

Gilliam, Allen

From: Gilliam, Allen
Sent: Thursday, January 12, 2012 3:35 PM
To: Leon Ryan (lryan@southernaluminum.com)
Cc: 'Bernie K. Finch'; 'mwws@sbcglobal.net'; Henderson, Katie; Colleen Tuggle (ctuggle@southernaluminum.com)
Subject: AR0043613_Southern Aluminum ARP001059 Jan 2012 semi annual report and notification of violation reply_20120112

Mr. Ryan,

Your January 2012 semi-annual Pretreatment Report was received on 1/10/12. Per the statement on the cover letter provided by Finch Environmental and the analytical results (for Zinc) attached to the report, Southern Aluminum (SA) meets the significant non-compliance (SNC) criteria in 40 CFR 403.8(f)(8)(vii), "[SA] is in significant noncompliance if its violation meets one or more of the following criteria:

- (A) Chronic violations of wastewater Discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement..."

The Federal Metal Finishing standards SA is covered under (40 CFR 433.17) has a Zinc monthly average not to exceed of 1.48 mg/l. SA's Zinc analysis results indicated an excursion of that federal limit at 2.06 mg/l.

SA is also in violation of 40 CFR 403.12 (g), "Monitoring and analysis to demonstrate continued compliance...(2) If sampling performed by [SA] indicates a violation, [SA] shall notify [ADEQ] within 24 hours of becoming aware of the violation. [SA] shall also repeat the sampling and analysis and submit the results of the repeat analysis to [ADEQ] within 30 days after becoming aware of the violation..."

The notification of violation was not submitted to ADEQ within 24 hours and this office has no documentation of a submission of repeated sampling and analysis. The lab results report date is 11/29/11 and this office is assuming you saw them shortly thereafter having ample opportunity to achieve the preceding requirements.

This office realizes it has only been two (2) months since your last batch discharge, but as soon as your process wastewater is ready to be discharged, submit another zinc analysis to this office. If Zinc still exceeds the monthly average of 1.48 mg/l, include a comprehensive corrective action plan, continue sampling every batch discharge and submit reports within thirty (30) days until the Zinc excursions are rectified.

Comments:

- 1) Since you are batch discharging your regulated wastewater approximately 4 times per year, it is hoped you are collecting several grab samples over the period of discharge to the city. These grab samples should be equally spaced over the time of flow to get the most representative sample to be composited by your certified lab;
- 2) Per 40 CFR 136 pH samples virtually have no "holding time" before analysis; 15 minutes being the maximum. Since the samples were taken on 11/8/11 at 3 p.m. and the lab analyzed for pH on 11/9/11 at 11 a.m., the pH results sent in with your semi-annual report will be considered null and void. SA should invest in an inexpensive pH meter which can easily be calibrated on-site. The Pretreatment Regulations at 40 CFR 403.5(b)(2) have a pH (lower) limit of 5 standard units. I believe the City's industrial user pH limits are 6 to 9 s.u.; and
- 3) Please submit the lab's chain of custody with each semi-annual report.

If you have any questions or concerns, please feel free to contact this office.

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

cc: Russell Thomas/City of Magnolia/Wastewater Manager
Bernie Finch/Finch Environmental