

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*

12/4/2018

Mr. Adam Yates
Engineer
Pretreatment Coordinator
Water Division
ADEQ
5301 Northshore Drive
North Little Rock, AR 72118

Re: Southern Aluminum Manufacturing Acquisition, Inc., Pretreatment Tracking Number
ARP001059

Dear Mr. Yates,

Please accept this letter of notification involving changing the volume and character of pollutants being introduced into the City of Magnolia municipal collection system.

Currently, a single core process, the "rinse tank" is discharged to the City of Magnolia once each production day with an analysis completed each six-month period to confirm compliance with 40 CFR 433.17 PSNS. Laboratory results are attached to the Semi-Annual Report form each six-month calendar period and submitted to ADEQ. The City of Magnolia receives a copy of the Semi-Annual Report, the laboratory analytical results, and the laboratory chain of custody form.

Southern Aluminum Manufacturing Acquisition Company wishes to re-establish a core process, that of the "wash tank", to the wastewater being discharged to the City of Magnolia sanitary sewer collection system. This tank was previously authorized for indirect discharge until the current process configuration which utilizes only the "rinse tank" as a core process with an indirect discharge to the City.

As with the rinse tank a laboratory sample will be taken each six-month period from the "wash tank" to demonstrate compliance with 40 CFR Part 433.17 PSNS. The plant anticipates discharging once every 180 days. The volume of the "wash tank" is 1800 gallons.

The contents of the "wash tank" demonstrate compliance with all regulated metals and cyanide (40 CFR 433.17 – PSNS (see attached analytical laboratory report from a sample from this tank analyzed by Environmental Services Company). Future Semi-Annual Reports will reflect two core process sources, the "rinse tank" and the "wash tank". This change is desired to enhance operations at the plant. Please see attached process water flow schematic.

Southern Aluminum Manufacturing Acquisition Company will sample once per six-month period from the "rinse tank" and the "wash tank" (January 1 - June 30 and July 1 - December 31, respectively) consistent with 40 CFR 433.17 PSNS and submit Semi-Annual Reports for each semi-annual period to ADEQ. The City of Magnolia can expect discharges on a (production) daily basis from the "rinse tank" as before and from the "wash tank" approximately once every 180 days. No other changes in plant operation or discharge are proposed.

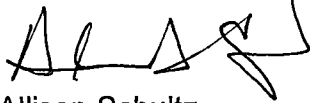
Please accept this submittal and contact me with questions.

Thank you.

Sincerely,



Bernie K. Finch
Finch Environmental, PLC

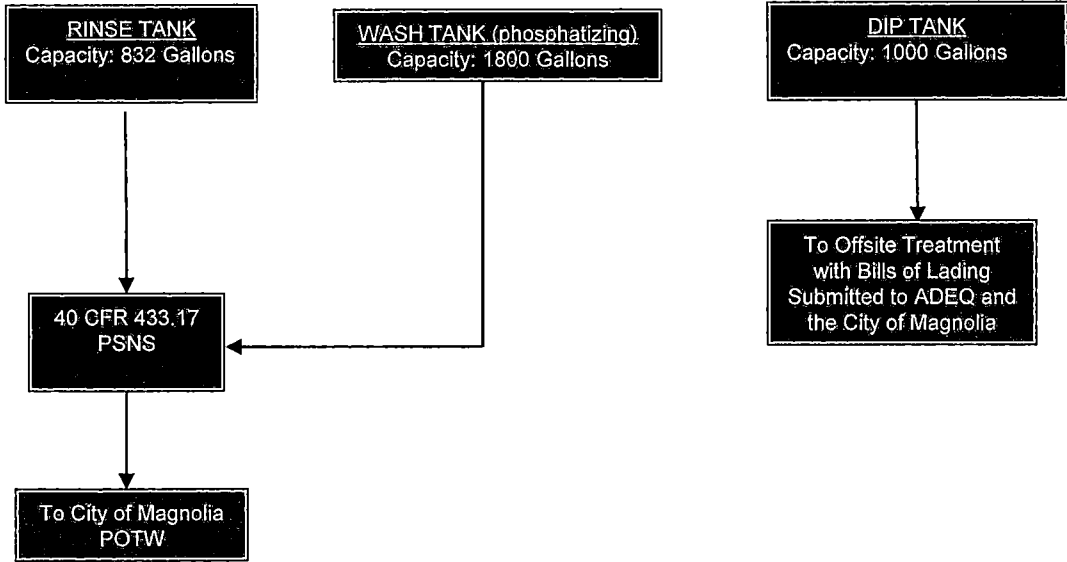


Allison Schultz
President and Chief Operating Officer
Southern Aluminum Manufacturing Acquisition Company, Inc.

Cc Russell Thomas
Water and Wastewater Manager
City of Magnolia
P.O. Box 666
Magnolia, AR 71753

Attachments

Southern Aluminum Manufacturing Acquisition Company, Inc.
Process Schematic of Water Flow
With Tank Capacity
Utilizing Zirconium Phosphate Chemistry



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9 Heritage Park Circle
North Little Rock, AR 72116

Southern Aluminum
Manufacturing Acquisition Company, Inc.
Magnolia, Arkansas

November 2018
Sheet 1 of 1

Environmental Services Company, Inc.

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

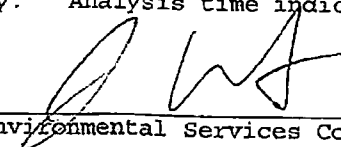
Northwest Arkansas Branch
 1107 Century Avenue
 Springdale, AR 72762
 Tel. (479)750-1170 Fax (479)750-1172

Control Number: 1809010314	Sample Date : 09/11/18	Collected By: TOBY DAVIS
Customer Name : SOUTHERN ALUMINUM CO. (SPECIAL)	Sample Time : 1435	Delivery By : UPS
Customer Number : 4317	Sample Type : GRAB WATER	Work Order :
Report Date : 09/28/18	Sample From : SOUTHERN ALUMINUM	Purchase Order :

<u>Laboratory Analysis</u>						<u>Quality Assurance</u>				
<u>Analysis</u>	<u>Date</u>	<u>Time</u>	<u>By</u>	<u>Parameter</u>	<u>Result</u>	<u>Notes</u>	<u>Quantity</u>	<u>Method</u>	<u>Precision</u>	<u>Accuracy</u>
									<u>% RPD</u>	<u>% Recovery</u>
	09/12	1100	NTR	Cyanide Total (as CN)	< 0.0100 mg/L			SM 1999 4500-CN E	1.08	91.9 *
	09/12	1700	PJC	Chromium	5.74 ug/L			EPA 200.8	0.00	101.2
	09/12	1700	PJC	Nickel	11.38 ug/L			EPA 200.8	0.00	102.4
	09/12	1700	PJC	Copper	15.40 ug/L			EPA 200.8	1.03	101.5
	09/19	1000	PJC	Zinc	271.63 ug/L			EPA 200.8	2.04	109.2
	09/12	1700	PJC	Silver	44.6 ug/L			EPA 200.8	0.00	99.4
	09/12	1700	PJC	Cadmium	< 4.00 ug/L			EPA 200.8	5.83	105.7
	09/12	1700	PJC	Lead	< 10.00 ug/L			EPA 200.8	0.98	106.3

* 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.

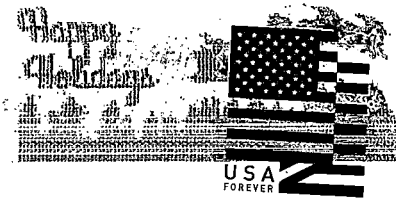
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LITTLE ROCK AR 722

10 DEC 2019 PM 3 1



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72116-531799

