

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*

1/20/2012

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

Re: Southern Aluminum Company, Inc., Pretreatment Tracking Number ARP001059

Dear Mr. Gilliam,

Please accept this letter and please consider it a corrective action plan for the referenced facility located in Magnolia, Arkansas.

Also, please reference your e-mail dated January 12, 2012 to Mr. Leon Ryan of Southern Aluminum Company, Inc.

As indicated in your e-mail the issues are:

1. Federal Metal Finishing Standards (40 CFR 433.17) for zinc (total);
2. Reporting Requirements (40 CFR 403.12 (g)); and
3. Regulations Pertaining to 40 CFR Part 136.

Federal Metal Finishing Standards (40 CFR 433.17)

Southern Aluminum has initiated an additional sampling effort to analyze process water for concentration of zinc (total). The sample will be taken, based on a theoretical batch discharge (even though no discharge to the municipal collection system will occur), with the sample analyzed for zinc (total). This will hopefully help determine whether the concentration of zinc reported in our recent Semi-Annual Report (2.06 mg/l) is truly representative of the concentration of zinc in our discharge. This concentration exceeded the monthly average concentration allowed (1.48 mg/l), but did not exceed the daily maximum limit (2.61 mg/l) found at 40 CFR 433.17. Since the plant only samples once during each batch discharge event an additional sample was not taken and analyzed. Therefore, our single sample was compared to the monthly average limit as well as the daily maximum limit. In the event the analytical result from the latest sample indicates that the previous analytical result is indeed representative of the concentration of zinc in the discharge, we will explore efforts to remove zinc concentrations to regulatory compliant levels. As soon as analytical results are available the results will be forwarded to your office for your review.

Federal Reporting Requirements (40 CFR 403.12 (g))

As you know our discharge is considered a batch discharge instead of a continuous discharge. Since we obtained only one sample during this batch discharge event we had no opportunity to obtain another sample. However, not notifying your office of the exceedance within twenty-four (24) hours was simply an oversight, and will not reoccur.

Regulations Pertaining to 40 CFR Part 136.

The plant has a calibrated pH probe to provide an instantaneous measurement for pH as required by 40 CFR Part 136. A protocol has been established so that in the future pH will be measured on an instantaneous basis with the value recorded on the chain of custody form which accompanies the sample taken.

Please accept this submittal and contact me with questions.

Thank you.

Sincerely,

B.K. F

Bernie K. Finch
Finch Environmental, PLC

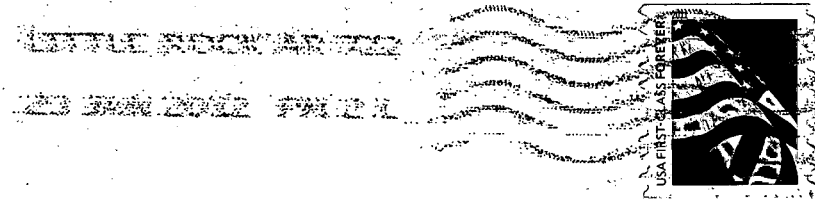


Leon M. Ryan
Vice President/General Manager
Southern Aluminum Company, Inc.

Cc Colleen Tuggle, Southern Aluminum



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

7211635317

