

ANNRR AG

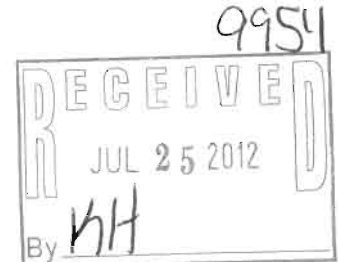
Finch Environmental, PLC

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

7/18/2012

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



Re: Southern Aluminum, Pretreatment Tracking Number ARP001059

Dear Mr. Gilliam,

SNC (see 8/10/12
AE e-mail from
this office)

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. The results of a sample of the regulated waste streams analyzed for Metals and Cyanide;
3. A photograph of the modified collection sump. This fitting is placed on the outlet which contains discharges from the rinse tank and wash tank prior to discharge to the municipal collection system and precludes contamination of these sources with sanitary waste from the plant.

The analytical results of the sample taken on 01/23/2012 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 (2.433 mg/l reported, NSPS for Zinc 1.48 mg/l (monthly average)). The plant intends to evaluate results of additional samples taken (described later in this letter) as suggested in your letter of May 4, 2012.

Additionally, pH was analyzed and found to be 3.1 s.u. Southern Aluminum continues to analyze pH each time a batch discharge occurs from any regulated source 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 directed by your office the plant initiated sampling efforts on the rinse tank (4 grab samples) and on the wash tank/rinse tank (samples taken 07-06-2012). We are awaiting results from the laboratory on these samples and will notify your office as soon as the results become available.

The plant will sample any time a discharge occurs from either of the regulated sources and submit results directly to you.

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,

A handwritten signature in black ink that reads "B K Finch". The letters are stylized and connected.

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 From ??? to ??? (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

July & January

B. PERIOD COVERED BY THIS REPORT

FROM: January 1, 2012

TO: June 30, 2012

(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

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

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 initial Semi-Annual Report for this facility. Changes in regulated processes will be described in future reports.

C. Number of Regular Employees at this Facility 135

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 N/A	15 3882	Batch
Regulated (Cyanide)	0	0 AB	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
Total Flow to POTW	515	515	*****

**8"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	0.009	0.0059	0.019	0.010	0.191	0.001	2.43	0.01	N/A
Ave Measured	0.009	0.0059	0.019	0.010	0.191	0.001	2.43	0.01	--

Sample Location Flow-weighted composite sample taken of wash, rinse, dip tank contributions prior to discharge to municipal collection system.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency Collected One (1) collected 01-23-2012;

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)

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)

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

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
 (Typed Name)
Vice President, General Manager *Leon Ryan*
 (Corporate Officer or authorized representative)

Date of Signature 7-24-12

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'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: None

(8) GENERAL COMMENTS

Flow (Discharge)

Southern Aluminum discharges to the City of Magnolia POTW in the following manner:

Rinse Tank (Capacity: 832 gallons): Discharges at a frequency of (2) times per week.

Wash Tank (Capacity: 2050 gallons): Batch discharges at a frequency of four (4) times per year.

Dip Tank (Capacity: 1000 gallons): Batch discharges at a frequency of one (1) time per year.

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

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

7-24-12

DATE SIGNED

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: 1201010413 Sample Date : 01/23/12 Collected By: CLIENT
 Customer Name : SOUTHERN ALUMINUM CO., INC. Sample Time : 1500 Delivery By : UPS
 Customer Number : 2754 Sample Type : GRAB WATER Work Order :
 Report Date : 01/27/12 Sample From : PRETREAT WATER Purchase Order :

Laboratory Analysis

Analysis		Result		Notes		Quantity		Method		Quality Assurance	
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery			
01/27	0630	NTR	< 0.0100	mg/L		SM 18th 4500-CN E	1.55	91.1	*		
01/23	1500	LR	3.1	S.U.		SM 18 4500 H+B					
01/26	1200	AJR	5.91	ug/L		EPA 200.8	1.39	96.6			
01/26	1200	AJR	191.19	ug/L		EPA 200.8	2.26	98.8			
01/26	1200	AJR	19.99	ug/L		EPA 200.8	0.92	98.7			
01/26	1200	AJR	2433.41	ug/L		EPA 200.8	1.70	96.2			
01/26	1200	AJR	< 1.00	ug/L		EPA 200.8	3.35	90.1			
01/26	1200	AJR	8.71	ug/L		EPA 200.8	1.75	87.9			
01/26	1200	AJR	< 10.00	ug/L		EPA 200.8	2.36	102.2			

* 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 Rye*
 Environmental Services Co., Inc.



Environmental Services Company, Inc.
 Corporate Office
 13715 West Markham P.O. Box 55146
 Little Rock, AR 72211 Little Rock, AR 72215
 website: www.eslabs.com

Environmental Services Company, Inc.
 Northwest Branch
 1107 Century
 Springdale, AR 72764

Phone: 501-221-2565 Fax: 501-221-1341

Phone 479-750-1170 Fax: 479-750-1172

CHAIN OF CUSTODY

Client Information					Project Information						Requested Parameters						
Company Name: Southern Aluminum Co., Inc.					Permit/Project #:						Metals (See Comments)						
Address: #5 Hwy 82 West Magnolia, AR 71753					Purchase Order #:												
Telephone: 800-221-0408 870-234-4665					Work Order #:												
Contact: Ms. Colleen Tuggle					Sampler Name(s):												
ESC Client Number: 2754					and Signature(s):												
Sample Identification					Sample Collection						Sample Containers						
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#	Cyanide(9)	PH(23-L)	X	X				
Pre-treat Water (pH 3.1)	1201010413	1-23-12	3:00pm	Grab	Water	Plastic	1 Liter	NaOH+Ascorbic	1								
				Grab	Water	Plastic	1 Liter	none	1								
				Grab	Water	Glass	1 Liter	HNO3*	1								
Relinquished By: (Signature and Printed Name) <i>Wendy Strauss</i>	1-23-11	Date	Time	Received By: (Signature and Printed Name) <i>UPS</i>													
Relinquished By: (Signature and Printed Name) <i>Wendy Strauss</i>	1-23-12	Date	Time	Received By: (Signature and Printed Name) <i>WRS Wendy Strauss Cindy Strauss</i>													
Relinquished By: (Signature and Printed Name) <i>Wendy Strauss Cindy Strauss</i>	1-24-12	Date	Time	Received For Lab By: (Signature and Printed Name) <i>Richard Hill Richard Hill</i>													
All samples cooled to ≤ 6 deg C with ice.					Flow Data					Field Test	Time	Analyst	Result	Result	Units		
Comments: Cd(48.PS), Cr(24.PS), Cu(29.PS), Pb(82.PS), Ni(28.PS), Ag(47.PS), Zn(30.PS)										pH:	Time:	Reading:	Units:				
* Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.													Chlorinated? Y N	Fecal Start:	This Document is Page ___ of ___		

Southern Aluminum Company

ARP001059

Photograph of Sump Device Used to Avoid Stagnant Water or Sanitary Contribution from Plant

Date Photograph Taken: 07.17.2012

