



ARKANSAS  
Department of Environmental Quality

CERTIFIED MAIL, RETURN RECEIPT REQUESTED 7006 3450 0003 4065 6733

September 16, 2010

Leon Ryan  
Vice President and General Manager  
Southern Aluminum  
P.O. Box 884  
Magnolia, AR 71754

Re: Southern Aluminum's (ARP001059) Pretreatment Reports and Compliance Status under the Federal Pretreatment Program

Dear Mr. Ryan,

Your semi-annual or "First Baseline Report" was received 5/28/10, reviewed, deemed incomplete and must be resubmitted. Southern Aluminum's (SA) compliance status meets the EPA criteria for significant non-compliance in 40 CFR 403.8(f)(2)(viii)(A),(F) and (G).

Findings of violations summary:

- 1) Southern Aluminum's (SA) baseline monitoring report (BMR) was e-requested on 2/18/09, 4/1/09, 7/13/09 with the last one requested on 8/19/09. A BMR form required under 40 CFR 403.12(b) was attached to each e-mail from ADEQ;
- 2) By certified mail, ADEQ's Water Enforcement Branch Manager, Ms. Cindy Garner sent you a request (dated 11/13/09) for a completed BMR due by 11/30/09. To date, a complete BMR has not been submitted;
- 3) SA submitted test results on 1/25/10 for the toxic organics and the metals in 40 CFR 433. The analysis indicated violations of the pretreatment standards in 40 CFR 433.17, namely cadmium and zinc. No repeat analysis can be located as required in 40 CFR 403.12(g)(2);
- 4) This final submittal was received on 5/28/10 with the hand-written note stating "First Baseline Report" includes a rough schematic, but has no analytical test results to verify compliance with 40 CFR 433.17 limitations. This report is, whether it is supposed to be a BMR or a required semi-annual report is incomplete, inadequate and must be resubmitted to this office by 10/18/2010.

It must contain a more detailed schematic, a process narrative, more details on the raw materials used in your processes and analytical results to verify compliance or non-compliance with the metal finishing standards in 40 CFR 433.17.

Phone messages from this office in the past to your facility have yielded no reply.

Sincerely,

A handwritten signature in cursive script, appearing to read "Allen Gilliam".

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

cc: Katie Henderson/E-drive/"Pretreatment Reports"  
Cindy Garner/NPDES Enforcement Manager  
Mo Shafii/Assistant Water Division Chief  
Russell Thomas/City of Magnolia/Wastewater Utilities Manager/P.O. Box 666  
Magnolia, AR 71753