

## Gage, Hannah

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**From:** Gilliam, Allen  
**Sent:** Tuesday, November 01, 2016 9:17 AM  
**To:** colleen tuggle; 'ashultz@southernaluminum.com'  
**Cc:** 'Bernie K. Finch'; Gage, Hannah; Yates, Adam; McWilliams, Carrie; Leamons, Bryan; magnolia russell thomas  
**Subject:** AR0043613\_Southern Aluminum ARP001059 Notification of change of chems and discharge practices\_20161101  
**Attachments:** doc02571820161101083029.pdf

Mr. Finch,

This office is in receipt of correspondence (attached) indicating Southern Aluminum is changing its conversion coating chemicals from Fe Phosphate to Zirconium Phosphate. It is also understood the discharge practices will also be altered to reduce down time changing out the Fe Phosphate bath ~ every 2 weeks. This, as your correspondence indicates will no longer be necessary as the Zirc. Phosphate bath will be hauled off-site at a frequency on an as-yet determined frequency.

Semi-annual reports on the rinse waters from SA's conversion coating line will remain due during the months of June and December of each year. Bills of lading must accompany these reports if any of the contents of the "wash" or "dip" tank are hauled off-site.

Thank you for the notification on behalf of Southern Aluminum.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Russell Thomas, City of Magnolia - Wastewater Manager

E/NPDES/NPDES/Pretreatment/Reports

B107VF

**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*

10/6/2016

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

Re: Southern Aluminum Company, Inc., Pretreatment Tracking Number ARP001059

Dear Mr. Gilliam,

Please accept this letter and consider it a response to your e-mail messages of October 4th and 5th, 2016.

It is the intent of this letter to make ADEQ and the City of Magnolia aware of a substantial change in the volume or character of pollutants in the discharge from the plant per 40 CFR 403.12(j), "Notification of changed Discharge".

Please be aware that Southern Aluminum Company is changing conversion coating chemicals using "zirconium phosphate" chemistry. This change will cause the contents of the "wash tank" and the "dip tank" to not be discharged to the City of Magnolia collection system. This change in chemical process will result in the contents of the "wash tank" (capacity: 2,050 gallons) and the "dip tank" (capacity:1,000 gallons) being hauled off-site for proper disposal at a frequency that is yet to be determined. Southern Aluminum will submit a copy of the bill of lading (which will show volume and final disposal site) to ADEQ and the City of Magnolia each time contents of the "wash tank" or the "dip tank" are hauled off-site for proper disposal.

Southern Aluminum will now include in Section (3)B. "Description of Operations, Changes" of the Semi-Annual Report form a statement describing this change in operations/changes and that bills of lading have been submitted to the appropriate authorities.

The "rinse tank" (capacity: 832 gallons) will continue to discharge to the City of Magnolia periodically with the City of Magnolia being notified a minimum of 48 hours prior to the discharge from the "rinse tank". This single waste stream (the only one discharging to the City of Magnolia collection system) will be analyzed for 40 CFR 433.17 PSNS metals and cyanide once every six months (January - June and July - December) of each year.

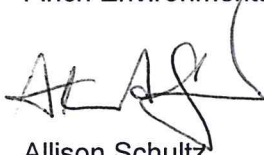
A sample of this discharge will be taken of the "rinse tank" waste stream with the sample analyzed by an ADEQ certified laboratory (Environmental Services Company of Little Rock) at a minimum frequency of once every six months with analytical results reported on the Semi-Annual Report form in June and December of each year.

Thank you.

Sincerely,



Bernie K. Finch  
Finch Environmental, PLC



Allison Schultz  
Chief Operating Officer  
Southern Aluminum Company, Inc.

Cc Colleen Tuggle, Southern Aluminum Company, Inc.  
Jeff Farrar, Southern Aluminum Company, Inc.  
Russell Thomas, City of Magnolia