

Allen

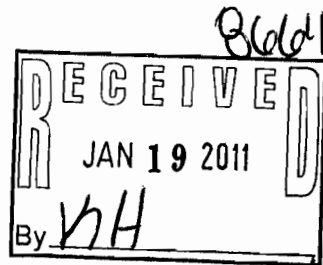
**Finch Environmental, PLC**

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

1/16/2011

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



*deemed complete & compliant.  
no further actions necessary  
AF*

JAN 19 2011

KN 8:15

Re: Southern Aluminum, 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;
2. Revised Schematic drawing of the process at Southern Aluminum; and
3. The results of a sample of the regulated waste streams analyzed for Total Toxic Organics and Metals

The analytical results of the sample taken on 12/15/2010 indicated an excursion above the monthly average and daily maximum pretreatment standards for new sources (PSNS) for 2,4-Dimethylphenol found at 40 CFR 433.17 of 10 µg/l. The reported value for 2,4-Dimethylphenol is 24.22 µg/l. In accordance with 40 CFR 403.12 please consider this letter as notification of Southern Aluminum becoming aware of the issue and please understand that we have initiated a repeat sampling event for 2,4-Dimethylphenol to be completed within 30 days of becoming aware of the excursion. This compound is not used in any way at the Southern Aluminum plant and is typically found in relation to the use of plasticizers which are not used at Southern Aluminum. We feel that this may be a laboratory or sampling error. A repeat sampling effort should help us discover why this compound was found in the 12/15/2010 sample.

Additionally, pH was analyzed in the laboratory to be 3.01 s.u. which is less than the allowed value for pH of 5.0 s.u. The plant has recently ordered and received a pH meter which can be used to take instantaneous readings at the plant for pH to avoid exceeding the holding time for a sample to be analyzed for pH. Southern Aluminum will resample for pH within 30 days of becoming aware of this issue and initiate efforts to comply with the standard for pH.

As required by regulations the City of Magnolia will be notified of these issues.

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

#### Attachments

Cc Colleen Tuggle, Southern Aluminum (w/o attachments)  
Thomas Russell, 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

**TELEPHONE NUMBER:** 870.234.8660

**e-mail:** ctuggle@southernaluminum.com

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

**A. MONTHS WHICH REPORTS ARE DUE**

June & December

**B. PERIOD COVERED BY THIS REPORT**

**FROM:** November, 2010

**TO:** December 31, 2010

## (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

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**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.

This Semi-Annual Report is the second Semi-Annual Report submitted for this facility. From this date forward Semi-Annual Reports will be filed with ADEQ for the six month periods beginning January through June (Report due in June) and July through December (Report due in December) of each year. Changes in regulated processes will be described in future reports.

\*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)	15	15	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**	~500	~500	Do Not Commingle
<b>Total Flow to POTW</b>	<b>515</b>	<b>515</b>	*****

\*"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	0.0038	0.012	0.029	0.00173	0.053	ND (0.0005)	0.957	ND (0.0100)	0.035
Ave Measured	0.0038	0.012	0.029	0.00173	0.053	ND (0.0005)	0.957	ND (0.0100)	0.035

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 12-15-2010;

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**

*§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: Ongoing development of a Toxic Organic Management Plan (TOMP). Please see cover letter.

**(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.

**Calculations:**

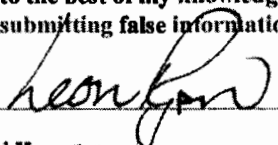
Four (4) batch discharges X 1,350 gallons per discharge X 1 Year ÷ 365 days per year = 15 gallons per day (approximate)

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

**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)



Date of Signature 1-17-11

**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.

\_\_\_\_\_  
(Typed Name)

\_\_\_\_\_  
(Corporate Officer or authorized representative)

Date of Signature \_\_\_\_\_

Intentionally left blank

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

Vice President/General Manager

OFFICIAL TITLE

1-17-11

DATE SIGNED

**Attachment 2**

**Analysis for Toxic Organics and Metals (40 CFR 433.11)**



# 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: 1012010406      Sample Date : 12/15/10      Collected By: LR  
 Customer Name : SOUTHERN ALUMINUM CO., INC.      Sample Time : 1500      Delivery By : UPS  
 Customer Number : 2754      Sample Type : GRAB WATER      Work Order :  
 Report Date : 01/13/11      Sample From :

Analysis				Laboratory Analysis		Quality Assurance			
Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
12/18	1130	NTR	Cyanide Total (as CN)	< 0.0100 mg/L			SM 18th 4500-CN E	5.41	93.7 *
12/21	0630	NTR	Oil & Grease, Total	< 1.400 mg/L			EPA 1664 A	2.59	96.5 *
12/16	1135	NTR	pH, Lab	3.01 S.U.			EPA 150.1	0.33	N/A
01/03	1546	BGW	Chromium	12.43 ug/L			EPA 200.8	0.24	93.9 *
12/22	0800	NTR	Solids, Total Suspended	24.00 mg/L			SM 18th 2540 D	8.70	N/A *
01/03	1546	BGW	Nickel	53.47 ug/L			EPA 200.8	1.96	96.7 *
01/03	1546	BGW	Copper	28.91 ug/L			EPA 200.8	1.32	96.0 *
01/03	1546	BGW	Zinc	957.86 ug/L			EPA 200.8	3.49	86.4 *
01/03	1546	BGW	Silver	< 0.50 ug/L			EPA 200.8	2.36	85.7 *
01/03	1546	BGW	Cadmium	3.83 ug/L			EPA 200.8	2.57	89.9 *
01/12	1521	BGW	Lead	1.73 ug/L			EPA 200.8	2.27	106.4 *

\* 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. Ray  
 Environmental Services Co., Inc.



# Environmental Services Company, Inc.

Corporate Office:  
13715 West Markham, Little Rock, Arkansas 72211  
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Web Site: [www.esclabs.com](http://www.esclabs.com)

## LABORATORY REPORT

Page 1 of 8

Client: Southern Aluminum Co., Inc. Sample Date: 12/15/10  
Control Number: 1012010406 / 1012020309 Receipt Date: 12/16/10  
Sample Type: Grab – Water Report Date: 01/07/11  
Sample Location:

### VOLATILE ORGANIC TARGET COMPOUNDS (µg/L or ppb)

<u>ANALYTE</u>	<u>RESULT</u>	<u>DETECTION LIMIT</u>
Acrolein	ND	10.53
Acrylonitrile	ND	4.82
Benzene	ND	0.45
Bromoform	ND	2.53
Carbon Tetrachloride	ND	0.57
Chlorobenzene	ND	0.58
Chlorodibromomethane	ND	0.71
Chloroethane	ND	1.24
2-Chloroethyl vinyl ether	ND	8.30
Chloroform	ND	0.72
Dichlorobromomethane	ND	0.55
1,1-Dichloroethane	ND	2.35
1,2-Dichloroethane	ND	2.16
1,1-Dichloroethene	ND	1.73
1,2-Dichloropropane	ND	2.65
1,3-Dichloropropene	ND	0.34
Ethylbenzene	ND	0.18
Methyl Bromide (Bromomethane)	ND	1.04



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## LABORATORY REPORT

Client: Southern Aluminum Co., Inc.

Page 2 of 8

Control Number: 1012010406 / 1012020309

### VOLATILE ORGANIC TARGET COMPOUNDS ( $\mu\text{g/L}$ or ppb)

<u>ANALYTE</u>	<u>RESULT</u>	<u>DETECTION LIMIT</u>
Methyl Chloride (Chloromethane)	ND	0.65
Methylene chloride	ND	2.51
1,1,2,2-Tetrachloroethane	ND	2.31
Tetrachloroethene	ND	0.50
Toluene	ND	0.33
1,2-trans-Dichloroethylene	ND	2.14
1,1,1-Trichloroethane	ND	0.37
1,1,2-Trichloroethane	ND	2.37
Trichloroethylene	ND	0.78
Vinyl Chloride	ND	0.81

### QUALITY ASSURANCE DATA

Method: EPA 624

<u>System Monitoring Compounds</u>	<u>% Recovery</u>	<u>% Recovery Limits</u>
Dibromofluoromethane	98.21	69-156
Toluene- $d_6$	106.09	76-111
4-Bromofluorobenzene	92.60	63-131

Analysis Date: 12/27/10

Analysis Time: 09:47

Analyst: RHB

A laboratory blank was monitored for all analytes of interest.



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## LABORATORY REPORT

Client: Southern Aluminum Co., Inc. Sample Date: 12/15/10  
Control Number: 1012010406 / 1012020309 Receipt Date: 12/16/10  
Sample Type: Grab – Water Report Date: 01/07/11  
Sample Location:

### BASE/NEUTRAL EXTRACTABLE FRACTION ( $\mu\text{g/L}$ or ppb)

<u>ANALYTE</u>	<u>RESULT</u>	<u>DETECTION LIMIT</u>
Acenaphthene	ND	1.04
Acenaphthylene	ND	1.01
Anthracene	ND	1.26
Benzidine	ND	3.26
Benzo (a) anthracene	ND	2.22
Benzo (a) pyrene	ND	4.33
Benzo (b) fluoranthene	ND	3.05
Benzo (ghi) perylene	ND	2.71
Benzo (k) fluoranthene	ND	4.06
Bis-(2-chloroethoxy) methane	ND	1.32
Bis (2-chloroethyl) ether	ND	3.96
Bis (2-chloroisopropyl) ether	ND	2.98
Bis (2-ethylhexyl) phthalate	ND	3.19
4-Bromophenyl phenyl ether	ND	4.06
Butyl benzyl phthalate	ND	3.04
2-Chloronaphthalene	ND	1.69
4-Chlorophenyl phenyl ether	ND	2.48
Chrysene	ND	2.04
Dibenzo (a,h) anthracene	ND	4.63
1,2-Dichlorobenzene	ND	1.24
1,3-Dichlorobenzene	ND	0.97
1,4-Dichlorobenzene	ND	0.84



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## LABORATORY REPORT

Client: Southern Aluminum Co., Inc.

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Control Number: 1012010406 / 1012020309

### BASE/NEUTRAL EXTRACTABLE FRACTION ( $\mu\text{g/L}$ or ppb)

<u>ANALYTE</u>	<u>RESULT</u>	<u>DETECTION LIMIT</u>
3,3'-Dichlorobenzidine	ND	1.54
Diethyl phthalate	ND	2.43
Dimethyl phthalate	ND	1.36
Di-n-butyl phthalate	ND	2.27
2,4-Dinitrotoluene	ND	3.60
2,6-Dinitrotoluene	ND	1.99
Di-n-octyl phthalate	ND	3.40
1,2-Diphenylhydrazine	ND	7.30
Fluorene	ND	2.40
Hexachlorobenzene	ND	3.24
Hexachlorobutadiene	ND	2.56
Hexachlorocyclopentadiene	ND	2.75
Hexachloroethane	ND	1.81
Indeno (1,2,3-cd) pyrene	ND	3.85
Isophorone	ND	1.10
Naphthalene	ND	0.81
Nitrobenzene	ND	1.45
N-nitrosodimethylamine	ND	3.41
N-nitrosodi-n-propylamine	ND	2.92
N-nitrosodiphenylamine	ND	3.66
Phenanthrene	ND	0.71
Pyrene	ND	4.50
1,2,4-Trichlorobenzene	ND	1.76



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## LABORATORY REPORT

Client: Southern Aluminum Co., Inc.  
Control Number: 1012010406 / 1012020309

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### QUALITY ASSURANCE DATA

Method: EPA 625

<u>System Monitoring Compounds</u>	<u>% Recovery</u>	<u>% Recovery Limits</u>
Nitrobenzene-d <sub>5</sub>	97.89	35-114
2-Fluorobiphenyl	101.85	43-116
p-Terphenyl-d <sub>14</sub>	91.26	33-141

Analysis Date: 01/07/11  
Analysis Time: 13:05  
Analyst: RHB

A laboratory blank was monitored for all analytes of interest.



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## LABORATORY REPORT

Client: Southern Aluminum Co., Inc.

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Control Number: 1012010406 / 1012020309

### ACID EXTRACTABLE FRACTION ( $\mu\text{g/L}$ or ppb)

<u>ANALYTE</u>	<u>RESULT</u>	<u>DETECTION LIMIT</u>
2-Chlorophenol	ND	5.28
2,4-Dichlorophenol	ND	3.36
2,4-Dimethylphenol	24.22	0.92
4,6-Dinitro-2-methylphenol	ND	1.66
2,4-Dinitrophenol	ND	2.65
2-Nitrophenol	ND	1.50
4-Nitrophenol	ND	7.07
4-Chloro-3-methylphenol	ND	6.76
Pentachlorophenol	ND	2.70
Phenol	ND	5.82
2,4,6-Trichlorophenol	ND	2.96

### QUALITY ASSURANCE DATA

Method: EPA 625

<u>System Monitoring Compounds</u>	<u>% Recovery</u>	<u>% Recovery Limits</u>
Phenol-d <sub>5</sub>	84.77	10-94
2-Fluorophenol	84.52	21-100
2,4,6-Tribromophenol	73.56	10-123

Analysis Date: 01/07/11

Analysis Time: 13:05

Analyst: RHB



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## LABORATORY REPORT

Client: Southern Aluminum Co., Inc.

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Control Number: 1012010406 / 1012020309

### CHLORINATED PESTICIDES ( $\mu\text{g/L}$ or ppb)

<u>ANALYTE</u>	<u>RESULT</u>	<u>DETECTION LIMIT</u>
Aldrin	ND	0.01
alpha-BHC	ND	0.03
beta-BHC	ND	0.01
gamma-BHC (Lindane)	ND	0.01
delta-BHC	ND	0.01
Chlordane	ND	0.10
4,4'-DDT	ND	0.02
4,4'-DDE	ND	0.01
4,4'-DDD	ND	0.01
Dieldrin	ND	0.01
alpha-Endosulfan	ND	0.01
beta-Endosulfan	ND	0.01
Endosulfan Sulfate	ND	0.10
Endrin	ND	0.02
Endrin Aldehyde	ND	0.02
Heptachlor	ND	0.01
Heptachlor Epoxide	ND	0.01
Toxaphene	ND	0.25

A laboratory blank was monitored for all analytes of interest.





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## LABORATORY REPORT

Client: Southern Aluminum Co., Inc.  
Control Number: 1012010406 / 1012020309

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### PCB ( $\mu\text{g/L}$ or ppb)

<u>ANALYTE</u>	<u>RESULT</u>	<u>DETECTION LIMIT</u>
PCB-1242	ND	0.050
PCB-1254	ND	0.050
PCB-1221	ND	0.050
PCB-1232	ND	0.050
PCB-1248	ND	0.050
PCB-1260	ND	0.050
PCB-1016	ND	0.050

### QUALITY ASSURANCE DATA

Method: EPA 608

<u>System Monitoring Compounds</u>	<u>% Recoveries</u>
2,4,5,6-tetrachloro- <i>m</i> -xylene	95.39
Decachlorobiphenyl	107.38

Analysis Date: 01/05/11  
Analysis Time: 14:31  
Analyst: RHB

A laboratory blank was monitored for all analytes of interest.

Data release authorized by :

Richard Brown