## Wilson, Tabatha

From: Sent:	Gilliam, Allen Wednesday, December 04, 2013 3:59 PM
То:	Colleen Tuggle (ctuggle@southernaluminum.com); Leon Ryan (Iryan@southernaluminum.com)
Cc:	Fuller, Kim; Wilson, Tabatha; Bernie K. Finch; magnolia russell thomas
Subject:	AR0043613_Southern Aluminum ARP001059 Nov 2013 Zinc periodic report and ADEQ reply_20131204
Attachments:	Southern Aluminums Nov 2013 Zn Analysis.pdf
Follow Up Flag: Flag Status:	Follow up Flagged

## Colleen,

Your latest Zinc periodic compliance report was sent via Finch Environmental and received on 12/4/13. The analysis of the sample taken on 11/11/13 indicated an elevated Zinc level, but below the monthly average Metal Finishing standard in 40 CFR 433.17.

As per the agreement between the City (Russell Thomas), Southern Aluminum (SA) and this office back in October of this year, SA may return to semi-annual reporting for all 40 CFR 433 (Metal Finishing) parameters after submittal of the remaining zinc analysis for the end of November through December remaining on the once/2 week batch discharge schedule.

This agreement holds only if SA's Zinc levels remain in compliance with the Metal Finishing "Monthly average shall not exceed" Zinc limit of 1.48 mg/l.

As mentioned before, Mr. Thomas requires a 48 hour notice prior to any batch discharge.

If there is a conflict of this "once/2 week" batch discharge through the holidays, please advise.

Thank you for your time and cooperation in this "returning to compliance" endeavor.

Sincerely,

Allen Gilliam ADEQ State Pretreatment Coordinator 501.682.0625

ec: Russell Thomas, City of Magnolia Wastewater Manager Bernie Finch, Finch Environmental, PLC

E/NPDES/NPDES/Pretreatment/Reports

# CDXT9pf

## 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

DEC

4 2013

12/2/2013

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

ZN compliance monitoring 11913 TW

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

Dear Mr. Gilliam,

On behalf of Southern Aluminum Company, please accept this attached "Periodic Report" form as requested. Also included with this submittal is the laboratory analytical results and chain of custody form.

Please accept this submittal and contact me with questions.

Thank you.

Sincerely,

BAKFA

Bernie K. Finch Finch Environmental, PLC

Attachment

Cc Russell Thomas, City of Magnolia

SEMI-ANNUAL REPORT FOR IN se of this form is not an EPA/ADEQ requirement.	NDUSTRIAL USERS REGULATED BY 40CFR433 Attn: Water Div/NPDES Pretrea
(1) IDENTIFYING INFORMATION	
A. LEGAL NAME & MAILING ADDRESS	B. FACILITY & LOCATION ADDRESS
Southern Aluminum	Southern Aluminum
P.O. Box 884	5 Highway 82 West
Magnolia, AR 71754	Magnolia, AR 71753
C. FACILITY CONTACT: Colleen Truggle . TELEP tuggle@southernsluminum.com (2) REPORTING PERIOD	211ONE NUMBER: 870.234.8660 e-mail:
A. MONTHS WHICH REPORTS ARE DUE	B. PERIOD COVERED BY THIS REPORT
*This is a Periodic Batch Report	FROM: November 11, 2013 TO: November 11, 2013
(3) DESCRIPTION OF OPERATION	
A. REGULATED PROCESSES	B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF
CORE PROCESS(ES)	THE SPACE BELOW IS INADEQUATE, PROVIDE A NEW SCHEMATIC IF APPROPRIATE.

CORE PROCESS(ES)	SCHEMATIC IF APPROPRIATE.
CHECK EACH APPLICABLE BLOCK	
G Electroplating	
G Electroless Plating	
G Anodízing	
O Coatiug	
G Chemical Etching and Milling	
G Printed Circuit Board Manufacture	
ANCILLARY PROCESS(ES)*	
LIST BELOW EACH PROCESS USED IN THE FACILITY	
Coating	
Cleaning	
	<b>x</b>
• •	
SEF 40('FR433.10(a) FOR 40 DIFFERENT OPERATIONS	
C. Number of Regular Employees at this Facility 135	D. [Reserved]

Process	Average	Maximum	Type of Discharge
Regulated (Core & Ancillary)	Sce Note Below	See Note Below	2882
Regulated (Cyanide)	0	0	N/A
<u>' 403.6(e) Unregulated</u> *	Ð	0	<u>N/A</u>
' 403.6(e) Dilute	0	0	N/A
Cooling Water**	0	0	N/A
Sanitary**	0	0	N/A
Total Flow to POTW	Sec Note Below	See Note Below	2882

"\*"Unregulated" has a precise legal meaning; see 40CFR403.6(c).

\*\*Indicate if these Streams commingle with Regulated Streams BEFORE treatment

#### (5) MEASUREMENT OF POLLUTANTS

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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	Za	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	N/A	N/A	N/A	N/A	N/A	N/A	1.292	N/A	TOMP (N/A)
Ave Measured	N/A	N/A	N/A	N/A	N/A	N/A	1.292	N/A	TOMP (N/A)

Sample Location <u>Sample taken at confluence of all regulated processes (Dip Tank, Wash Tauk aud Rinse Tank)</u> <u>immediately preceding discharge to municipal collection system. Dip tank was not discharged on 11-11-</u> 2013.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency Collected\_one (1) collected 11-11-2013;

40 CFR 136 Preservation and Analytical Methods Use: x 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 nuder 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 Vice President/General Manager (Typed Name)

authorized representative) (Corporate Officer of

#### B. CHECK ONE: '433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED ✓O '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 Vice President/General Manager

(Typed Name) (Corporate Officer or authorized representative)

Date of Signature 11 . 22.13

Intentionally left blank

(7) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 1310] et sea.]

<sup>3</sup> 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 or 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; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled in an environmentally safe manner.

The User may list any new or ongoing Pollution Prevention practices: Initial submittal of a Toxic Organic Management Plan (TOMP).

#### (8) GENERAL COMMENTS

Flow Calculations:

Southern Aluminum batch discharged on November 11, 2013.

2050 gallons from Wash Tank (core process)

832 gallons from Rinse Tank (ancillary process)

= 2882 gallons to the Magnolia municipal sewer system.

pH: 7.3 s.u.

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(9) SIGNATORY REQUIREMENTS [40CFR403.12(1)]

I certify nnder 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 snpervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the informatiou 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. Rvan NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Vice President/General Manager

Leon Kron SIGNATURE

OFFICIAL TITLE

11-27-13 DATE SIGNED

Corporate Office 13715 West Markham Little Rock, AR 72211 Tel. (501)221-2565 Fax (501)221-1341	Tel.	Northwest Arkansas 1107 Century Av Springdale, AR (479)750-1170 Fax	venue 2 72762			
Control Number: 1311010415 Customer Name : SOUTHERN ALUMINUM CO., INC. Customer Number : 2754 Report Date : 11/25/13	Sample Date : 11/11/13 Sample Time : 1300 Sample Type : GRAB WATER Sample From :	Collected By: C TUGGLE/J FAR Delivery By : UPS Work Order : Purchase Order :				
Analysis Date Time By Parameter Re	<u>y Analysis</u> <u>sult Notes Quantity</u> 2.00 ug/L	Method EPA 200.7	<u>Quality Assurance</u> Precision Accuracy <u>% RPD % Recovery</u> 1.48 113.8 *			

Environmental Services Company Inc

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 <u>M.S.</u> <u>Yye</u> <u>Environmental Services Co., Inc.</u>

E	onmental Services Company, Inc.							
Corporate Office								
13715 W	est Markham	P.O. Box 55146						

Little Rock, AR 72211 Little Rock, AR 72215 website: www.esclabs.com

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CHAIN OF CUSTODY

**Environmental Services Cor** iy, Inc. Northwest Branch 1107 Century Springdale, AR 72764

Phone: 501-221-2565						510	JY	Р	hone	479	-750-1	170	Fax	: 479-7	50-11	72
	<b>Client Information</b>				Pr	oject Inf	ormation				R	eque	sted	Param	eters	\$
Company Name:	Southern Aluminum Co., Inc.			Permit/Pro	Permit/Project #:											
Address:	#5 Hwy 82 West Magnolia, AR 71753 800-221-0408			Purchase Order #:								*****				
				Work Order #												
Telephone:				Sampler Name(s): JEST FIRRE			WA									
Fax:	870-234-4665				71		Calleen Tugge			P						
Contact:	Ms. Colleen Tuggl	9		and Signa	ture(s):	Jal Franker					NZ.					
ESC Client Number:	2754					71	nc	gy (			Total(74.ZN)					
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Identification	ESC Control #	Date	Time	Туре	Matrix	Туре	Volume	Preserva	ative	#	Zìnc,					
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* Per 40 CFR 136.3 Ta	able II Note 19, samp	les preserve	ed in labor	atory.			Fecal Start	1			This D	)ocum	nent is	Page	of	