

Waller, Scott

From: Gilliam, Allen
Sent: Monday, October 01, 2012 2:51 PM
To: Leon Ryan (lryan@southernaluminum.com); Colleen Tuggle (ctuggle@southernaluminum.com)
Cc: jfarrar@southernaluminum.com; Bernie K. Finch; Wastewater System Magnolia; Waller, Scott; Uyeda, Craig; Anderson, Alan
Subject: AR0043613_Southern Aluminum ARP00159 Sept 2012 Compliance Report reply_20121001 AFIN 1400727
Attachments: Southern Aluminum 09172012 Sample Results.pdf

Dear Mr. Ryan,

It appears from the analytical results (attached) sent by Finch Environmental a more frequent batch discharge from your wash tank combined with its rinse waste water may result in future compliance with the Zn monthly average Metal Finishing limit in 40 CFR 433.17. All of the parameters' analytical results showed compliance the Federal Metal Finishing limitations under 40 CFR 433.17.

Per ADEQ's compliance assurance visit's (CAV - dated 5/4/12) requirements: 1) a. Southern Aluminum (SA) must sample and analyze its wastewater on the day it batch discharges wastewater from its wash tank and submit results to ADEQ; i. "Semi-Annual" reports will no longer apply. "Discharge" reports/sampling results will be submitted after batch discharge of the Wash tank and when the Dip tank is batch discharged..."

Please resubmit the remaining/completed pages of the "Semi-Annual" ("periodic" for Zn and pH [see below]) report which includes the two (2) required signed certification statements, flow (gallons batch discharged), etc. Again, these reports can be sent electronically to this office as long as the signatures are legible.

The attached analyticals indicated while discharging/sampling, your pH measurement was 3.4 s.u. Per 40 CFR 403.12(b) "*Specific Prohibitions*. In addition, the following pollutants shall not be introduced into a POTW: (2) Pollutants which will cause corrosive structural damage to the POTW, but in no case Discharges with pH lower than 5.0, unless the works is specifically designed to accommodate such Discharges..."

Until ADEQ receives a statement from the City of Magnolia allowing discharges with a pH lower than 5 s.u., SA must adjust its pH to meet the Federal Pretreatment prohibited standard of 5 s.u. The City's current pretreatment Ordinance #95-12 has that same prohibition.

It is realized this issue was discussed during the 4/3/12 CAV and it was surmised a relatively short period/small volume of discharge at a pH less than 5 s.u. should not be an issue with the City's collection system, but what effect does that acidic discharge have on your service line to the City?

A statement from the City must be on file approving a pH limit lower than 5 s.u. in Southern Aluminum's discharge.

Southern Aluminum's Compliance Reports

Based on previous compliance reports, this office sees no reason for SA to analyze all the parameters in 40 CFR 433.17 except for the problematic parameters Zinc and pH each time it batch discharges its wash or dip tank.

At this time SA's periodic reports are due after each batch discharge from the wash tank and/or the dip tank for Zn and pH only.

Semi-annual reports may continue for all the parameters in 40 CFR 433.17 and pH during which SA batch discharges either its wash or dip tank (as close to possible during the months of January and July although we can be flexible on these two months depending on your batch discharge schedule and are 6 months apart).

If there are further questions please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Russell Thomas/City of Magnolia Wastewater Manager
Bernie Finch/Finch Environmental
Craig Uyeda/NPDES Enforcement Branch Manager
Alan Anderson/NPDES Enforcement Analyst

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

Sent: Friday, September 28, 2012 4:36 PM

To: Gilliam, Allen

Cc: Colleen Tuggle; Jeff Farrar; Bernie Finch

Subject: Southern Aluminum ARP00159

Allen,

Please see the attached results from a sample taken on the wash tank (core process) and rinse tank (ancillary process) commingled and batch discharged to the City of Magnolia on September 17, 2012.

The laboratory results indicate the batch discharge was in compliance with PSNS found at 40 CFR 433.17. In the future, Southern Aluminum is set to discharge once every two months from the wash tank while commingling the ancillary stream from the rinse tank. The annual dip tank (core process) batch discharge is to occur in mid-November and will be sampled and analyzed for 433.17 metals and cyanide. I will forward these results to you soon after I receive them from the laboratory.

I confirmed with the plant by telephone today that the sample taken on 09/17/2012 was taken correctly. Discharging from the core process (wash tank) more frequently appears to be an option for compliance. It appears that changing the phosphatizing agent (Steelcote) more often results in wastewater with compliant levels of heavy metals.

Continued, consistent regulatory compliant batch discharges from the rinse and wash sources combined will, of course, increase confidence that this is a viable method of compliance.

Southern Aluminum will make your office aware of the results of sampling/testing events and will be prepared to act accordingly to consistently achieve compliance.

Thank you.

Sincerely,

Bernie K. Finch

Finch Environmental, PLC

9 Heritage Park Circle

North Little Rock, AR 72116

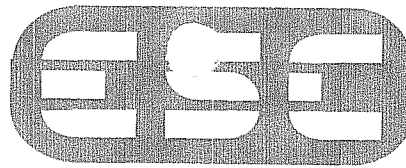
Telephone/Facsimile: 501.771.6940

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www.finchenvironmental.com

ec Colleen Tuggle, Southern Aluminum
Jeff Farrar, Southern Aluminum
File

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 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)	pH(23.)	Metals (See Comments)						
Address: #5 Hwy 82 West						Purchase Order #:													
Magnolia, AR 71753						Work Order #:													
Telephone: 800-221-0408						Sampler Name(s): Leon Ryan													
Fax: 870-234-4665						and Signature(s): <i>Leon Ryan</i>													
Contact: Ms. Colleen Tuggle						ESC Client Number: 2754													
Sample Identification		Sample Collection				Sample Containers													
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#										
	209010316	9-17-12	4:00pm	Grab	Water	Plastic	1 Liter	NaOH+Ascorbic	1	X									
				Grab	Water	Plastic	1 Liter	none	1		X								
				Grab	Water	Glass	1 Liter	HNO3 *	1			X							
Relinquished By: (Signature and Printed Name) <i>Leon Ryan</i>		Date	Time	Received By: (Signature and Printed Name) <i>Cindy Strauss</i>		Date	Time	Custody Seals:		Used?	Intact?								
		9-17-12	4:00			9-18-12	1025			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>								
Relinquished By: (Signature and Printed Name) <i>Cindy Strauss</i>		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Turnaround:		Regular	Special								
		9-18-12	1140							<input checked="" type="checkbox"/>	<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:		Yes	No								
				<i>Richard Hill</i>		9-18-12	1140			<input checked="" type="checkbox"/>	<input type="checkbox"/>								
All samples cooled to ≤ 6 deg C with ice.						Flow Data	Field Test	Time	Analyst	Result	Result	Units							
Comments: Cd(48.PS), Cr(24.PS), Cu(29.PS), Pb(82.PS), Ni(28.PS), Ag(47.PS), Zn(30.PS)						Analyst:	pH:	4:00pm	Leon	3.4									
						Time:													
						Reading:													
						Units:													
* Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.						Chlorinated? Y N	Fecal Start:						This Document is Page 1 of 1						

Directions

7:00 83°F