

## Wilson, Tabatha

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**From:** Gilliam, Allen  
**Sent:** Monday, December 02, 2013 2:05 PM  
**To:** Colleen Tuggle (ctuggle@southernaluminum.com); Leon Ryan (lryan@southernaluminum.com)  
**Cc:** magnolia russell thomas; Fuller, Kim; Wilson, Tabatha; Bernie K. Finch  
**Subject:** AR0043613\_Southern Aluminum ARP001059 Oct 2013 Zinc periodic report and ADEQ reply\_20131202  
**Attachments:** Southern Aluminum Oct 2013 Periodic Report.pdf

Colleen,

Southern Aluminum's (SA) periodic compliance report for Zinc was received on 11/15/13, reviewed and deemed compliant with the zinc Metal Finishing standards in 40 CFR 433.17. It is becoming apparent the more frequent SA batch discharges its "work tanks" along with the also-regulated rinse water, the better the chance SA will remain in compliance with the Metal Finishing standards.

As opined in the most recent e-message to you, it is possible a most ideal (more cost effective) discharge frequency could be tied to the actual hours the "work" tanks are being used to conversion coat your aluminum work-pieces (with the zinc coated fasteners).

Thank you very much for your understanding in realizing these Metal Finishing standards are Federal standards and apply equally to all Metal Finishers across the U.S. and taking the time to eliminate your initial zinc exceedances.

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

AWIID 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*

11/13/2013

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

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.

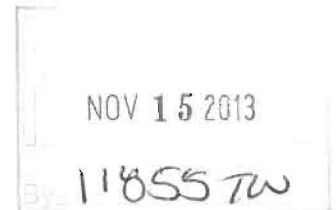
Please accept this submittal and contact me with questions.

Thank you.

Sincerely,

B K F S

Bernie K. Finch  
Finch Environmental, PLC



Attachment

Cc Russell Thomas, City of Magnolia

**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 2010 (Both Semi-Annual Reports must cover Fiscal Year)**

**A. MONTHS WHICH REPORTS ARE DUE**

\*This is a Periodic Batch Report

**B. PERIOD COVERED BY THIS REPORT**

**FROM: October 28, 2013    TO: October 28, 2013**

**(3) DESCRIPTION OF OPERATION**

**A. REGULATED PROCESSES**

**CORE PROCESS(ES)**

CHECK EACH APPLICABLE BLOCK

- G** Electroplating
- G** Electroless Plating
- G** Anodizing
- O** Coating
- G** Chemical Etching and Milling
- G** Printed Circuit Board Manufacture

**ANCILLARY PROCESS(ES)\***

LIST BELOW EACH PROCESS USED IN THE FACILITY

**Coating** \_\_\_\_\_

**Cleaning** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**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.

\*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)	See Note Below	See Note Below	2882
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**	0	0	N/A
Total Flow to POTW	See Note Below	See Note Below	2882

\*\*"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	N/A	N/A	N/A	N/A	N/A	N/A	0.076	N/A	TOMP (N/A)
Ave Measured	N/A	N/A	N/A	N/A	N/A	N/A	0.076	N/A	TOMP (N/A)

Sample Location Sample taken at confluence of all regulated processes (Dip Tank, Wash Tank and Rinse Tank) immediately preceding discharge to municipal collection system. Dip tank was not discharged on 10-28-2013.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency Collected one (1) collected 10-28-2013;

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 Vice President/General Manager

(Typed Name)

Leon Ryan  
(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 Vice President/General Manager

(Typed Name)

Leon Ryan  
(Corporate Officer or authorized representative)

Date of Signature 11 - 12 - 13

Intentionally left blank

*\*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: Initial submittal of a Toxic Organic Management Plan (TOMP).

**(8) GENERAL COMMENTS**

**Flow Calculations:**

**Southern Aluminum batch discharged on October 28, 2013.**

**2050 gallons from Wash Tank (core process)**

**+**

**832 gallons from Rinse Tank (ancillary process)**

**= 2882 gallons to the Magnolia municipal sewer system.**

**pH: 6.8 s.u.**

**(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

11 - 12 - 13  
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: 1310010667  
 Customer Name : SOUTHERN ALUMINUM CO., INC.  
 Customer Number : 2754  
 Report Date : 11/07/13

Sample Date : 10/28/13  
 Sample Time : 1320  
 Sample Type : GRAB WATER  
 Sample From : FINAL EFFLUENT

Collected By: JF, CT  
 Delivery By : UPS  
 Work Order :  
 Purchase Order :

### Laboratory Analysis

Analysis						Quality Assurance			
Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision	Accuracy
								% RPD	% Recovery
10/28	1320	JF	pH	6.8 S.U.			2000 4500 H+B		
11/01	1503	RAH	Zinc, Total	76.00 ug/L			EPA 200.7	3.26	103.6 *

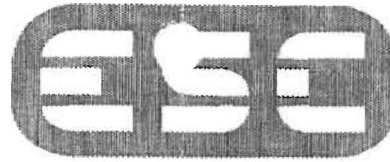
\* QA data shown is from a different sample or standard on the same date.

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   
 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.esclabs.com](http://www.esclabs.com)



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

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

### CHAIN OF CUSTODY

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

Client Information						Project Information				Requested Parameters				
Company Name: Southern Aluminum Co., Inc.						Permit/Project #:				Zinc, Total(74.ZN)				
Address: #5 Hwy 82 West Magnolia, AR 71753						Purchase Order #:								
Telephone: 800-221-0408						Work Order #:								
Fax: 870-234-4665						Sampler Name(s): <u>JEFF FARRAR</u>								
Contact: Ms. Colleen Tuggle						and Signature(s): <u>Colleen Tuggle</u>								
ESC Client Number: 2754														
Sample Identification		Sample Collection				Sample Containers								
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#					
Final Effluent	1310010667	10-28-13	1:20pm	Grab	Water	Plastic	8 oz	HNO3 to pH <2*	1	X				
Relinquished By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Custody Seals:						
<u>Jeff Farrar</u>		10-28-13	1:30pm	<u>Lindy Strauss</u>		10-29-13	10:20	Used? <input checked="" type="checkbox"/> Intact? <input type="checkbox"/>						
Relinquished By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Turnaround:						
<u>Colleen Tuggle</u>		10-28-13	1:30pm	<u>Lindy Strauss</u>		10-29-13	10:20	Regular <input checked="" type="checkbox"/> Special <input type="checkbox"/>						
Relinquished By: (Signature and Printed Name)		Date	Time	Received for Lab By: (Signature and Printed Name)		Date	Time	Were samples properly preserved:						
<u>Lindy Strauss</u>		10-30-13	0945	<u>Richard Hall</u>		10-30-13	0945	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>						
Comments:						Flow Data	Field Test	Time	Analyst	Result	Result	Units		
						Analyst:	pH: <u>6.8</u>	<u>1:20pm</u>						
						Time:								
						Reading:								
						Units:								
* Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.						Fecal Start:				This Document is Page <u>1</u> of <u>1</u>				

Directions