

Henderson, Katie

From: Gilliam, Allen
Sent: Friday, August 10, 2012 12:03 PM
To: Leon Ryan (lryan@southernaluminum.com); Colleen Tuggle (ctuggle@southernaluminum.com)
Cc: Bernie K. Finch; Henderson, Katie; Uyeda, Craig; magnolia russell thomas; Wilson, Penny
Subject: AR0043613_Southern Aluminum ARP001059 July 2012 semi annual Pretreatment report and SNC reply_20120802

Leon,

Your July 2012 semi-annual Pretreatment report was received and reviewed. Based on the analytical results that came with that report Southern Aluminum (SA) is in violation of:

- 1) The Metal Finishing (40 CFR 433.17) Zinc "Monthly Avg. Shall Not Exceed" limit of 1.48 mg/l;
- 2) 40 CFR 403.12(b), "Specific prohibitions. In addition, the following pollutants shall not be introduced into a POTW:...(2) Pollutants which will cause corrosive structural damage to the POTW, but in no case Discharges with pH lower than 5.0...". The pH measurement was documented on the Chain of Custody. This office assumes the pH was measured during the discharge period on 1/23/12; and
- 3) 40 CFR 403.12(g)(2), "If sampling performed by [SA] indicates a violation, [SA] shall notify [ADEQ] within 24 hours of becoming aware of the violation..." [reiterated from ADEQ's 1/12/12 semi-annual report reply]. This office cannot locate any correspondence/notification from SA denoting the Zinc and pH violations from the samples taken on 1/23/12 and analyzed on 1/26 and 1/27/12 by your contract lab.

SA is in significant non-compliance (SNC) for violating the Federal Metal Finishing zinc limitations in 40 CFR 433.17 per the criteria in 40 CFR 403.8(f)(2)(viii)(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 4/3/12 CAV's sampling results will not be included because of the questionable "representative" sampling conducted by this office (as stated in the CAV report [dated 5/4/12], Item B.).

Reported SA batch discharges indicated:

- 1) The rinse tank (~830 gallons) is batch discharged two (2) times/week;
- 2) The wash tank (~2050 gallons) is batch discharged four (4) times/year; and
- 3) The dip tank (~1000 gallons) is batch discharged once/year.

This office conducted a compliance assurance visit (CAV) at SA on April 3, 2012. I was confused why this semi-annual report's sampling and analysis was conducted in January of 2012. Was there a reason why the wash tank's batch tank was not sampled more than once during this semi-annual period (January 1, 2012 thru June 30, 2012; semi-annual report due in December and July of each year). It was my understanding from the CAV the wash tank was discharged every 3 to 4 months. Was the wash tank not batch discharged at any time during that six (6) month period except on 1/23/12?

Required sampling protocol similar to the 4/3/12 CAV's requirements:

- 1) Semi-Annual reports will no longer apply. "Discharge" reports which include sampling results (with lab report and Chain of Custody) will be submitted after the wash tank's batch discharge and after the dip tank's batch discharge.

Suggestions:

- 1) Wash tank batch discharges should coincide with the rinse tank discharges once/4 months (or as dictated by the wash tank's quality). Samples should be taken and reported to ADEQ immediately;
- 2) When the dip tank (~1000 gallons) is scheduled for batch discharge, SA should attempt to coincide its discharge with the rinse and wash tanks' batch discharge using the approximated flow weighted scheme.

One option suggested by other State Pretreatment Coordinators canvassed by this office was for SA to install a holding tank and store its wash and dip tanks' wastewater in it, have it analyzed for compliance with the Metal Finishing limitations before discharge to the City. A qualified professional knowledgeable about the hazardous waste regulations should be contacted to "characterize" the contents of the holding tank (if this option is chosen) to determine if it meets the definition of hazardous waste; therefore, storage time constraints and reporting/permitting requirements from ADEQ's Hazardous Waste Division.

Subsequent correspondence from SA via Finch Environmental dated 8/1/12 indicated the rinse tank batch discharges (four [4] samples total) were well below the Metal Finishing limitations in 40 CFR 433.17; therefore, each rinse tank batch discharge does not have to be sampled/analyzed/reported.

But from that same correspondence four (4) flow weighted "test" samples were taken from the rinse, wash and dip tanks on 7/6/12 (tanks were not fully batch discharged to the City). The results indicated that wastewater remained in violation of the Metal Finishing zinc monthly average limitations.

Apologies are extended from this office, but attempting to ascertain "representative sampling" is difficult due to your batch discharges from different regulated wastewater sources at different times throughout the year. Regardless of the tank batch discharged to the City, its wastewater characteristics must meet the minimum Federal Metal Finishing limitations in 40 CFR 433.17.

It may be prudent for Southern Aluminum's to seek assistance from a qualified professional to procure equipment to remove the zinc from the wash and dip tanks' wastewater. Further violations could increase the possibility ADEQ enforcement would have to be involved with formal enforcement action.

If there are further questions, concerns or comments please feel free to contact this office.

Sincerely,

Allen Gilliam
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