

Gilliam, Allen

From: Gilliam, Allen
Sent: Monday, October 25, 2010 11:22 AM
To: Colleen Tuggle; Leon Ryan
Cc: 'Bernie K. Finch'; Anderson, Alan
Subject: AR0043613_Southern Aluminum (ARP001059) Baseline Monitoring Report & late 10/10 Semi-Annual Report Reply_20101015

Mr. Ryan,

Your Baseline Monitoring Report (BMR) and first semi-annual report were received on 10/18/10 via Finch Environmental.

This office has the following comments regarding these two reports.

On the BMR:

1) Please provide a more complete list of raw materials. There's no other steel, galvanized or zinc coated nuts, bolts, washers, end/bottom caps, supports etc brought in for assembly of a finished table? Mill Aluminum 6063 Alloy cannot be the only raw material purchased for your end-product.

Other raw materials such as a listing of chemicals used in the processing and manufacturing areas is also desired. There's no lube or chain (conveyor) oils, solvents, cutting or cooling oils present in the facility? The first page of any chemical material safety data sheets (MSDS) would be all that's requested. It's mentioned "phosphatizing process" in a different section. This and any other cleaning acids, caustics used prior to painting should have also been mentioned as raw materials with MSDS included. Paint(s) should also be listed with their MSDS' first page.

Schematic/sampling point confusion:

2) A "1000 GAL dip tank" w/ valve is shown on the NW side of the bldg. What flows into (or out of) this tank? What's its purpose?

There are two circles (connections?) drawn on the east/west running "city sewer" line. One at the NW corner and one at the NE corner. It appears the wash and rinse tank wastewaters (your only two regulated streams) are connected to the city at the NE corner. Please clarify on revised schematic with flow direction and a brief narrative in your BMR describing your regulated flows from generation to its disposal site. You do not have a very complex process with a myriad of flow-lines or chemicals. The wastewater flow narrative should follow very easily what's depicted on the schematic.

3) You've denoted (penciled in) a sampling point at/on the valved 2050 GAL "Wash Tank". This office assumes the phosphatizing occurs in this tank. Wastewater from the next 832 gallon rinse tank is also regulated under the metal finishing regulations in 40 CFR 433.17. Is it ever discharged? Then, it must also be sampled/analyzed for compliance purposes.

The sample location from where the lab sample was grabbed says "water rack". This is not located on the schematic and the BMR states, "sample taken after final process [which would be the rinse tank] in paintline/washtank just prior to discharge..." so I'm unsure of your sampling point and what was collected.

Analyticals and violation of Zn limit:

4) pH readings must be captured "in the field" as a grab. The analytical result your lab reported is null and void as pH has a holding time of 15 minutes and it appears they didn't analyze for pH until the day after sampling. Your lab should have made note of this or notified you would have to analyze for your own pH for immediate results.

Zn, again violated the metal finishing limits in 40 CFR 433.17. Your consultant, Mr. Finch indicated he was going to have you follow the correct procedures in 40 CFR 401.12(g) (b) by analyzing and submitting another report with a certification statement within 30

days.

Warnings from your lab indicated the samples were "warm" and there was headspace in the volatile organic vials. This may have caused false readings. Did you not receive brief instructions on sampling techniques?

Semi-Annual Report

5) Since you're batch discharging, please report as such. For example: 350 gal batch discharged once/week, etc. These batches can be averaged over your six (6) reporting period. Please explain how you've come up the estimates.

Thank you for your attempt to come back into compliance. This office will conclude the reports were received, but not complete nor compliant. Please resubmit within thirty (30) days a more comprehensive BMR and a re-submittal of your Zn analysis with certification statements.

Sincerely

Allen Gilliam
ADEQ State Pretreatment Coordinator
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