

Gage, Hannah

From: Gilliam, Allen
Sent: Wednesday, October 05, 2016 12:43 PM
To: 'Bernie K. Finch'
Cc: Colleen Tuggle; Jeff Farrar; 'mwws@sbcglobal.net'; Gage, Hannah; Yates, Adam; McWilliams, Carrie; Leamons, Bryan
Subject: AR0043613_Southern Aluminum ARP001059 Oct 2016 change of change of conversion coating chems response_20161005

Bernie,

If Southern Aluminum (SA) is changing their conversion coating chemicals using this "Zirconium Phosphate" chemistry a notification per 40 CFR 403.12(j), "*Notification of changed Discharge*. All Industrial Users shall promptly notify the [ADEQ] (and Magnolia...) in advance of any substantial change in the volume or character of pollutants in their Discharge..." needs to be made with the note: "that specific 'work tank' will be hauled off-site for proper disposal on a "one to two year frequency".

This may seem superfluous, but I'd advise erring on the cautious side with something in writing.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

From: Bernie K. Finch [mailto:bkfinch@sbcglobal.net]
Sent: Tuesday, October 04, 2016 2:09 PM
To: Gilliam, Allen
Cc: Colleen Tuggle; Jeff Farrar; 'mwws@sbcglobal.net'; Gage, Hannah; Yates, Adam; McWilliams, Carrie; Leamons, Bryan
Subject: Re: AR0043613_Southern Aluminum ARP001059 Sept 2016 change of wastewater disposal agreement response_20161004

Allen,

Today, I confirmed with Southern Aluminum that they completely understand that the City has the legal right of entry to examine files and take representative samples at any reasonable work time at the plant. On the time/day that Mr. Thomas visited the plant there was a discharge planned for that day, however the pH in the wash tank had not been raised to compliant levels consistent with standard operating procedure for all bi-weekly discharges. Therefore, no discharge to the City had occurred as of the time of Mr. Thomas' initial visit. A discharge to the City collection system was to occur between 1:00 and 2:00 P.M. on that day (after the pH had been sufficiently raised).

It was communicated to Mr. Thomas by plant personnel that he was welcome to return to the plant in approximately one hour when the plant was to commence the planned, bi-weekly discharge to the City collection system. The sample Mr. Thomas collected during his initial visit that day was not representative of the planned discharge scheduled for later that day. Southern Aluminum believes they have a good working relationship with the City of Magnolia and wish to continue that relationship.

The contents of the "wash tank" being contained for an extended period (1-2 years) is a result of the introduction of a new preparation chemical to the process, Zirconium Phosphate, supplied by Houghton Prep ZP Technology. This chemical is used in several other similar operations successfully in the United States which allows considerably less frequent emptying of the "wash tank".

If any additional filtration units/types are added to the process a revised wastewater flow diagram and process narrative can be submitted to ADEQ after communication with the agency to determine if these submittals will be necessary.

Please let me know if you have questions or comments.

Thank you.

Sincerely,

Bernie K. Finch

Finch Environmental, PLC

9 Heritage Park Circle
North Little Rock, AR 72116
Telephone/Facsimile: 501-231-1510/501-771-6940
bkfinch@sbcglobal.net
www.finchenvironmental.com

cc Colleen Tuggle, Southern Aluminum
Jeff Farrar, Southern Aluminum
Russell Thomas, City of Magnolia
Hannah Gage, ADEQ
Adam Yates, ADEQ
Carrie McWilliams, ADEQ
Bryan Leamons, ADEQ
FEPLC e-file

From: "Gilliam, Allen" <GILLIAM@adeq.state.ar.us>
To: 'Bernie K. Finch' <bkfinch@sbcglobal.net>
Cc: Colleen Tuggle <ctuggle@southernaluminum.com>; Jeff Farrar <jfarrar@southernaluminum.com>; "mwws@sbcglobal.net" <mwws@sbcglobal.net>; "Gage, Hannah" <gageh@adeq.state.ar.us>; "Yates, Adam" <yates@adeq.state.ar.us>; "McWilliams, Carrie" <mcwilliamsc2@adeq.state.ar.us>; "Leamons, Bryan" <LEAMONS@adeq.state.ar.us>
Sent: Tuesday, October 4, 2016 11:46 AM
Subject: AR0043613_Southern Aluminum ARP001059 Sept 2016 change of wastewater disposal agreement response_20161004

Thank you Bernie,

Please let it be known the City representative has the legal authority of right of entry to examine files and take representative samples at any reasonable work time at Southern Aluminum. Mr. Thomas insinuated yesterday he was recently impeded for an unknown reason from taking samples immediately upon arrival.

Again, thank you for the response representing Southern Aluminum's (SA) acceptance to the stipulations below.

Please supply information how SA plans to keep the "wash tank" free of impurities for "1 to 2 years" to successfully complete its conversion coating process. Considering the volume of workpieces sent through this bath, this office has not observed similar chemical process tanks last as long as Southern Aluminum asserts ["one (1) to two (2) years"].

If additional filtration units/types are added to keep this phosphoric acid bath clean enough for extended use, a revised wastewater flow diagram and process narrative may be necessary.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

From: Bernie K. Finch [<mailto:bkfinch@sbcglobal.net>]

Sent: Tuesday, October 04, 2016 9:22 AM

To: Gilliam, Allen

Cc: Colleen Tuggle; Jeff Farrar; 'mwws@sbcglobal.net'; Gage, Hannah; Yates, Adam; McWilliams, Carrie; Leamons, Bryan

Subject: Re: AR0043613_Southern Aluminum ARP001059 Sept 2016 change of wastewater discharge request to haul regulated wastewater offsite response_20161004

Allen,

Southern Aluminum is in agreement and will comply with the stipulations in your electronic message (please see below). Southern Aluminum will make changes to Section (3)B. "Description of Operations, Changes" consistent with your recommendation.

We anticipate and are hopeful to empty/dispose of the contents of the wash tank at a frequency of one time every one (1) to two (2) years.

Please let me know if there is any other information that you require.

Thank you.

Sincerely,

Bernie K. Finch

Finch Environmental, PLC

9 Heritage Park Circle
North Little Rock, AR 72116
Telephone/Facsimile: 501-231-1510/501-771-6940

bkfinch@sbcglobal.net

<http://www.finchenvironmental.com/>

cc Colleen Tuggle, Southern Aluminum
Jeff Farrar, Southern Aluminum
Russell Thomas, City of Magnolia
Hannah Gage, ADEQ
Adam Yates, ADEQ
Carrie McWilliams, ADEQ
Bryan Leamons, ADEQ
FEPLC e-file

From: "Gilliam, Allen" <GILLIAM@adeq.state.ar.us>

To: 'Bernie K. Finch' <bkfinch@sbcglobal.net>

Cc: Colleen Tuggle <ctuggle@southernaluminum.com>; Jeff Farrar <jfarrar@southernaluminum.com>; "mwws@sbcglobal.net" <mwws@sbcglobal.net>; "Gage, Hannah" <gageh@adeq.state.ar.us>; "Yates, Adam" <yates@adeq.state.ar.us>; "McWilliams, Carrie" <mcwilliamsc2@adeq.state.ar.us>; "Leamons, Bryan" <LEAMONS@adeq.state.ar.us>

Sent: Tuesday, October 4, 2016 9:00 AM

Subject: AR0043613_Southern Aluminum ARP001059 Sept 2016 change of wastewater discharge request to haul regulated wastewater offsite response_20161004

Bernie, et. al.,

Apologies for the late response.

Via phone conversations yesterday with Magnolia's Wastewater Manager, Russell Thomas, it was agreed your proposal cited below was acceptable with the following stipulations:

- 1) Submit a copy of the bill of lading (which should show volume and final disposal site) to this office and Russell Thomas each time contents of the wash or dip tank is hauled off-site to Rineco; and
- 2) Southern Aluminum will now include in Section (3)B. "Description of Operations, Changes" a statement something to the effect, "Contents of the 2,050 gallon Wash Tank and the 1,000 gallon Dip Tank are being hauled off-site and disposed of properly by Rineco of Benton, Arkansas on an as needed basis. All bills of lading have been submitted to the appropriate authorities".

What frequency do you anticipate for the wash tank's emptying/disposal?

Thank you for this advance notification of proposed wastewater discharge change.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Russell Thomas, City of Magnolia Wastewater Manager

E/NPDES/NPDES/Pretreatment/Reports

From: Bernie K. Finch [<mailto:bkfinch@sbcglobal.net>]
Sent: Friday, September 23, 2016 3:08 PM
To: Gilliam, Allen
Cc: Colleen Tuggle; Jeff Farrar; Bernie K. Finch
Subject: Southern Aluminum Company, Permit Number ARP001059

Allen,

As you may remember Southern Aluminum Company in Magnolia, Arkansas discharges core and ancillary process water from tanks to the City of Magnolia POTW.

There are three tanks onsite used in the production process:

1. Wash Tank (2050 gallon capacity)
2. Rinse (832 gallon capacity)
3. Dip (1000 gallon capacity)

As agreed between Southern Aluminum, ADEQ and the City of Magnolia, the wash tank and the rinse tank have been discharging to the City once every two weeks with the City being notified 48 hours prior to each event with the combined waste stream analyzed for 40 CFR 433.17 PSNS metals and cyanide once every six months (January - June and July - December) of each year. The dip tank seldom discharges to the City, however, it is understood that it is also a regulated waste stream.

As per the agreement a sample is taken of the combined waste streams with the sample analyzed by an ADEQ certified laboratory (Environmental Services Company of Little Rock) at a minimum frequency of once every six months. Draining the wash tank once every two weeks causes a significant disruption in production. Southern Aluminum is exploring ways to avoid this costly downtime caused by taking the wash tank out of operation.

Southern Aluminum would like to propose that only the rinse tank discharge to the City of Magnolia collection system with process water from the wash tank and the dip tank be transported to Rineco in Benton, Arkansas for treatment/destruction. Historically, process water in the rinse tank has shown only trace or non-detectable amounts of 40 CFR 433.17 metals and cyanide. The last rinse tank analysis yielded a concentration (of zinc) of 0.03 mg/l, well below the monthly average limit of 1.48 mg/l for zinc.

The waste stream of concern has been the wash tank. This (wash tank) waste stream would be transported and handled by Rineco of Benton, AR under this proposal as would the contents of the dip tank when it became necessary to empty the dip tank.

Rinse tank water must be kept pristine in the process to produce a high quality product demanded by the market. This (rinse tank) water would be discharged to the City collection system twice per week with a sample taken each six month period with a semi-annual report submitted to ADEQ on or before June 30 and December 31 of each year. The City would be notified prior to each discharge (same as before).

Please review this proposal and indicate whether or not ADEQ would be amenable to it at your earliest convenience. We would certainly be willing to place this proposal in writing to be signed by the cognizant official at Southern Aluminum Company prior to transmittal to ADEQ.

Thank you for your consideration.

Sincerely,

Bernie K. Finch

Finch Environmental, PLC

9 Heritage Park Circle

North Little Rock, AR 72116

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ec Colleen Tuggle, Southern Aluminum
Jeff Farrar, Southern Aluminum
FEPLC Electronic Files