

AKORH AG

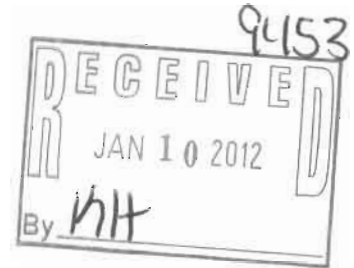
Finch Environmental, PLC

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

1/5/2012

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



Re: Southern Aluminum, Pretreatment Tracking Number ARP001059

Dear Mr. Gilliam,

Zn monthly avg limit violation. Sent email to L. Ryan w/ SA stating they were SNC. AE

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;
2. Schematic drawing of the process at Southern Aluminum;
3. The results of a sample of the regulated waste streams analyzed for Metals; and Cyanide

The analytical results of the sample taken on 11/08/2011 indicated no excursions of the daily maximum pretreatment standards for new sources (PSNS) for metals and Cyanide. The results did indicate an excursion of the monthly average pretreatment standards for new sources (PSNS) for Zinc (2.065 mg/l reported, NSPS for Zinc 1.48 mg/l (monthly average)). The plant intends to take more than one sample during the next semi-annual reporting period and have it analyzed for Zinc to establish a more representative measurement for Zinc.

Additionally, pH was analyzed and found to be 4.14 s.u. Southern Aluminum continues to analyze pH each time a batch discharge occurs and log this value. Southern Aluminum is exploring methods of pH adjustment to comply with a limit to be imposed by the municipal POTW.

As required by regulations the City of Magnolia is being notified of this issue.

Please accept this information and contact me with questions.

Thank you.

Sincerely,

Handwritten signature of Bernie K. Finch in black ink.

Bernie K. Finch
Finch Environmental, PLC

Attachment

Cc Colleen Tuggle, Southern Aluminum (w/attachments)
Russell Thomas, City of Magnolia (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
ctuggle@southernaluminum.com

TELEPHONE NUMBER: 870.234.8660 e-mail:

(2) REPORTING PERIOD--FISCAL YEAR 2010 (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

July & January

B. PERIOD COVERED BY THIS REPORT

FROM: July 1, 2011 **TO:** December 31, 2011

(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 _____

Cleaning _____

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.

*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

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)	See Note Below	See Note Below	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**	0	0	N/A
Total Flow to POTW	See Note Below	See Note Below	1350 Batch Discharge 4 Times Per Year

Note: 3 to 4 batch discharges to the POTW occur each year, 1350 gallons per batch.

**"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	0.001	0.029	0.002	0.042	0.001	2.065	0.01	TOMP (N/A)
Ave Measured	0.0001	0.001	0.029	0.002	0.042	0.001	2.065	0.01	TOMP (N/A)

Sample Location Sample taken at recently plumbed confluence of all three (3) regulated processes (Dip Tank, Wash Tank and Rinse Tank) immediately preceding discharge to municipal collection system.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency Collected One (1) collected 11-08-2011;

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)

**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: Initial submittal of a Toxic Organic Management Plan (TOMP).

(8) GENERAL COMMENTS

Flow Calculations:

Southern Aluminum batch discharges at a frequency of four (4) times per year. 1350 gallons are batch dumped to the Magnolia municipal sewer system once every three (3) month period.

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

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 *Leon Ryan*
(Typed Name)

Vice President/General Manager
(Corporate Officer or authorized representative)

Date of Signature 1 - 4 - 12

B. CHECK ONE: 433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED 433.12(a) TTO CERTIFICATION PROVIDED BELOW

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 *Leon Ryan*
(Typed Name)

Vice President/General Manager
(Corporate Officer or authorized representative)

Date of Signature 1 - 4 - 12

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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



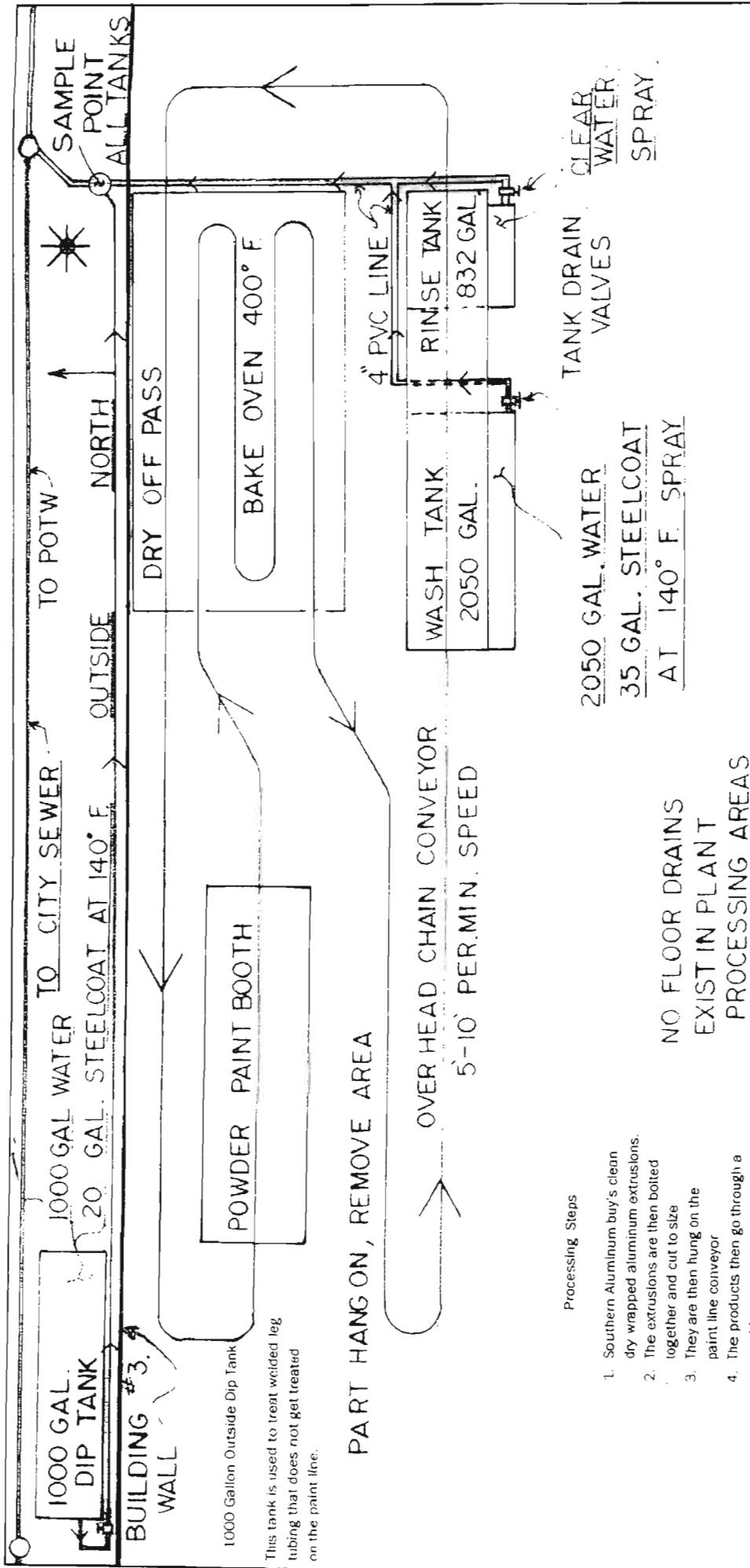
SIGNATURE

Vice President/General Manager

OFFICIAL TITLE

1 - 4 - 12

DATE SIGNED



		SOUTHERN ALUMINUM HIGHWAY 82 WEST P.O. BOX 884 MAGNOLIA, ARKANSAS 71754 870-234-8600 1-800-221-0408	
		CUSTOMER	STATE
PART NAME		PAINT LINE LAYOUT	
CITY	CITY	FINISH	EST. NO.
CUSTOMER PART NO.	CUSTOMER PART NO.	DATE	DWG. NO.
CHK BY	SCALE	DATE	PAB NO.
LMR		10-5-10	DWG. NO.

- 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

2050 GAL. WATER AT 140° F. SPRAY

35 GAL. STEELCOAT

TANK DRAIN VALVES CLEAR WATER SPRAY

TO POTW

TO CITY SEWER

1000 GAL. WATER

20 GAL. STEELCOAT AT 140° F

OUTSIDE

NORTH

DRY OFF PASS

BAKE OVEN 400° F

4" PVC LINE

WASH TANK 2050 GAL.

RINSE TANK 832 GAL.

POWDER PAINT BOOTH

OVER HEAD CHAIN CONVEYOR 5-10 PER MIN. SPEED

PART HANG ON, REMOVE AREA

NO FLOOR DRAINS EXIST IN PLANT PROCESSING AREAS

NO CHEMICAL STORAGE IN PLANT PROCESSING AREAS

2050 GAL. WATER AT 140° F. SPRAY

35 GAL. STEELCOAT

TANK DRAIN VALVES CLEAR WATER SPRAY

SAMPLE POINT ALL TANKS

1000 GAL. DIP TANK

BUILDING WALL

1000 Gallon Outside Dip Tank

This tank is used to treat welded leg tubing that does not get treated on the paint line.

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: 1111010233
 Customer Name: SOUTHERN ALUMINUM CO., INC.
 Customer Number: 2754
 Report Date: 11/29/11

Sample Date: 11/08/11
 Sample Time: 1500
 Sample Type: GRAB WATER
 Sample From: SAMPLE

Collected By: COLLEEN TUGGLE
 Delivery By: UPS
 Work Order:
 Purchase Order:

Laboratory Analysis

Analysis		Laboratory Analysis		Quality Assurance				
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
11/14	1520 NTR	Cyanide Total (as CN)	< 0.1000 mg/L			SM 18th 4500-CN E	3.95	94.4
11/09	1100 NTR	pH, Lab	4.14 S.U.			EPA 150.1	0.44	N/A *
11/23	1800 RAH	Chromium	< 1.00 ug/L			EPA 200.8	12.18	84.0 *
11/23	1800 RAH	Nickel	42.00 ug/L			EPA 200.8	12.20	84.0 *
11/23	1800 RAH	Copper	29.70 ug/L			EPA 200.8	11.01	84.0 *
11/23	1800 RAH	Zinc	2065.00 ug/L			EPA 200.8	23.44	91.5 *
11/23	1800 RAH	Silver	< 1.00 ug/L			EPA 200.8	9.41	82.0 *
11/23	1800 RAH	Cadmium	< 0.10 ug/L			EPA 200.8	10.59	83.0 *
11/23	1800 RAH	Lead	1.98 ug/L			EPA 200.8	11.61	82.0 *

* 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 Deb Wooley
 Environmental Services Co., Inc.