

Wilson, Tabatha

From: Gilliam, Allen
Sent: Monday, September 23, 2013 9:31 AM
To: Bernie K. Finch; Russell Thomas
Cc: jfarrar@southernaluminum.com; Colleen Tuggle; Wilson, Tabatha; Fuller, Kim; Anderson, Alan
Subject: AR0043613_Southern Aluminum ARP001059 Sept 2013 Zn Non Compliance Notification and ADEQ reply_20130923
Attachments: Southern Aluminum 08282013 Discharge.pdf

Colleen,

Your (corrected) Zn non-compliance notification was received per 40 CFR 403.12(g)(2). It was previously understood because of your batch discharge frequency Southern Aluminum could not submit a repeat analysis within the required 30 day time frame.

Based on the statement below: "We are increasing the frequency to once every two weeks and will sample and assess the discharge", this office will expect a repeat analysis within 30 days in the future if violations recur (excepting the next report. Please provide these analytical results [at least for Zn] as soon as the results become available to you).

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Alan Anderson, Enforcement Administrator
Russell Thomas, Magnolia Wastewater Superintendent
Bernie Finch, Finch Environmental

E/NPDES/NPDES/Pretreatment/Reports

From: Bernie K. Finch [<mailto:bkfinch@sbcglobal.net>]
Sent: Friday, September 13, 2013 9:07 AM
To: Gilliam, Allen; Russell Thomas
Cc: jfarrar@southernaluminum.com; Colleen Tuggle; Bernie Finch
Subject: Discharge to City of Magnolia Sanitary Sewer System

Mr. Thomas and Mr. Gilliam,

Please disregard the email sent from this office previously today. The date of the discharge was incorrect. The date was in fact August 28, 2013. I apologize for the confusion.

A sample was taken on wastewater at Southern Aluminum Company on **August 28, 2013** that was discharged to the City of Magnolia. In accordance with 40 CFR 403.12(G)(2) we are notifying you of the results of the analysis.

Zinc (total) was shown to be 1.934 parts per million (mg/l) for the discharge on that date. This concentration (for Zinc, total) is above the limit shown at 40 CFR 433.17 of 1.48 mg/l (monthly average). The discharge was, however, compliant with the daily maximum limit of 2.61 mg/l for Zinc, total. Since the discharge from the plant is done on the basis of a batch

and only one discharge was made during the month of August the monthly average is the limiting pretreatment standard. I have attached a copy of the analytical results with the chain of custody form.

Compliance with all other 40 CFR 433.17 pollutants/parameters was achieved. Additionally, pH was indicated to be 7.7 s.u. which is well within the acceptable range.

We are planning to increase our discharge frequency (to the City sanitary sewer system) to a more frequent basis from the plant will result in water that has a reduced concentration of Zinc (total) and will result in compliant discharges in the future. The referenced discharge occurred, based on a monthly batch discharge schedule. We are increasing the frequency to once every two weeks and will sample and assess the discharge.

Please let me know if you have questions.

Thank you.

Bernie K. Finch

Finch Environmental, PLC

9 Heritage Park Circle

North Little Rock, AR 72116

Telephone/Facsimile: 501.771.6940

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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: 1308010500
Customer Name : SOUTHERN ALUMINUM CO., INC.
Customer Number : 2754
Report Date : 09/10/13

Sample Date : 08/28/13
Sample Time : 1310
Sample Type : GRAB WATER
Sample From :

Collected By: JK CT
Delivery By : UPS
Work Order :
Purchase Order :

Laboratory Analysis

Analysis

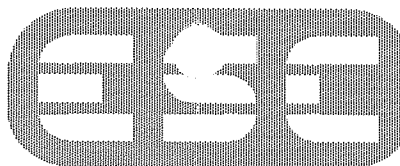
<u>Date</u>	<u>Time</u>	<u>By</u>	<u>Parameter</u>	<u>Result</u>	<u>Notes</u>	<u>Quantity</u>	<u>Method</u>	<u>Precision</u>	<u>Accuracy</u>
								<u>% RPD</u>	<u>% Recover</u>
09/06	1015	NTR	Cyanide Total (as CN)	< 0.0100 mg/L			1999 4500-CN E	1.23	96.7
08/28	1310	JK	pH	7.7 S.U.			2000 4500 H+B		
09/03	1108	RAH	Chromium	< 1.00 ug/L			EPA 200.8	4.86	91.2
09/03	1108	RAH	Nickel	14.70 ug/L			EPA 200.8	1.23	94.6
09/03	1108	RAH	Copper	7.30 ug/L			EPA 200.8	0.74	96.1
09/03	1108	RAH	Zinc	1934.81 ug/L			EPA 200.8	19.76	100.0
09/03	1108	RAH	Silver	< 0.05 ug/L			EPA 200.8	3.46	81.6
09/03	1108	RAH	Cadmium	< 0.10 ug/L			EPA 200.8	0.64	87.0
09/03	1108	RAH	Lead	< 0.50 ug/L			EPA 200.8	2.56	91.2

* 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.



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 (g) Metals (See Comments)										
Address: #5 Hwy 82 West				Purchase Order #:														
Magnolia, AR 71753				Work Order #:														
Telephone: 800-221-0408				Sampler Name(s): <u>Jeff Farrar</u> <u>Colleen Tuggle</u>														
Fax: 870-234-4665				and Signature(s): <u>[Signatures]</u>														
Contact: Ms. Colleen Tuggle				ESC Client Number: 2754														
Sample Identification		Sample Collection				Sample Containers												
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#	Cyanide (g)	Metals (See Comments)							
	1308010500	8-28-13	1:10	Grab	Water	Plastic	1 Liter	NaOH+Ascorbic	1	X								
		8-28-13	1:10	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>[Signature]</u> Colleen Tuggle		8-28-13	1:10	<u>[Signature]</u> Tina Hall		8-29-13	1045	Used? <input type="checkbox"/> Intact? <input type="checkbox"/>										
Relinquished By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Turnaround:										
<u>[Signature]</u> JEFF FARRAR		8-28-13	1:10	<u>[Signature]</u> Tina Hall		8-29-13	1100	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:										
<u>[Signature]</u> Tina Hall		8-29-13	1100	<u>[Signature]</u> Ned Rycus		8-29-13	1100	Yes <input 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							
						pH: 7.7	1:10pm	Jeff	client									
* Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.						Fecal Start:			This Document is Page ___ of ___									