch
Finch Environmental, PLC

RECEIVED
OCT 18 2010
32 2:09

Attachments

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

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

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 | ~1000 | Do Not Commingle |
| Total Flow to POTW | 515 | 1015 | ***** |

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

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

(5) MEASUREMENT OF POLLUTANTS

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 | 0.076 |

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.

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 _____

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 _____

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

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

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. Rvan
(Typed Name)
Vice President/General Manager
(Corporate Officer or authorized representative)

Date of Signature Leon Rvan 10/18/10

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.

[Signature]
(Typed Name)
(Corporate Officer or authorized representative)

Date of Signature _____

Intentionally left blank

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

Vice President/General Manager

OFFICIAL TITLE


SIGNATURE

10 - 18 - 10

DATE SIGNED

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

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 and TTOs listed at 40CFR433.11

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):

| | |
|-----------------|---|
| <u>Coating</u> | <u>Southern Aluminum purchases clean, dry wrapped Aluminum extrusions. Extrusions are bolted together and cut to size. Extrusions are hung on the paint line conveyor. Products are washed, rinsed and placed in a dry off oven at 400 degrees F. Products are then removed and sent to assembly.</u> |
| 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 |
|----------------------|--------------------------------|---------|----------|----------------------------|
| Coating | 40CFR433 | A | 2514 | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

*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 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.

(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:

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.

D. User Sample Location: Sample(s) are taken in 2050 gallon acid wash tank containing 35 gallons Steelcoat at 140 °F Spray

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 ___ NO ___

*Retest for Total Zinc will be submitted to the Control Authority (CA) within 30 days.

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 M. Ryan
Signature

Date 10 - 18 - 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 until compliance is possible.

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

Leon Ryan
Signature

10-18-10
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)

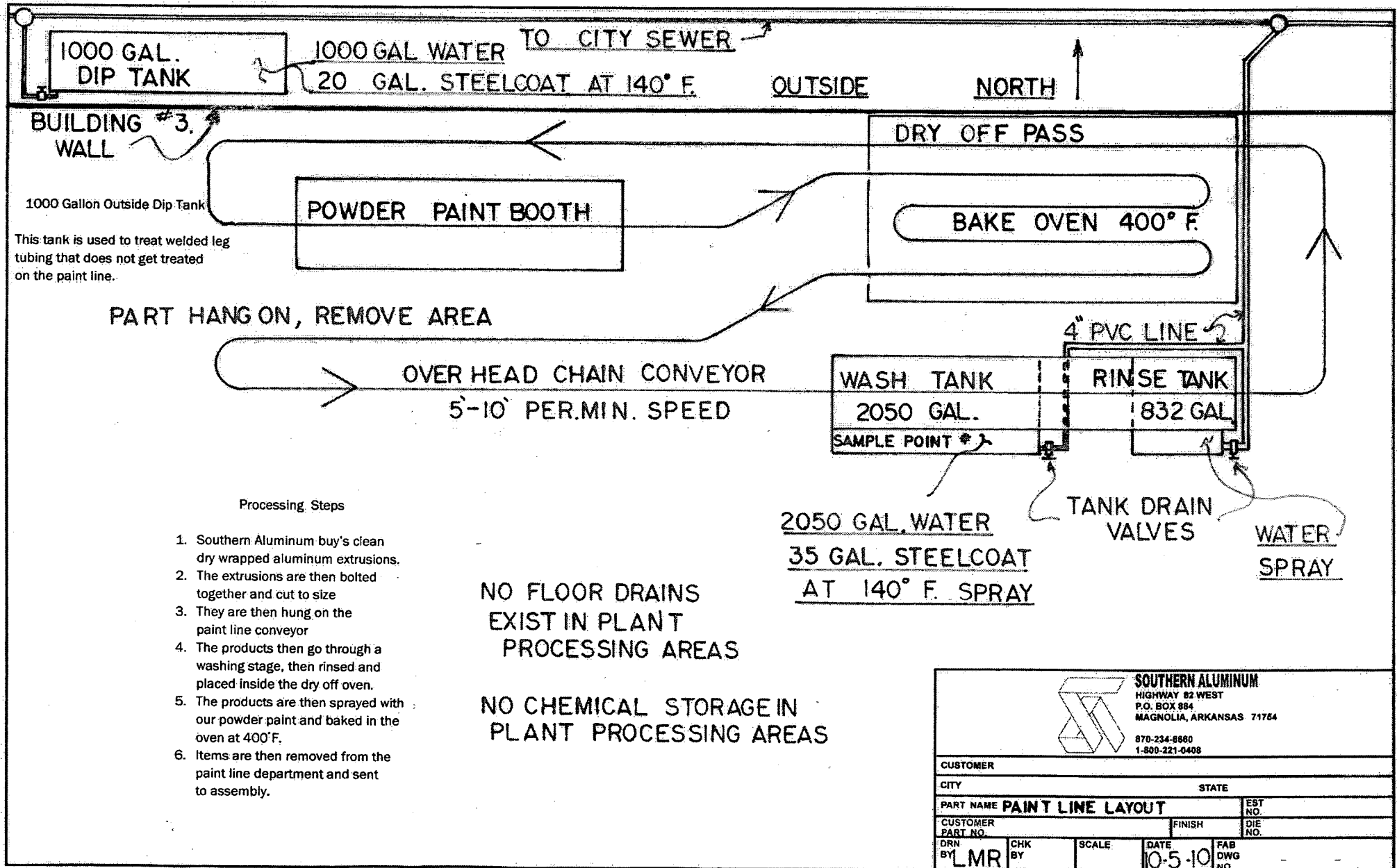
Vice President and General Manager
Official Title (Please Type or Print)

Leon Ryan
Signature

10-18-10
Date

Attachment 1

Process Schematic Drawing



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
870-234-8880
1-800-221-0408

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

Attachment 2

Analysis for Toxic Organics and Metals (40 CFR 433.11)

Environmental Services Company, Inc.



Corporate Office: 13715 West Markham
Little Rock, Arkansas 72211
Phone: 501-221-2565
Fax: 501-221-1341
Email: corporate@esclabs.com

Northwest Branch:
1107 Century Avenue
Springdale, Arkansas 72764
Phone: 479-750-1170
Fax: 479-750-1172
Email: nwbranch@esclabs.com

Web Site: www.esclabs.com

October 18, 2010

Mr. Bernie K. Finch
Finch Environmental, PLC
9 Heritage Park Circle
North Little Rock, AR 72116
Telephone/Facsimile: 501-771-6940
bkfinch@sbcglobal.net
www.finchenvironmental.com

Re: Southern Aluminum Company, Inc.

Dear Mr. Finch:

Thank you for allowing us to assist you and your client with analytical services. The final reports are attached. There are reports of the organics that comprise the Total Toxic Organics. No compounds were present above the listed detection limits. A few of the detection limits are above .01 mg/L, so the TTO summation number should be 0.076 mg/L.

Additionally, a standard lab report lists the wet chemistry and metals components of the testing. Of special interest are the zinc and pH results.

Finally, the chain of custody is attached. As you know, when the samples arrived at our lab, they were warm and the VOA vials had a small headspace. These conditions are noted on the chain.

Thank you for allowing us to serve you. We truly appreciate the opportunity.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Debra'.

Debra B. Woosley
Sr. Vice President



Environmental Services Company, Inc.

Corporate Office:
13715 West Markham; Little Rock, Arkansas 72211
Phone: 501-221-2565 Fax: 501-221-1341
Email: corporate@esclabs.com

Northwest Branch:
1107 Century Avenue; Springdale, Arkansas 72764
Phone: 479-750-1170 Fax: 479-750-1172
Email: nwbranch@esclabs.com

Web Site: www.esclabs.com

Report of Total Toxic Organics

Page 1 of 6

Client: Southern Aluminum Co., Inc.
Control Number: 1010010315 / 1010020198 Date Sampled: 10/11/10
Sample Type: Grab - Water Date Received: 10/12/10
Sample Identification: Water Rack Date Reported: 10/15/10

| Target Compound | Result ug/L (ppb) | Detection Limit |
|-----------------------------|-------------------|-----------------|
| Volatile Fraction | | |
| Acetone | ND | 3.72 |
| Acrolein | ND | 10.53 |
| Acrylonitrile | ND | 19.52 |
| Benzene | ND | 2.44 |
| Bromochloromethane | ND | 2.74 |
| Bromodichloromethane | ND | 1.88 |
| Bromoform | ND | 2.73 |
| Carbon Tetrachloride | ND | 5.44 |
| Chlorobenzene | ND | 2.97 |
| Chloroethane | ND | 1.50 |
| Chloroform | ND | 2.72 |
| Dibromochloromethane | ND | 1.99 |
| 1,2-Dibromo-3-chloropropane | ND | 6.90 |
| 1,2-Dibromoethane | ND | 2.54 |
| 1,2-Dichlorobenzene | ND | 3.45 |
| 1,4-Dichlorobenzene | ND | 3.36 |
| 1,1-Dichloroethane | ND | 2.57 |
| 1,2-Dichloroethane | ND | 2.73 |
| 1,1-Dichloroethene | ND | 2.75 |
| cis-1,2-Dichloroethene | ND | 2.55 |
| trans-1,2-Dichloroethene | ND | 2.55 |
| 1,2-Dichloropropane | ND | 2.85 |
| cis-1,3-Dichloropropene | ND | 2.53 |
| trans-1,3-Dichloropropene | ND | 2.74 |



Environmental Services Company, Inc.

Corporate Office:
13715 West Markham; Little Rock, Arkansas 72211
Phone: 501-221-2565 Fax: 501-221-1341
Email: corporate@esclabs.com

Northwest Branch:
1107 Century Avenue; Springdale, Arkansas 72764
Phone: 479-750-1170 Fax: 479-750-1172
Email: nwbranch@esclabs.com

Web Site: www.esclabs.com

| | | |
|-------------------------------------|----------------------------|---------------------|
| Client: Southern Aluminum Co., Inc. | Control Number: 1010010315 | Page Number: 2 of 6 |
|-------------------------------------|----------------------------|---------------------|

| Target Compound | Result ug/L (ppb) | Detection Limit |
|--------------------------------------|-------------------|-----------------|
| Volatile Fraction (continued) | | |
| Ethylbenzene | ND | 2.71 |
| 2-Hexanone | ND | 2.39 |
| Methyl Bromide | ND | 1.73 |
| Methyl Chloride | ND | 6.23 |
| Dibromomethane | ND | 1.84 |
| Methylene chloride | ND | 4.07 |
| 4-Methyl-2-pentanone (MIBK) | ND | 3.42 |
| Styrene | ND | 5.71 |
| 1,1,1,2-Tetrachloroethane | ND | 1.50 |
| 1,1,2,2,-Tetrachloroethane | ND | 3.43 |
| Tetrachloroethylene | ND | 3.06 |
| Toluene | ND | 2.09 |
| 1,1,1-Trichloroethane | ND | 2.38 |
| 1,1,2-Trichloroethane | ND | 2.71 |
| Trichloroethylene | ND | 2.96 |
| Trichlorofluoromethane | ND | 1.79 |
| 1,2,3-Trichloropropane | ND | 0.84 |
| 2-Chloroethyl vinyl ether | ND | 8.30 |
| Vinyl Acetate | ND | 2.54 |
| Vinyl Chloride | ND | 5.17 |
| Xylenes | ND | 5.40 |

| System Monitoring Compounds | % Recovery | % Recovery Limits |
|-----------------------------------|------------|-------------------|
| 1,2-Dichloroethane-d ₄ | 112.75 | 85-115 |
| Toluene-d ₈ | 95.48 | 85-115 |
| 4-Bromofluorobenzene | 98.32 | 85-115 |

A lab blank was monitored for all analytes of interest. The analysis was run per EPA Method 624.

Date of analysis: 10/13/10
Time of analysis: 11:45
Analyst: RHB



Environmental Services Company, Inc.

Corporate Office:
13715 West Markham; Little Rock, Arkansas 72211
Phone: 501-221-2565 Fax: 501-221-1341
Email: corporate@esclabs.com

Northwest Branch:
1107 Century Avenue; Springdale, Arkansas 72764
Phone: 479-750-1170 Fax: 479-750-1172
Email: nwbranch@esclabs.com

Web Site: www.esclabs.com

| | | |
|-------------------------------------|----------------------------|---------------------|
| Client: Southern Aluminum Co., Inc. | Control Number: 1010010315 | Page Number: 3 of 6 |
|-------------------------------------|----------------------------|---------------------|

| Target Compound | Result ug/L (ppb) | Detection Limit |
|--|-------------------|-----------------|
| Base/Neutral Extractable Fraction | | |
| Acenaphthene | ND | 3.52 |
| Acenaphthylene | ND | 3.30 |
| Anthracene | ND | 3.96 |
| Benzidine | ND | 3.81 |
| Benzo(a)anthracene | ND | 6.92 |
| Benzo(a)pyrene | ND | 5.44 |
| Benzo(b)fluoranthene | ND | 5.54 |
| Benzo(g,h,i)perylene | ND | 3.09 |
| Benzo(k)fluoranthene | ND | 5.54 |
| Bis (2-chloroethoxy) methane | ND | 2.86 |
| Bis (2-chloroethyl) ether | ND | 6.92 |
| Bis (2-chloroisopropyl) ether | ND | 1.99 |
| Bis (2-ethylhexyl) phthalate | ND | 2.68 |
| 4-Bromophenyl phenyl ether | ND | 3.41 |
| Butyl benzyl phthalate | ND | 17.71 |
| 2-Chloronaphthalene | ND | 2.60 |
| 4-chlorophenyl phenyl ether | ND | 3.06 |
| Chrysene | ND | 4.14 |
| Dibenzo(a,h)anthracene | ND | 7.86 |
| 1,2-Dichlorobenzene | ND | 2.94 |
| 1,3-Dichlorobenzene | ND | 3.25 |
| 1,4-Dichlorobenzene | ND | 3.25 |
| 3,3'-Dichlorobenzidine | ND | 1.79 |
| Diethyl phthalate | ND | 3.98 |
| Dimethyl phthalate | ND | 3.31 |
| Di-n-butyl phthalate | ND | 8.92 |
| 2,4-Dinitrotoluene | ND | 4.33 |
| 2,6-Dinitrotoluene | ND | 4.47 |



Environmental Services Company, Inc.

Corporate Office:
13715 West Markham; Little Rock, Arkansas 72211
Phone: 501-221-2565 Fax: 501-221-1341
Email: corporate@esclabs.com

Northwest Branch:
1107 Century Avenue; Springdale, Arkansas 72764
Phone: 479-750-1170 Fax: 479-750-1172
Email: nwbranch@esclabs.com

Web Site: www.esclabs.com

| | | |
|-------------------------------------|----------------------------|---------------------|
| Client: Southern Aluminum Co., Inc. | Control Number: 1010010315 | Page Number: 4 of 6 |
|-------------------------------------|----------------------------|---------------------|

| Target Compound | Result ug/L (ppb) | Detection Limit |
|-----------------|-------------------|-----------------|
|-----------------|-------------------|-----------------|

Base/Neutral Extractable Fraction (continued)

| | | |
|---------------------------|----|-------|
| Di-n-octylphthalate | ND | 6.75 |
| Fluroanthene | ND | 3.89 |
| Fluorene | ND | 3.45 |
| Hexachlorobenzene | ND | 5.04 |
| Hexachlorobutadiene | ND | 3.23 |
| Hexachlorocyclopentadiene | ND | 2.06 |
| Hexachloroethane | ND | 3.85 |
| Indeno (1,2,3-cd) pyrene | ND | 15.26 |
| Isophorone | ND | 4.04 |
| Naphthalene | ND | 3.07 |
| Nitrobenzene | ND | 3.78 |
| N-Nitrosodi-N-propylamine | ND | 3.49 |
| N-nitrosodimethylamine | ND | 2.16 |
| N-nitrosodiphenylamine | ND | 5.01 |
| Phenanthrene | ND | 5.53 |
| 1,2-Dephenylhydrazine | ND | 4.43 |
| Pyrene | ND | 4.46 |
| 1,2,4-Trichlorobenzene | ND | 3.75 |

| System Monitoring Compounds | % Recovery | % Recovery Limits |
|-----------------------------|------------|-------------------|
| Nitrobenzene-d ₅ | 94.74 | 52-105 |
| 2-Fluorobiphenyl | 85.14 | 60-118 |
| p-Terphenyl-d ₁₄ | 79.00 | 52-142 |

A lab blank was monitored for all analytes of interest. The analysis was run per EPA Method 625.

Date of analysis: 10/14/10
Time of analysis: 14:22
Analyst: RHB



Environmental Services Company, Inc.

Corporate Office:
13715 West Markham, Little Rock, Arkansas 72211
Phone: 501-221-2565 Fax: 501-221-1341
Email: corporate@esclabs.com

Northwest Branch:
1107 Century Avenue, Springdale, Arkansas 72764
Phone: 479-750-1170 Fax: 479-750-1172
Email: nwbranch@esclabs.com

Web Site: www.esclabs.com

| | | |
|-------------------------------------|----------------------------|---------------------|
| Client: Southern Aluminum Co., Inc. | Control Number: 1010010315 | Page Number: 5 of 6 |
|-------------------------------------|----------------------------|---------------------|

| Target Compound | Result ug/L (ppb) | Detection Limit |
|----------------------------------|-------------------|-----------------|
| Acid Extractable Fraction | | |
| 2-Chlorophenol | ND | 5.28 |
| 2,4-Dichlorophenol | ND | 13.11 |
| 2,4-Dimethylphenol | ND | 5.58 |
| 4,6-Dinitro-2-methylphenol | ND | 1.66 |
| 2,4-Dinitrophenol | ND | 2.65 |
| 2-Nitrophenol | ND | 6.47 |
| 4-Nitrophenol | ND | 7.07 |
| 4-Chloro-3-methylphenol | ND | 6.76 |
| Pentachlorophenol | ND | 2.70 |
| Phenol | ND | 5.82 |
| 2,4,6-Trichlorophenol | ND | 7.53 |

| System Monitoring Compounds | % Recovery | % Recovery Limits |
|-----------------------------|------------|-------------------|
| Phenol-d ₅ | 74.34 | 57-106 |
| 2-Fluorophenol | 76.11 | 50-99 |
| 2,4,6-Tribromophenol | 93.81 | 47-118 |

A lab blank was monitored for all analytes of interest. The analysis was run per EPA Method 625.

Date of analysis: 10/14/10
Time of analysis: 14:22
Analyst: RHB



Environmental Services Company, Inc.

Corporate Office:
 13715 West Markham; Little Rock, Arkansas 72211
 Phone: 501-221-2565 Fax: 501-221-1341
 Email: corporate@esclabs.com

Northwest Branch:
 1107 Century Avenue; Springdale, Arkansas 72764
 Phone: 479-750-1170 Fax: 479-750-1172
 Email: nwbranch@esclabs.com

Web Site: www.esclabs.com

| | | |
|-------------------------------------|----------------------------|---------------------|
| Client: Southern Aluminum Co., Inc. | Control Number: 1010010315 | Page Number: 6 of 6 |
|-------------------------------------|----------------------------|---------------------|

| Target Compound | Result ug/L (ppb) | Detection Limit |
|--------------------------------------|-------------------|-----------------|
| Chlorinated Pesticides/ PCB's | | |
| Aldrin | ND | 0.004 |
| alpha-BHC | ND | 0.004 |
| beta-BHC | ND | 0.004 |
| gamma-BHC | ND | 0.004 |
| delta-BHC | ND | 0.011 |
| Chlordane | ND | 0.100 |
| 4,4'-DDT | ND | 0.030 |
| 4,4'-DDE | ND | 0.005 |
| 4,4'-DDD | ND | 0.018 |
| Dieldrin | ND | 0.009 |
| alpha-Endosulfan | ND | 0.016 |
| beta-Endosulfan | ND | 0.248 |
| Endosulfan Sulfate | ND | 0.016 |
| Endrin | ND | 0.019 |
| Endrin Aldehyde | ND | 0.015 |
| Heptachlor | ND | 0.006 |
| Heptachlor epoxide | ND | 0.005 |
| Toxaphene | ND | 0.500 |
| PCB-1016 | ND | 0.050 |
| PCB-1221 | ND | 0.050 |
| PCB-1232 | ND | 0.050 |
| PCB-1242 | ND | 0.050 |
| PCB-1248 | ND | 0.050 |
| PCB-1254 | ND | 0.050 |
| PCB-1260 | ND | 0.050 |

| System Monitoring Compounds | % Recovery | %Recovery Limits |
|-----------------------------|------------|------------------|
| Tetrachloro-m-xylene | 103.47 | 35-138 |
| Decachlorobiphenyl | 110.40 | 43-128 |

A lab blank was monitored for all analytes of interest. The analysis was run per EPA Method 608.

Date of analysis: 10/14/10
 Time of analysis: 12:07
 Analyst: RHB

Certification

Data Release is authorized by:

Richard Brown

Richard Brown

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: 1010010315
 Customer Name : SOUTHERN ALUMINUM CO., INC.
 Customer Number : 2754
 Report Date : 10/15/10

Sample Date : 10/11/10
 Sample Time : 1454
 Sample Type : GRAB WATER
 Sample From : WATER RACK

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

Laboratory Analysis

| Analysis | | | | | | | Quality Assurance | | |
|----------|------|-----|-------------------------|----------------|-------|----------|-------------------|-----------|------------|
| Date | Time | By | Parameter | Result | Notes | Quantity | Method | Precision | Accuracy |
| | | | | | | | | % RPD | % Recovery |
| 10/14 | 1600 | NTR | Cyanide Total (as CN) | 0.1224 mg/L | | | SM 18th 4500-CN E | 1.61 | 104.1 * |
| 10/15 | 0530 | NTR | Oil & Grease, Total | 11.700 mg/L | | | EPA 1664 A | 0.52 | 97.0 * |
| 10/12 | 0720 | NTR | pH, Lab | 3.10 S.U. | | | EPA 150.1 | 0.27 | N/A * |
| 10/14 | 1535 | RE | Chromium | 7.3800 ug/L | | | EPA 200.8 | 0.81 | 106.0 |
| 10/12 | 1030 | NTR | Solids, Total Suspended | 25.00 mg/L | | | SM 18th 2540 D | 3.06 | N/A * |
| 10/14 | 1535 | RE | Nickel | 42.4000 ug/L | | | EPA 200.8 | 0.00 | 104.0 |
| 10/14 | 1535 | RE | Copper | 69.8000 ug/L | | | EPA 200.8 | 2.89 | 103.0 |
| 10/14 | 1535 | RE | Zinc | 5020.0000 ug/L | | | EPA 200.7 | 1.82 | 106.0 |
| 10/14 | 1535 | RE | Silver | < 0.1000 ug/L | | | EPA 200.8 | 0.69 | 100.0 |
| 10/14 | 1535 | RE | Cadmium | 4.9200 ug/L | | | EPA 200.8 | 3.33 | 100.0 |
| 10/14 | 1535 | RE | Lead | 0.9680 ug/L | | | EPA 200.8 | 0.18 | 99.0 |

* 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 Ned R. Ryerson
 Environmental Services Co., Inc.