

## **Peltier, Hannah**

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**From:** Gilliam, Allen  
**Sent:** Tuesday, January 06, 2015 3:03 PM  
**To:** leon ryan; Colleen Tuggle (ctuggle@southernaluminum.com)  
**Cc:** Fuller, Kim; Peltier, Hannah; magnolia russell thomas  
**Subject:** AR0043613\_Southern Aluminum ARP001059 Dec 2014 semi-annual Pretreatment report with ADEQ reply\_20150106  
**Attachments:** Southern Aluminum's Dec 2014 Semi-Annual Report.PDF

Leon and/or Colleen,

Southern Aluminum's December 2014 semi-annual Pretreatment report was received, reviewed, deemed complete and compliant with the Federal Pretreatment reporting requirements in 40 CFR 403.12(e) and more specifically in compliance with the Metal Finishing standards in 40 CFR 433.17.

No further actions are deemed necessary at this time, but you might want to watch your dump cycles' frequency as the Zn levels reported for December were slightly elevated over the last three (3) reports dating back to 12/13.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Russell Thomas, Magnolia Wastewater Manager  
Bernie Finch, Finch Environmental, Engineering Consultant to Southern Aluminum

E/NPDES/NPDES/Pretreatment/Reports

CGIOT

**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

12/23/2014

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

**RECEIVED**  
JAN 1 2015

13 895 LP  
complete/compliant  
no action necessary  
(watch Zn levels)  
AG

Re: Southern Aluminum, Pretreatment Tracking Number ARP001059

Dear Mr. Gilliam,

Please accept the following document and supporting attachments for the referenced facility located in Magnolia, Arkansas.

In this submittal you will find the following items:

1. Semi-Annual Report for Industrial Users Regulated by 40 CFR 433; and
2. The results of a sample of the regulated waste streams analyzed for Metals and Cyanide during the period beginning 07/01/2014 and ending 12/31/2014;

Analytical results of the sample taken on 12/10/2014 indicated no excursions of the daily maximum or monthly average pretreatment standards for new sources (PSNS) for metals and Cyanide.

Additionally, pH was analyzed and found to be 6.8 s.u. Southern Aluminum continues to analyze pH each time a batch discharge occurs from any regulated source and log this value.

As required by regulations the City of Magnolia is being provided a copy of this communication and supporting documentation.

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/attachments)  
Russell Thomas, City of Magnolia (w/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**

<p><b>A. LEGAL NAME &amp; MAILING ADDRESS</b></p> <p>Southern Aluminum P.O. Box 884 Magnolia, AR 71754</p>	<p><b>B. FACILITY &amp; LOCATION ADDRESS</b></p> <p>Southern Aluminum 5 Highway 82 West Magnolia, AR 71753</p>
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**C. FACILITY CONTACT:** Colleen Tuggle      **TELEPHONE NUMBER:** 870.234.8660      **e-mail:** tuggle@southernaluminum.com

**(2) REPORTING PERIOD--FISCAL YEAR 2014 (Both Semi-Annual Reports must cover Fiscal Year)**

<p><b>A. MONTHS WHICH REPORTS ARE DUE</b></p> <p>July and January for each semi-annual reporting period.</p>	<p><b>B. PERIODS COVERED BY THIS REPORT</b></p> <p><b>FROM:</b> July 1, 2014      <b>TO:</b> December 31, 2014</p>
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**(3) DESCRIPTION OF OPERATION**

<p><b>A. REGULATED PROCESSES</b></p> <p><u><b>CORE PROCESS(ES)</b></u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><b>G</b> Electroplating <b>G</b> Electroless Plating <b>G</b> Anodizing <b>O</b> Coating <b>G</b> Chemical Etching and Milling <b>G</b> Printed Circuit Board Manufacture</p> <p><u><b>ANCILLARY PROCESS(ES)*</b></u></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p><u>Coating</u></p> <p><u>Cleaning</u></p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>	<p><b>B. CHANGES:</b>      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.</p> <p>None .</p>
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\*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

<p><b>C. Number of Regular Employees at this Facility</b> 135</p> <p>135</p>	<p><b>D. [Reserved]</b></p>
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**(4) FLOW MEASUREMENT****INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY**

Process	Average	Maximum	Type of
Regulated (Core & Ancillary)	See note below	See note below	2882
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**	0	0	N/A
Total Flow to POTW	See note below	See note below	2882

\*"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	0.007	0.007	0.052	0.0005	0.0053	0.015	1.34	0.01	N/A
Ave Measured	0.007	0.007	0.052	0.0005	0.0053	0.015	1.34	0.01	--

Sample Location Flow-weighted composite samples taken of wash tank and rinse tank contributions commingled prior to discharge to municipal collection system. Dip tank did not discharge during the period 07-01-2014 through 12-31-2014.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency One (1) sample collected 12-10-2014


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**

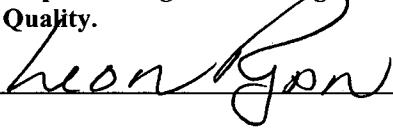
A. Required under 40 CFR 403.12(g)

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)

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.

Leon M. Ryan   
(Typed Name)  
Vice President/General Manager  
(Corporate Officer or authorized representative)

Date of Signature 12-29-14

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 (Discharge)**

Southern Aluminum batch discharges to the City of Magnolia POTW in the following manner:

Rinse Tank (Capacity: 832 gallons)

Wash Tank (Capacity: 2050 gallons)

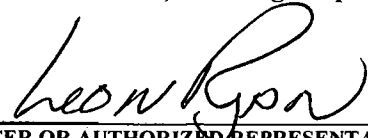
Dip Tank (Capacity: 1000 gallons)\*

\* Dip Tank did not discharge during the period beginning 07-01-2014 and ending 12-31-2014

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

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 Ryan  
SIGNATURE

12-29-14  
DATE SIGNED

Vice President/General Manager  
OFFICIAL TITLE



# 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: 1412010430	Sample Date : 12/10/14	Collected By: JF/CT
Customer Name : SOUTHERN ALUMINUM CO., INC.	Sample Time : 1300	Delivery By : UPS
Customer Number : 2754	Sample Type : GRAB WATER	Work Order :
Report Date : 12/19/14	Sample From :	Purchase Order :

### Laboratory Analysis

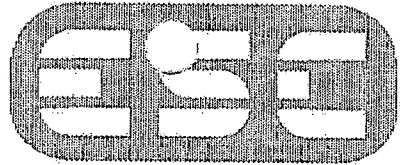
Analysis							Quality Assurance		
Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
12/16	0700	NTR	Cyanide Total (as CN)	< 0.0100 mg/L			SM 1999 4500-CN E	2.74	96.1
12/17	1703	RAH	Chromium	8.00 ug/L			EPA 200.8	0.18	100.1 *
12/17	1703	RAH	Nickel	15.00 ug/L			EPA 200.8	0.49	98.1 *
12/17	1703	RAH	Copper	52.00 ug/L			EPA 200.8	0.71	95.6 *
12/17	1703	RAH	Zinc	1341.00 ug/L			EPA 200.8	0.94	98.8 *
12/17	1703	RAH	Silver	< 0.50 ug/L			EPA 200.8	0.30	95.6 *
12/17	1703	RAH	Cadmium	7.00 ug/L			EPA 200.8	1.53	100.9 *
12/17	1703	RAH	Lead	< 0.50 ug/L			EPA 200.8	0.46	97.9 *

\* 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 *Neil J. Pyle*  
 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 #:															
Address:		#5 Hwy 82 West Magnolia, AR 71753		Purchase Order #:															
Telephone:		800-221-0408		Work Order #:															
Fax:		870-234-4665		Sampler Name(s):		Jeff Farrar Colleen Tuggle													
Contact:		Ms. Colleen Tuggle		and Signature(s):		Jeff Farrar Colleen Tuggle													
ESC Client Number:		2754																	
Sample Identification		Sample Collection				Sample Containers				Cyanide(%)	Metals (See Comments)								
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#										
	1412010430	12-10-14	1:00pm	Grab	Water	Plastic	1 Liter	NaOH+Ascorbic	1	X									
		12-10-14	1:00pm	Grab	Water	Plastic	8 oz	HNO3 to pH <2*	1	X									
Relinquished By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Custody Seals:											
Jeff Farrar JEFF FARRAR		12-10-14	1:10 pm	Vicki UPS		12-12-14	1030	Used? <input type="checkbox"/> Intact? <input type="checkbox"/>											
Colleen Tuggle C. Tuggle		12-10-14	1:10 pm	Michelle Twa Hall		12-12-14	1030	Turnaround: Regular <input type="checkbox"/> Special <input type="checkbox"/>											
Michelle Twa Hall		12-12-14	1045	Michelle Twa Hall		12-12-14	1045	Were samples properly preserved: Yes <input type="checkbox"/> No <input type="checkbox"/>											
Comments:		Cd(48.PS), Cr(24.PS), Cu(29.PS), Pb(82.PS), Ni(28.PS), Ag(47.PS), Zn(30.PS)		Flow Data		Field Test		Time		Analyst		Result		Result		Units			
				Analyst:		pH: 6.8		1:00 pm											
				Time:															
				Reading:															
				Units:															
* Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.						Fecal Start:				This Document is Page ___ of ___									

CSA

Finch Environmental, PLC

9 Heritage Park Circle

North Little Rock, AR 72116



Mr. Allen Gilliam

Pretreatment Coordinator

ADEQ

5301 Northshore Drive

North Little Rock, AR 72118

7211805617 R015

