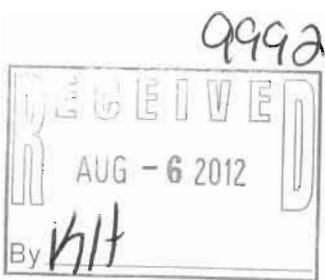


ANXPT SB AG

**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



8/1/2012

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

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

*response to 4/3/12 CAV  
Adequate  
AG*

Dear Mr. Gilliam,

Please accept this letter and consider it a response to your letter dated may 4, 2012 for the referenced facility located in Magnolia, Arkansas.

As indicated in your letter, requirements and suggestions pertain to:

1. Federal Metal Finishing Standards 40 CFR Part 433.17; and
2. Sampling point configuration

Federal Metal Finishing Standards (40 CFR 433.17)

**Rinse Tank**

On July 6, 2012 Southern Aluminum obtained four (4) grab samples from the rinse tank as it discharged to the City of Magnolia sanitary sewer system. The results are indicated below. Laboratory reports and chain of custody forms are attached to this letter as Attachment 1.

| Rinse Tank Sample Number | Results (mg/l) for Metals; (s.u.) for pH |          |        |        |       |        |         |        |     |
|--------------------------|--|----------|--------|--------|-------|--------|---------|--------|-----|
|                          | Cyanide                                  | Chromium | Nickel | Copper | Zinc  | Silver | Cadmium | Lead   | pH  |
| 1                        | 0.01                                     | 0.017    | 0.012  | 0.024  | 0.025 | 0.0005 | 0.0770  | 0.0007 | 6.9 |
| 2                        | 0.01                                     | 0.002    | 0.002  | 0.019  | 0.001 | 0.0005 | 0.0001  | 0.0005 | 6.9 |
| 3                        | 0.01                                     | 0.002    | 0.002  | 0.023  | 0.003 | 0.0005 | 0.0001  | 0.0005 | 6.9 |
| 4                        | 0.01                                     | 0.002    | 0.003  | 0.022  | 0.001 | 0.0005 | 0.0001  | 0.0005 | 6.9 |

The monthly average concentration limit found at 40 CFR 433.17 for zinc (total) is 1.48 mg/l with the result for zinc considerably less than this limit in all four (4) samples. In accordance with your letter, Southern Aluminum will not be required to sample when a discharge comprised solely of water from the rinse tank occurs. It is our belief that the result for Cadmium (0.077 mg/l) in sample number 1 is an anomaly. All other samples analyzed from the rinse tank and from the rinse + dip + wash tanks (composite sample) as well as all other available analytical results indicate very small concentrations of Cadmium (0.0001 mg/l). The plant will, of course,

continue to analyze Cadmium as required by 40 CFR 433.17 and evaluate the concentration of Cadmium to insure that our assumption regarding this metal is correct.

### Sampling Point Configuration

Southern Aluminum will continue to utilize a fitting that elevates the end of pipe from regulated waste streams to prevent contamination or dilution from standing water in the lower part of the sampling sump. A photograph of this sampling configuration is included as Attachment 2.

When a discharge of regulated wastes occurs and a sample is to be taken the sump lid will be removed, the PVC device installed and the sample taken. When there are no discharges of regulated wastes, the PVC device will be removed and the sampling sump lid will be re-installed in place.

### Additional Sampling

Additionally, on July 6, 2012, a sampling effort was made consisting of four flow weighted composite samples from the wash tank, the rinse tank and the dip tank. The results are shown below.

| <i>Wash Tank +<br/>Rinse Tank +<br/>Dip Tank (flow-<br/>weighted<br/>composite<br/>sample<br/>number)</i> | <i>Results (mg/l) for Metals; (s.u.) for pH</i> |                 |               |               |             |               |                |             |           |
|---|---|-----------------|---------------|---------------|-------------|---------------|----------------|-------------|-----------|
|   | <i>Cyanide</i>                                  | <i>Chromium</i> | <i>Nickel</i> | <i>Copper</i> | <i>Zinc</i> | <i>Silver</i> | <i>Cadmium</i> | <i>Lead</i> | <i>pH</i> |
| 1   | 0.01  | 0.016           | 0.038         | 0.051         | 2.073       | 0.019         | 0.0001         | 0.002       | 2.8       |
| 2   | 0.01  | 0.016           | 0.037         | 0.046         | 2.080       | 0.0005        | 0.0001         | 0.001       | 2.8       |
| 3   | 0.01  | 0.018           | 0.035         | 0.048         | 2.071       | 0.0005        | 0.0001         | 0.001       | 2.8       |
| 4   | 0.01  | 0.016           | 0.034         | 0.048         | 2.070       | 0.0005        | 0.0001         | 0.002       | 2.8       |

As indicated by the results shown above the monthly average limit (40 CFR 433.17) for zinc was exceeded (PSNS limits = 1.48 mg/l). However, compliance with the daily maximum limit was achieved (2.61 mg/l). These results will be include in the Semi-Annual Report for the period including 07-01-2012 through 12-31-2012.

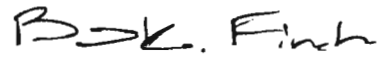
Compliance with all other applicable PSNS (40 CFR 433.17) limitations was achieved. We are aware that the City of Magnolia is required to limit pH for indirect discharges to a pH of less than 5.0 s.u., unless the treatment works are specifically designed to accommodate such discharges. Southern Aluminum will consider pH adjustment concurrently as other treatment options are explored (to reduce the concentration of zinc).

Southern Aluminum continues to explore adjusting discharge scenarios which will include discharging rinse water during any discharge from the other two regulated sources (dip tank or wash tank) and discharging water from the wash tank or dip tank before the concentration of zinc will cause a non-compliance event. Southern Aluminum also continues to explore treatment options. Your office will be kept updated on progress.

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

Cc Colleen Tuggle, Southern Aluminum

Attachment 1

Laboratory Analytical Results

# 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: 1207010202  
 Customer Name : SOUTHERN ALUMINUM CO., INC.  
 Customer Number : 2754  
 Report Date : 07/23/12

Sample Date : 07/06/12  
 Sample Time : 1530  
 Sample Type : GRAB WATER  
 Sample From : RINSE TANK #1

Collected By: CLIENT  
 Delivery By : UPS  
 Work Order :  
 Purchase Order :

### Laboratory Analysis

| Date  | Time | By  | Parameter             | Result   | Notes | Quantity | Method            | Precision<br>% RPD | Accuracy<br>% Recover |
|-------|------|-----|-----------------------|----------|-------|----------|-------------------|--------------------|-----------------------|
| 07/18 | 0730 | NTR | Cyanide Total (as CN) | < 0.0100 |       |          | SM 18th 4500-CN E | 0.00               | 99.5                  |
| 07/13 | 1120 | AJR | Chromium              | 17.16    |       |          | EPA 200.8         | 4.38               | 95.6                  |
| 07/13 | 1120 | AJR | Nickel                | 11.60    |       |          | EPA 200.8         | 5.61               | 99.0                  |
| 07/13 | 1120 | AJR | Copper                | 24.46    |       |          | EPA 200.8         | 6.06               | 98.0                  |
| 07/13 | 1120 | AJR | Zinc                  | 25.20    |       |          | EPA 200.8         | 7.10               | 95.0                  |
| 07/13 | 1120 | AJR | Silver                | < 0.50   |       |          | EPA 200.8         | 6.98               | 86.7                  |
| 07/13 | 1120 | AJR | Cadmium               | 76.60    |       |          | EPA 200.8         | 2.30               | 91.0                  |
| 07/13 | 1120 | AJR | Lead                  | 0.74     |       |          | EPA 200.8         | 6.80               | 100.3                 |

\* 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.

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 Little Rock, AR 72211  
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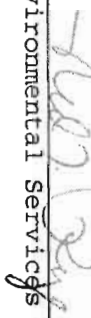
Northwest Arkansas Branch  
 1107 Century Avenue  
 Springdale, AR 72762  
 Tel. (479) 750-1170 Fax (479) 750-1172

Control Number: 1207010209      Sample Date: 07/06/12      Collected By: CLIENT  
 Customer Name: SOUTHERN ALUMINUM CO., INC.      Sample Time: 1530      Delivery By: UPS  
 Customer Number: 2754      Sample Type: GRAB WATER      Work Order:  
 Report Date: 07/23/12      Sample From: RINSE TANK #1      Purchase Order:

| Analysis |          | Laboratory Analysis   |               | Quality Assurance |          |                 |                    |
|----------|----------|-----------------------|---------------|-------------------|----------|-----------------|--------------------|
| Date     | Time By  | Parameter             | Result        | Notes             | Quantity | Precision % RPD | Accuracy % Recover |
| 07/18    | 0730 NTR | Cyanide Total (as CN) | < 0.0100 mg/L |                   |          | 0.00            | 99.5               |
| 07/13    | 1120 AJR | Chromium              | 1.55 ug/L     |                   |          | 4.38            | 95.6               |
| 07/13    | 1120 AJR | Nickel                | 1.80 ug/L     |                   |          | 5.61            | 99.0               |
| 07/13    | 1120 AJR | Copper                | 19.30 ug/L    |                   |          | 6.06            | 98.0               |
| 07/13    | 1120 AJR | Zinc                  | < 1.00 ug/L   |                   |          | 7.10            | 95.0               |
| 07/13    | 1120 AJR | Silver                | < 0.50 ug/L   |                   |          | 6.98            | 86.7               |
| 07/13    | 1120 AJR | Cadmium               | < 0.10 ug/L   |                   |          | 2.30            | 91.0               |
| 07/13    | 1120 AJR | Lead                  | < 0.50 ug/L   |                   |          | 6.80            | 100.3              |

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

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Northwest Arkansas Branch  
 1107 Century Avenue  
 Springdale, AR 72762  
 Tel. (479) 750-1170 Fax (479) 750-1172

Control Number: 1207010210  
 Customer Name : SOUTHERN ALUMINUM CO., INC.  
 Customer Number : 2754  
 Report Date : 07/23/12

Sample Date : 07/06/12  
 Sample Time : 1530  
 Sample Type : GRAB WATER  
 Sample From : RINSE TANK #3

Collected By: CLIENT  
 Delivery By : UPS  
 Work Order :  
 Purchase Order :

| Analysis |         | Laboratory Analysis   |          | Quality Assurance |          |                   |                 |                    |
|----------|---------|-----------------------|----------|-------------------|----------|-------------------|-----------------|--------------------|
| Date     | Time By | Parameter             | Result   | Notes             | Quantity | Method            | Precision % RPD | Accuracy % Recover |
| 07/18    | 0730    | NTR                   | < 0.0100 |                   |          | SM 18th 4500-CN E | 0.00            | 99.5               |
| 07/13    | 1120    | Cyanide Total (as CN) | 1.85     |                   |          | EPA 200.8         | 4.38            | 95.6               |
| 07/13    | 1120    | Chromium              | 2.19     |                   |          | EPA 200.8         | 5.61            | 99.0               |
| 07/13    | 1120    | Nickel                | 23.40    |                   |          | EPA 200.8         | 6.06            | 98.0               |
| 07/13    | 1120    | Copper                | 3.13     |                   |          | EPA 200.8         | 7.10            | 95.0               |
| 07/13    | 1120    | Zinc                  | < 0.50   |                   |          | EPA 200.8         | 6.98            | 86.7               |
| 07/13    | 1120    | Silver                | < 0.10   |                   |          | EPA 200.8         | 2.30            | 91.0               |
| 07/13    | 1120    | Cadmium               | < 0.50   |                   |          | EPA 200.8         | 6.80            | 100.3              |
| 07/13    | 1120    | Lead                  | < 0.50   |                   |          | EPA 200.8         |                 |                    |

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Signature *[Handwritten Signature]*  
 Environmental Services Co., Inc.

# Environmental Services Company, Inc.

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 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: 1207010211  
 Customer Name : SOUTHERN ALUMINUM CO., INC.  
 Customer Number : 2754  
 Report Date : 07/23/12

Sample Date : 07/06/12  
 Sample Time : 1530  
 Sample Type : GRAB WATER  
 Sample From : RINSE TANK #4

Collected By: CLIENT  
 Delivery By : TPS  
 Work Order :  
 Purchase Order :

| Analysis |          | Laboratory Analysis   |               | Quality Assurance |          |                 |                    |
|----------|----------|-----------------------|---------------|-------------------|----------|-----------------|--------------------|
| Date     | Time By  | Parameter             | Result        | Notes             | Quantity | Precision % RPD | Accuracy % Recover |
| 07/18    | 0730 NTR | Cyanide Total (as CN) | < 0.0100 mg/L |                   |          | 0.00            | 99.5               |
| 07/13    | 1120 AJR | Chromium              | 2.09 ug/L     |                   |          | 4.38            | 95.6               |
| 07/13    | 1120 AJR | Nickel                | 2.76 ug/L     |                   |          | 5.61            | 99.0               |
| 07/13    | 1120 AJR | Copper                | 22.18 ug/L    |                   |          | 6.06            | 98.0               |
| 07/13    | 1120 AJR | Zinc                  | < 1.00 ug/L   |                   |          | 7.10            | 95.0               |
| 07/13    | 1120 AJR | Silver                | < 0.50 ug/L   |                   |          | 6.98            | 86.7               |
| 07/13    | 1120 AJR | Cadmium               | < 0.10 ug/L   |                   |          | 2.30            | 91.0               |
| 07/13    | 1120 AJR | Lead                  | < 0.50 ug/L   |                   |          | 6.80            | 100.3              |

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

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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

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

## CHAIN OF CUSTODY

| Client Information  |                                      |                   |        | Project Information   |        |              |         | Requested Parameters |   |            |         |                       |  |       |
|---|--------------------------------------|-------------------|--------|---|--------|--------------|---------|----------------------|---|------------|---------|-----------------------|--|-------|
| Company Name:   | Southern Aluminum Co., Inc.          |                   |        | Permit/Project #:   |        |              |         |                      |   |            |         |                       |  |       |
| Address:  | #5 Hwy 82 West<br>Magnolia, AR 71753 |                   |        | Purchase Order #:   |        |              |         |                      |   |            |         |                       |  |       |
| Telephone:  | 800-221-0408                         |                   |        | Work Order #:   |        |              |         |                      |   |            |         |                       |  |       |
| Fax:  | 870-234-4665                         |                   |        | Sampler Name(s):  |        |              |         |                      |   |            |         |                       |  |       |
| Contact:  | Ms. Colleen Tuggle                   |                   |        | and Signature(s):   |        |              |         |                      |   |            |         |                       |  |       |
| ESC Client Number:  | 2754                                 |                   |        |   |        |              |         |                      |   |            |         |                       |  |       |
| Sample Identification   |                                      | Sample Collection |        | Sample Containers   |        |              |         |                      |   |            |         |                       |  |       |
| Identification  | ESC Control #                        | Date              | Time   | Type  | Matrix | Type         | Volume  | Preservative         | #   | Cyanide(9) | pH(23.) | Metals (See Comments) |  |       |
| 4-GRAB #1<br>Rinse Tank   | 1207010202                           | 7-6-12            | 3:30pm | Grab  | Water  | Plastic      | 1 Liter | NaOH+Ascorbic        | 1   | X          |         |                       |  |       |
| 12  | 1207010209                           |                   |        | Grab  | Water  | Plastic      | 1 Liter | none                 | 1   |            | X       |                       |  |       |
| 13  | 1207010210                           |                   |        | Grab  | Water  | Glass        | 1 Liter | HNO3*                | 1   |            |         |                       |  |       |
| 14  | 1207010211                           |                   |        |   |        |              |         |                      |   |            |         |                       |  |       |
| Relinquished By: (Signature and Printed Name)<br><i>[Signature]</i>                   |                                      | Date              | Time   | Received By: (Signature and Printed Name)<br><i>[Signature]</i> |        | Date         |         | Time                 | Custody Seals:<br>Used? <input type="checkbox"/> Intact? <input type="checkbox"/>                     |            |         |                       |  |       |
| Relinquished By: (Signature and Printed Name)<br><i>[Signature]</i>                   |                                      | Date              | Time   | Received By: (Signature and Printed Name)<br><i>[Signature]</i> |        | Date         |         | Time                 | Were samples properly preserved:<br>Regular <input type="checkbox"/> Special <input type="checkbox"/> |            |         |                       |  |       |
| All samples cooled to ≤ 6 deg C with ice.   |                                      |                   |        | Flow Data   |        | Field Test   |         | Time                 |   | Analyst    |         | Result                |  | Units |
| Comments: Cd(48.PS), Cr(24.PS), Cu(29.PS), Pb(82.PS), Ni(28.PS), Ag(47.PS), Zn(30.PS) |                                      |                   |        |   |        |              |         |                      |   |            |         |                       |  |       |
| * Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.                 |                                      |                   |        | Chlorinated? Y N  |        | Fecal Start: |         |                      |   |            |         |                       |  |       |

# 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: 1207010212      Sample Date : 07/06/12      Collected By: CLIENT  
 Customer Name : SOUTHERN ALUMINUM CO., INC.      Sample Time : 1515      Delivery By : UPS  
 Customer Number : 2754      Sample Type : GRAB WATER      Work Order :  
 Report Date : 07/23/12      Sample From : WASH/RINSE/DIP #1      Purchase Order :

| Analysis |          | Laboratory Analysis   |               | Quality Assurance |          |                   |                 |                     |
|----------|----------|-----------------------|---------------|-------------------|----------|-------------------|-----------------|---------------------|
| Date     | Time By  | Parameter             | Result        | Notes             | Quantity | Method            | Precision % RPD | Assurance % Recover |
| 07/18    | 0730 NTR | Cyanide Total (as CN) | < 0.0100 mg/L |                   |          | SM 18th 4500-CN E | 0.00            | 99.5                |
| 07/13    | 1120 AJR | Chromium              | 15.65 ug/L    |                   |          | EPA 200.8         | 4.38            | 95.6                |
| 07/13    | 1120 AJR | Nickel                | 38.03 ug/L    |                   |          | EPA 200.8         | 5.61            | 99.0                |
| 07/13    | 1120 AJR | Copper                | 50.68 ug/L    |                   |          | EPA 200.8         | 6.06            | 98.0                |
| 07/13    | 1120 AJR | Zinc                  | 2073.00 ug/L  |                   |          | EPA 200.8         | 7.10            | 95.0                |
| 07/13    | 1120 AJR | Silver                | 19.20 ug/L    |                   |          | EPA 200.8         | 6.98            | 86.7                |
| 07/13    | 1120 AJR | Cadmium               | < 0.10 ug/L   |                   |          | EPA 200.8         | 2.30            | 91.0                |
| 07/13    | 1120 AJR | Lead                  | 1.70 ug/L     |                   |          | EPA 200.8         | 6.80            | 100.3               |

\* 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.

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 1107 Century Avenue  
 Springdale, AR 72762  
 Tel. (479) 750-1170 Fax (479) 750-1172

Control Number: 1207010213  
 Customer Name : SOUTHERN ALUMINUM CO., INC.  
 Customer Number : 2754  
 Report Date : 07/23/12

Sample Date : 07/06/12  
 Sample Time : 1525  
 Sample Type : GRAB WATER  
 Sample From : WASH/RINSE/DIP #2

Collected By: CLIENT  
 Delivery By : UPS  
 Work Order :  
 Purchase Order :

### Laboratory Analysis

| Date  | Time | By  | Parameter             | Result   | Notes | Quantity | Method            | Precision % RPD | Accuracy % Recover |
|-------|------|-----|-----------------------|----------|-------|----------|-------------------|-----------------|--------------------|
| 07/18 | 0730 | NTR | Cyanide Total (as CN) | < 0.0100 |       |          | SM 18th 4500-CN E | 0.00            | 99.5               |
| 07/13 | 1120 | AJR | Chromium              | 16.17    |       |          | EPA 200.8         | 4.38            | 95.6               |
| 07/13 | 1120 | AJR | Nickel                | 36.82    |       |          | EPA 200.8         | 5.61            | 99.0               |
| 07/13 | 1120 | AJR | Copper                | 46.05    |       |          | EPA 200.8         | 6.06            | 98.0               |
| 07/13 | 1120 | AJR | Zinc                  | 2080.00  |       |          | EPA 200.8         | 7.10            | 95.0               |
| 07/13 | 1120 | AJR | Silver                | < 0.50   |       |          | EPA 200.8         | 6.98            | 86.7               |
| 07/13 | 1120 | AJR | Cadmium               | < 0.10   |       |          | EPA 200.8         | 2.30            | 91.0               |
| 07/13 | 1120 | AJR | Lead                  | 1.20     |       |          | EPA 200.8         | 6.80            | 100.3              |

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

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Signature

  
 Environmental Services Co., Inc.

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Northwest Arkansas Branch  
 1107 Century Avenue  
 Springdale, AR 72762  
 Tel. (479) 750-1170 Fax (479) 750-1172

Control Number: 1207010214  
 Customer Name: SOUTHERN ALUMINUM CO., INC.  
 Customer Number: 2754  
 Report Date: 07/23/12

Sample Date: 07/06/12  
 Sample Time: 1505  
 Sample Type: GRAB WATER  
 Sample From: WASH/RINSE/DIP #3

Collected By: CLIENT  
 Delivery By: UPS  
 Work Order:  
 Purchase Order:

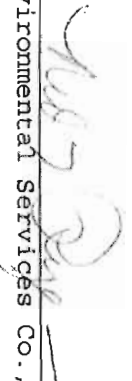
Analysis

| Date  | Time | By  | Parameter             | Result   | Notes | Quantity | Method            | Precision % RPD | Quality Assurance % Recover |
|-------|------|-----|-----------------------|----------|-------|----------|-------------------|-----------------|-----------------------------|
| 07/18 | 0730 | NTR | Cyanide Total (as CN) | < 0.0100 |       |          | SM 18th 4500-CN E | 0.00            | 99.5                        |
| 07/13 | 1120 | AJR | Chromium              | 17.77    |       |          | EPA 200.8         | 4.38            | 95.6                        |
| 07/13 | 1120 | AJR | Nickel                | 35.19    |       |          | EPA 200.8         | 5.61            | 99.0                        |
| 07/13 | 1120 | AJR | Copper                | 47.52    |       |          | EPA 200.8         | 6.06            | 98.0                        |
| 07/13 | 1120 | AJR | Zinc                  | 2071.00  |       |          | EPA 200.8         | 7.10            | 95.0                        |
| 07/13 | 1120 | AJR | Silver                | < 0.50   |       |          | EPA 200.8         | 6.98            | 86.7                        |
| 07/13 | 1120 | AJR | Cadmium               | < 0.10   |       |          | EPA 200.8         | 2.30            | 91.0                        |
| 07/13 | 1120 | AJR | Lead                  | 1.00     |       |          | EPA 200.8         | 6.80            | 100.3                       |

Laboratory Analysis

\* 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  
 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: 1207010215      Sample Date : 07/06/12      Collected By: CLIENT  
 Customer Name : SOUTHERN ALUMINUM CO., INC.      Sample Time : UNKNOWN      Delivery By : UPS  
 Customer Number : 2754      Sample Type : GRAB WATER      Work Order :  
 Report Date : 07/23/12      Sample From : WASH/RINSE/DIP #4      Purchase Order :

| Analysis |         | Laboratory Analysis   |          | Quality Assurance |          |                   |                 |                    |
|----------|---------|-----------------------|----------|-------------------|----------|-------------------|-----------------|--------------------|
| Date     | Time By | Parameter             | Result   | Notes             | Quantity | Method            | Precision % RPD | Accuracy % Recover |
| 07/18    | 0730    | NTR                   | < 0.0100 |                   |          | SM 18th 4500-CN E | 0.00            | 99.5               |
|          |         | Cyanide Total (as CN) | 15.62    |                   |          | EPA 200.8         | 4.38            | 95.6               |
| 07/13    | 1120    | AJR                   | 34.42    |                   |          | EPA 200.8         | 5.61            | 99.0               |
|          |         | Nickel                | 47.87    |                   |          | EPA 200.8         | 6.06            | 98.0               |
| 07/13    | 1120    | AJR                   | 2070.00  |                   |          | EPA 200.8         | 7.10            | 95.0               |
|          |         | Copper                | < 0.50   |                   |          | EPA 200.8         | 6.98            | 86.7               |
| 07/13    | 1120    | AJR                   | < 0.10   |                   |          | EPA 200.8         | 2.30            | 91.0               |
|          |         | Silver                | 1.50     |                   |          | EPA 200.8         | 6.80            | 100.3              |
| 07/13    | 1120    | AJR                   |          |                   |          |                   |                 |                    |
|          |         | Cadmium               |          |                   |          |                   |                 |                    |
|          |         | Lead                  |          |                   |          |                   |                 |                    |

\* 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

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

## CHAIN OF CUSTODY

| Client Information  |               |                   |              | Project Information   |        |                |              | Requested Parameters   |   |  |  |
|---|---------------|-------------------|--------------|---|--------|----------------|--------------|--|---|--|--|
| Company Name: Southern Aluminum Co., Inc.   |               |                   |              | Permit/Project #:   |        |                |              |  |   |  |  |
| Address: #5 Hwy 82 West<br>Magnolia, AR 71753   |               |                   |              | Purchase Order #:   |        |                |              |  |   |  |  |
| Telephone: 800-221-0408   |               |                   |              | Work Order #:   |        |                |              |  |   |  |  |
| Fax: 870-234-4665   |               |                   |              | Sampler Name(s):  |        |                |              |  |   |  |  |
| Contact: Ms. Colleen Tuggle   |               |                   |              | and Signature(s):   |        |                |              |  |   |  |  |
| ESC Client Number: 2754   |               |                   |              |   |        |                |              |  |   |  |  |
| Sample Identification   |               | Sample Collection |              | Sample Containers   |        |                |              |  |   |  |  |
| Identification  | ESC Control # | Date              | Time         | Type  | Matrix | Type           | Volume       | Preservative   | # |  |  |
| WASH # 1  | 1207010212    | 7-6-12            | 3:15pm       | Grab  | Water  | Plastic        | 1 Liter      | NaOH+Ascorbic  | 1 | X  |  |
| Rinsed # 2  | 1207010213    | 7-6-12            | 3:25pm       | Grab  | Water  | Plastic        | 1 Liter      | none   | 1 | X  |  |
| Rinsed # 3  | 1207010214    | 7-6-12            | 3:05pm       | Grab  | Water  | Glass          | 1 Liter      | HNO3 *   | 1 | X  |  |
| Combined  | 1207010215    |                   |              |   |        |                |              |  |   |  |  |
| Retrieved By: (Signature and Printed Name)<br><i>Wendy Strauss</i>                    |               | Date<br>7-6-12    | Time<br>3:30 | Received By: (Signature and Printed Name)<br><i>Wendy Strauss</i> |        | Date<br>7-6-12 | Time<br>1530 | Custody Seals:<br>Used? <input type="checkbox"/> Inact? <input type="checkbox"/> |   |  |  |
| Retrieved By: (Signature and Printed Name)<br><i>Wendy Strauss</i>                    |               | Date<br>7-9-12    | Time<br>1630 | Received By: (Signature and Printed Name)<br><i>Wendy Strauss</i> |        | Date<br>7-9-12 | Time<br>1630 | Turnaround:<br>Regular <input type="checkbox"/> Special <input type="checkbox"/> |   | Were samples properly preserved:<br>Yes <input type="checkbox"/> No <input type="checkbox"/> |  |
| All samples cooled to ≤ 6 deg C with ice.   |               |                   |              | Flow Data   |        |                |              | Field Test   |   |  |  |
| Comments: Cd(48.PS), Cr(24.PS), Cu(29.PS), Pb(82.PS), Ni(28.PS), Ag(47.PS), Zn(30.PS) |               |                   |              | Analyst:  |        |                |              | pH:  |   |  |  |
|   |               |                   |              | Reading:  |        |                |              |  |   |  |  |
|   |               |                   |              | Units:  |        |                |              |  |   |  |  |
|   |               |                   |              | Chlorinated? Y N  |        |                |              | Fecal Start:   |   |  |  |
| * Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.                 |               |                   |              |   |        |                |              |  |   |  |  |

## Attachment 2

### Sampling Point Configuration

