

## Wilson, Tabatha

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**From:** Gilliam, Allen  
**Sent:** Monday, December 09, 2013 11:06 AM  
**To:** Bernie K. Finch; Colleen Tuggle  
**Cc:** Fuller, Kim; Wilson, Tabatha; magnolia russell thomas  
**Subject:** AR0043613\_Southern Aluminum ARP001059 Oct thru Dec 2013 Zinc report period and ADEQ reply\_20131204  
**Attachments:** AR0043613\_Southern Aluminum ARP001059 Sept 2013 Periodic Pretreatment Report and ADEQ Reply\_20131009.pdf

Ms. Tuggle and Mr. Finch,

The office appreciates Southern Aluminum's (SA) attempts to come into compliance with the Federal Pretreatment Regulations.

Please review the correspondence dated 10/9/13 and attached where it states, "Based on correspondence from SA stating it must batch discharge its work tank(s) along with its regulated rinse wastewater approximately once every two weeks to remain in compliance with the zinc Metal Finishing limit, Mr. Thomas {Magnolia's Wastewater Manager} concurred with your proposed 'sample for zinc once/month for the next three (3) months' " with an e-correspondence starting date of 10/9/13 regardless of when the zinc samples' were taken.

Even in Finch Environmental correspondence (within the attached), the initial request for "[Sampling] for zinc (total) only at a frequency of once every month for the next three (3) months." was dated 10/2/13.

SA has consistently shown compliance with its problematic zinc since that "starting date" (two days after SA's report was received by this office). Phone conversations with Russell Thomas last week concluded that the end of the "next three (3) months" period would be through the month of December.

Apologies from this office for not making the "start date" more clear, but two (2) more zinc sample/analysis through December will only help substantiate SA's claim its "twice/month" batch discharge procedure will eliminate the zinc "monthly average not to exceed" limit in the Metal Finishing standards in 40 CFR 433.

Thank you for your cooperation,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Russell Thomas, Magnolia Wastewater Manager

E/NPDES/NPDES/Pretreatment/Reports

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**From:** Bernie K. Finch [<mailto:bkfinch@sbcglobal.net>]  
**Sent:** Friday, December 06, 2013 9:06 AM

**To:** Gilliam, Allen

**Cc:** Colleen Tuggle

**Subject:** Re: AR0043613\_Southern Aluminum ARP001059 Nov 2013 Zinc periodic report and ADEQ reply\_20131204

Allen,

Southern Aluminum has performed analyses on bi-weekly samples for 3 months (September, October and November). There is one analysis still remaining to be analyzed that is at the lab for the last batch discharge to the City of Magnolia SS System. I understood that three months was sufficient for sampling and reporting. If you require a fourth month (December) we can certainly do that.

Please advise at your earliest convenience.

Thank you.

Sincerely,

*Bernie K. Finch*

**Finch Environmental, PLC**

9 Heritage Park Circle

North Little Rock, AR 72116

Telephone/Facsimile: 501.771.6940

[bkfinch@sbcglobal.net](mailto:bkfinch@sbcglobal.net)

[www.finchenvironmental.com](http://www.finchenvironmental.com)

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## Wilson, Tabatha

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**From:** Gilliam, Allen  
**Sent:** Wednesday, October 09, 2013 3:51 PM  
**To:** Colleen Tuggle  
**Cc:** Bernie Finch; jfarrar@southernaluminum.com; Russell Thomas; Fuller, Kim; Wilson, Tabatha  
**Subject:** AR0043613\_Southern Aluminum ARP001059 Sept 2013 periodic Pretreatment report and ADEQ reply\_20131009  
**Attachments:** Southern Aluminum's Sept 2013 Periodic Report.pdf

Colleen,

Southern Aluminum's (SA) periodic Pretreatment report (attached) was received on 10/7/13 via Finch Environmental, reviewed, deemed complete and compliant with the Federal Pretreatment reporting requirements in 40 CFR 403.12(e) and more specifically compliant with the Federal Metal Finishing standards in 40 CFR 433.

Regarding your future sampling/reporting frequency, this office has conferred by phone with Russell Thomas, Magnolia's Wastewater Superintendent. Based on correspondence from SA stating it must batch discharge its work tank(s) along with its regulated rinse wastewater approximately once every two weeks to remain in compliance with the zinc Metal Finishing limit, Mr. Thomas concurred with your proposed "sample for zinc once/month for the next three (3) months" following the aforementioned "mixed" batch discharge practice. Mr. Thomas requires that SA notify his office 48 hours prior to the batch discharges starting in November through January so he can also sample over the period of discharge.

[This office requests a written standard operating procedure which is prominently displayed near the "work" tank station(s) or given to the cleaning line's operators guaranteeing they have been made knowledgeable the phosphoric acid ("work") tanks will be discharged at a frequency of not more than two (2) week's operating time (if this is determined to be the true appropriate time lapse) and at the same time as the rinse tank's wastewater. A log book should also be part of this management practice noting when the work tanks are batch discharged along with the rinse tank's wastewater with the operator's printed and signed name at the time and date of each batch discharge. This log book would be kept on-site available for review (or a copy submitted per request) by appropriate City and/or State officials.]

After this (compliant) three (3) month trial period Mr. Thomas would then take into consideration SA's future sampling/reporting of once per six (6) months [minimum sampling/reporting requirement per 40 CFR 403.12(e)] . Again, Mr. Thomas would have to be notified 48 hours in advance of discharge.

If there are any questions or comments please feel free to contact this office or "reply to all" to this e-message.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Russell Thomas, Magnolia's Wastewater Superintendent  
Bernie Finch, Finch Environmental – Consultant to Southern Aluminum

E/NPDES/NPDES/Pretreatment/Reports

AW 16H  
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*

10/2/2013

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,

Please accept this letter and consider it requests as we discussed on the telephone on 10-1-2013. Also, please find attached a "Periodic Report" with supporting laboratory analytical results and a chain of custody form related to a sample taken on 9-13-2013.

Based on recent compliance with metals and cyanide (40 CFR 433.17) and concentrations of zinc (total) shown to be well below the monthly average concentration limit of 1.48 mg/l Southern Aluminum Company would like to make the following requests:

1. Sample for zinc (total) only at a frequency of once every month for the next three (3) months.
2. If compliance with the 40 CFR 433.17 limitation for zinc (total) is achieved during the next three months please consider reducing the sampling frequency to once every six (6) months for Zinc (total) and all other 433.17 metals and Cyanide. These results would be reported in support of the Semi-Annual Report.

A discharge frequency of once every two weeks from regulated processes has been established to increase the likelihood of compliance with 40 CFR 433.17, particularly the limit for zinc (total).

Please accept this submittal and contact me with questions.

Thank you.

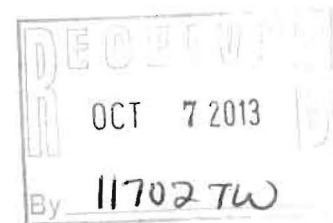
Sincerely,



Bernie K. Finch  
Finch Environmental, PLC



Leon M. Ryan  
Vice President/General Manager  
Southern Aluminum Company, Inc.



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 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:** September 13, 2013    **TO:** September 13, 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  
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 <sup>+</sup>
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	0.001	0.0001	0.0015	0.0005	0.002	0.0005	0.465	0.010	TOMP (N/A)
Ave Measured	0.001	0.0001	0.0015	0.0005	0.002	0.0005	0.465	0.010	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 09-13-2013.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency Collected One (1) collected 09-13-2013;

40 CFR 136 Preservation and Analytical Methods Use:  Yes  No

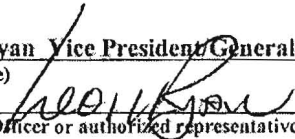
Indicate Combined Wastestream Factor if Dilution Streams Exist w/Regulated Streams N/A

(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.

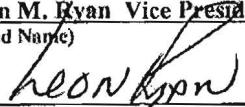
Leon M. Ryan Vice President/General Manager  
(Typed Name)

  
(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)

  
(Corporate Officer or authorized representative)

Date of Signature 10-1-13

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 September 13, 2013.

2050 gallons from Wash Tank (core process)

+

832 gallons from Rinse Tank (ancillary process)

= 2882 gallons to the Magnolia municipal sewer system.

pH: 7.6 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

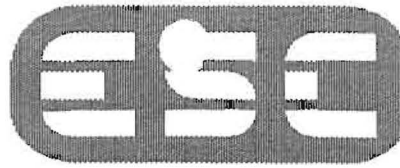
Vice President/General Manager  
OFFICIAL TITLE

Leon Ryan  
SIGNATURE

10 - 1 - 13  
DATE SIGNED



Environmental Services Company, Inc.  
 Corporate Office  
 13715 West Markham P.O. Box 55143  
 Little Rock, AR 72211 Little Rock, AR 72215  
 website: 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 #:						Cyanide(9) Metals (See Comments)					
Address: #5 Hwy 82 West Magnolia, AR 71753				Purchase Order #:											
Telephone: 800-221-0408				Work Order #:											
Fax: 870-234-4665				Sampler Name(s): <i>Off Farm</i>											
Contact: Ms. Colleen Tuggle				and Signature(s): <i>Colleen Tuggle</i>											
ESC Client Number: 2754															
Sample Identification		Sample Collection				Sample Containers									
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#						
	1309010299	9-13-13	1:45pm	Grab	Water	Plastic	1 Liter	NaOH+Ascorbic	1	X					
		9-13-13	1:45pm	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:							
<i>Off Farm</i>		9-13-13	2:00pm	<i>Richard Hall</i>		9-16-13	1005	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:							
<i>Colleen Tuggle</i>		9-13-13	2:00pm	<i>Richard Hall Tina Hall</i>		9-16-13	1000	Regular <input 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:							
<i>Richard Hall Tina Hall</i>		9-16-13	1005	<i>Richard Hall</i>		9-16-13	1025	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>						
Comments: Cd(48.PS), Cr(24.PS), Cu(29.PS), Pb(82.PS), Ni(28.PS), Ag(47.PS), Zn(30.PS)		Flow Data		Field Test		Time	Analyst	Result	Result	Units					
		Analyst:		pH: 7.6		1:45pm									
		Time:		Reading:											
		Units:		Fecal Start:											
* Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.											This Document is Page ___ of ___				

*Handwritten mark*