

## Jamie Belcourt (adpce.ad)

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**From:** Jamie Belcourt (adpce.ad)  
**Sent:** Wednesday, April 5, 2023 4:18 PM  
**To:** 'Bernie K Finch'  
**Cc:** dmiller@southernaluminum.com; Russell Thomas; Stacie Wassell (adpce.ad)  
**Subject:** Southern Aluminum - ARP001059 - July 2023 Semiannual Report

Hello Mr. Finch,

Thank you for submitting Southern Aluminum's July 2023 semiannual pretreatment report for the January 1, 2023 – June 30, 2023 reporting period. This report was received early, reviewed, and deemed complete with the reporting requirements in 40 C.F.R. § 403.12(e) and more specifically in compliance with the Metal Finishing standards in 40 C.F.R. § 433.17.

Within Section 3(B) of the provided report, it is noted that the contents of the dip tank continue to be hauled off-site as needed and properly disposed of. In addition, this Section also states that Bills of Lading (BOL) from disposal is submitted to this office. However, I have not received any copies of BOL with your report. Please provide this documentation to me.

In addition, I did notice issues with holding time on the chain of custody and analytical report documentation that was submitted. Specifically, the first sample was taken on February 7, 2023 and was received in the laboratory for analysis on the same date. Analysis was not conducted for seven (7) of the analytes (cadmium, chromium, copper, lead, nickel, silver, and zinc) until February 13, 2023, and analysis for cyanide was not conducted until February 17, 2023. This is a period of six (6) days for the aforementioned seven (7) analytes and 10 days for cyanide, following sample collection. In addition, when the samples were received at the laboratory for analysis it was not indicated on the chain of custody that custody seals were placed on the sample bottles or the shipping container.

In the future, please ensure that a collected samples are analyzed as soon as possible. As a general reminder, the maximum holding time for cyanide analysis is 14 days.

In addition, please be sure to follow proper sampling procedures and ensure that custody seals are intact. Future instances of noncompliance with the procedures set forth in 40 C.F.R. § 136 may result in enforcement action.

Please reply to this email to let me know that you have received it.

If you have any questions or concerns, or if I can be of any assistance, please do not hesitate to reach out.

Thank you,

**Jamie Belcourt** | State Pretreatment Coordinator  
**Division of Environmental Quality | Office of Water Quality**  
**Policy and Administration**  
5301 Northshore Drive | North Little Rock, AR 72118  
t: 501.682.0858 | c: 501.287.8714 | e: [jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)



**ARKANSAS**  
ENERGY & ENVIRONMENT

# 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

<p><b>A. LEGAL NAME &amp; MAILING ADDRESS</b></p> <p>Southern Aluminum Manufacturing Acquisition, Inc. P.O. Box 884 Magnolia, AR 71754</p>	<p><b>B. FACILITY &amp; LOCATION ADDRESS</b></p> <p>Southern Aluminum Manufacturing Acquisition, Inc. 5 Highway 82 West Magnolia, AR 71753</p>
<p><b>C. FACILITY CONTACT:</b> Darla Miller      <b>TELEPHONE NUMBER:</b> 870.234.8660      <b>e-mail:</b> dmiller@southernaluminum.com</p>	

## (2) REPORTING PERIOD--FISCAL YEAR 2022 (Both Semi-Annual Reports must cover Fiscal Year)

<p><b>A. MONTHS WHICH REPORTS ARE DUE</b></p> <p>July and December for each semi-annual reporting period.</p>	<p><b>B. PERIODS COVERED BY THIS REPORT</b></p> <p><b>FROM:</b> January 1, 2023      <b>TO:</b> June 30, 2023</p>
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## (3) DESCRIPTION OF OPERATION

<p><b>A. REGULATED PROCESSES</b></p> <p><u><b>CORE PROCESS(ES)</b></u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><input checked="" type="checkbox"/> Electroplating  <input checked="" type="checkbox"/> Electroless Plating  <input checked="" type="checkbox"/> Anodizing  <input type="checkbox"/> Coating  <input checked="" type="checkbox"/> Chemical Etching and Milling  <input checked="" type="checkbox"/> Printed Circuit Board Manufacture</p> <p><u><b>ANCILLARY PROCESS(ES)</b></u></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p><u>Coating</u> _____</p> <p><u>Cleaning</u> _____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>	<p><b>B. CHANGES:</b>      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.</p> <p><u>Discharges from Southern Aluminum Manufacturing Acquisition, Inc. plant to the municipal collection system typically contains water from the "wash tank" and two (2) "rinse tank(s)" with a semi-annual analysis (40 CFR 433.17 PSNS) and a Semi-Annual Report completed on these commingled waste streams. The samples consisted of: a discharge from the wash tank and the rinse tanks. The "wash tank" and the "rinse tanks" are both considered core and/or ancillary processes.</u></p> <p><u>"Dip tank" contents continue to be hauled off site as needed and properly disposed of with bills of lading submitted to the appropriate authorities (ADEQ and the City of Magnolia Water and Sewer System) which will indicate the volume and final disposal site.</u></p>
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\*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

C. Number of Regular Employees at this Facility 135

D. [Reserved]

**(4) FLOW MEASUREMENT**

INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN *GALLONS PER DAY*

Process	Average	Maximum	Type of
Regulated (Core & Ancillary)	See note below	See note below	2710
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
<b>Total Flow to POTW</b>	See note below	See note below	2710

\*\*"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

\*\*Indicate if these Streams commingle with Regulated Streams BEFORE treatment

**(5) MEASUREMENT OF POLLUTANTS**

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'
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	0.005	0.041	0.071	0.010	0.023	0.001	1.76	0.010	N/A
Ave Measured	0.005	0.041	0.071	0.010	0.023	0.001	0.93	0.010	--

Sample Location Grab samples taken of wash tank and rinse tanks water prior to discharge to municipal collection system.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency Two (2) samples collected 02/07/2023 and 03/03/2023

40 CFR 136 Preservation and Analytical Methods Use:  Yes No

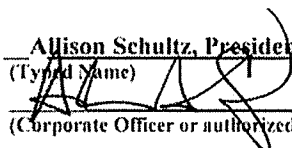
Indicate Combined Wastestream Factor if Dilution Streams Exist w/Regulated Streams N/A

**(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.

Allison Schultz, President  
(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.

Allison Schultz, President  
(Typed Name)

  
(Corporate Officer or authorized representative)

Date of Signature 3/27/23

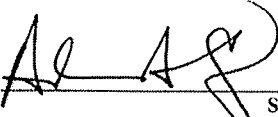
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(7) POLLUTION PREVENTION ACT OF 1990 142 U.S.C. 13101 et seq.1

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.

Allison Schultz  
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

President  
OFFICIAL TITLE

  
SIGNATURE

3/27/23  
DATE SIGNED

*'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: None**

**(8) GENERAL COMMENTS**

**Flow (Discharge)**

Southern Aluminum batch discharges to the City of Magnolia POTW in the following manner:

**Rinse Tank (2): (Capacity: 705 gallons x 2 = 1410 gallons)**

**Wash Tank (Capacity: 1300 gallons)**

**\*Samples taken 02/07/2023 and 03/03/2023 was of commingled Wash Tank and Rinse Tanks.**

**(9) SIGNATORY REQUIREMENTS [40CFR403.12(I)]**



# 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: 2302010304  
 Customer Name : SOUTHERN ALUMINUM CO., INC.  
 Customer Number : 2754  
 Report Date : 02/22/23

Sample Date : 02/07/23  
 Sample Time : 0810  
 Sample Type : GRAB WATER  
 Sample From : WASH + RINSE

Collected By: TOBY DAVIS  
 Delivery By : RRJ  
 Work Order :  
 Purchase Order :

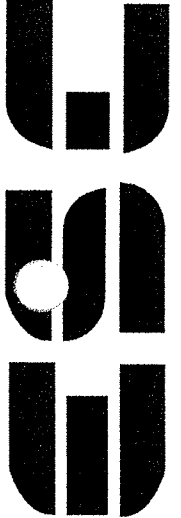
### Laboratory Analysis

Analysis		Parameter		Result	Notes	Quantity	Method	Quality Assurance	
Date	Time By							Precision	Accuracy
		Total (HACH 10265)						% RPD	% Recover
02/17	1630 NTR	Cyanide		< 0.0100	mg/L		SM 2016	4.88	102.5
02/13	1905 JFT	Chromium		41.17	ug/L		EPA1994	0.71	98.0
02/13	1905 JFT	Nickel		23.33	ug/L		EPA 200.8	0.10	94.8
02/13	1905 JFT	Copper		71.04	ug/L		EPA 200.8	0.05	93.8
02/13	1905 JFT	Zinc		1764.77	ug/L		EPA 200.8	0.40	92.5
02/13	1905 JFT	Silver		< 1.0	ug/L		EPA1994	0.19	103.1
02/13	1905 JFT	Cadmium		< 5.00	ug/L		EPA1994	2.16	96.9
02/13	1905 JFT	Lead		< 10.00	ug/L		EPA 200.8	0.23	92.5

\* 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.



# CHAIN OF CUSTODY

Springdale, Arkansas  
479-750-1170

Carlsbad, New Mexico  
575-887-1ESC

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)

Phone: 501-221-2565 Fax: 501-221-1341

Client Information					Project Information					Requested Parameters				
Client: Southern Aluminum Co., Inc. Address: #5 Hwy 82 West Magnolia, AR 71753 Phone: 800-221-0408 Fax: 870-234-4665 Contact: Mr. Steve Collins ESC Client Number: 2754					Permit/Project #: _____ Purchase Order #: _____ Work Order # 012423-NTR1 Sampler Name(s): <i>Toby Davis</i> and Signature(s): <i>Toby Davis</i>					Metals (See Comments)  Cyanide(9) <input type="checkbox"/> X X				
Sample Identification			Sample Collection		Sample Containers									
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#					
<i>Wash + Rinse</i>	<i>230200304</i>	<i>2-7-23</i>	<i>8:10</i>	Grab	Water	Plastic	8 pz	NaOH	1					
				Grab	Water	Plastic	8 oz	HNO3 to pH <2*	1					
Relinquished By: (Signature and Printed Name) <i>Toby Davis</i> Date <i>2-8-23</i> Time <i>8:10</i> Relinquished By: (Signature and Printed Name) <i>Toby Davis</i> Date <i>2-8-23</i> Time <i>8:10</i> Relinquished By: (Signature and Printed Name) _____     Date _____     Time _____										Custody Seals: Used? <input type="checkbox"/> Intact? <input type="checkbox"/> Turnaround: _____ Regular <input type="checkbox"/> Special <input type="checkbox"/> Were samples properly preserved: 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), 00.MD					Flow Data     pH: _____ Analyt: _____ Time: _____ Reading: _____ Units: _____					Result     Result     Result     Result     Result _____     _____     _____     _____     _____     _____				
* Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.										This Document is Page 1 of 1				

# 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: 2303010242  
 Customer Name : SOUTHERN ALUMINUM CO., INC.  
 Customer Number : 2754  
 Report Date : 03/21/23

Sample Date : 03/03/23  
 Sample Time : 0800  
 Sample Type : GRAB/WATER  
 Sample From : WASH & RINSE

Collected By: TOBY DAVIS  
 Delivery By : TOBY DAVIS  
 Work Order :  
 Purchase Order :

<u>Laboratory Analysis</u>			
Analysis Date	Time	BY	Parameter
03/13	1331	JFT	Zinc
			Result
			0.0952 mg/L
			Notes
			Quantity
			Method
			EPA 200.8
			Precision
			% RPD
			0.36
			Quality Assurance
			Accuracy
			% Recovered
			99.6 %

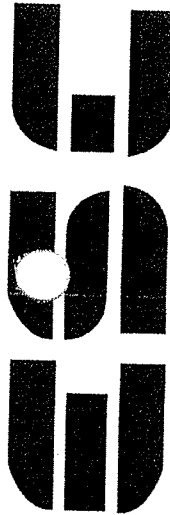
\* QA data shown is from a different sample or standard on the same date.

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 *John W. Worthy*  
 Environmental Services Co., Inc.

ACF

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



Phone: 501-221-2565 Fax: 501-221-1341

Springdale, Arkansas  
 479-750-1170  
 Carlsbad, New Mexico  
 575-887-1ESC

# CHAIN OF CUSTODY

Client Information				Project Information				Requested Parameters			
Client: Southern Aluminum Co., Inc.				Permit/Project #:							
Address: #5 Hwy 82 West				Purchase Order #:							
Phone: Magnolia, AR 71753				Work Order #:				230224-NTR2			
Fax: 800-221-0408				Sampler Name(s):				Toby Davis			
Contact: Ms. Donna Miller				and Signature(s):				Toby Davis			
ESC Client Number: 2754											
Sample Identification		Sample Collection		Sample Containers							
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#		
Wash + Rinse	2703010242	3-3-23	8:00	Grab	Water	Plastic	8 oz	HNO3 to pH <2*	1	X	Zn (30.HW), 00.MD
Relinquished By: (Signature and Printed Name) <i>Toby Davis</i> Toby Davis Date: 3-3-23 Time: 8:00 Received By: (Signature and Printed Name) <i>Mail</i> Date: 3-6-23 Time: 10:32 Relinquished By: (Signature and Printed Name) <i>Mail</i> Date: 3-6-23 Time: 10:32 Received By: (Signature and Printed Name) <i>John J. White</i> Date: 3-6-23 Time: 10:32 Field Test: pH: _____ Analyst: _____ Time: _____ Reading: _____ Units: _____											
Comments: * Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.											
CUSTODY SEALS: Used? <input type="checkbox"/> Intact? <input type="checkbox"/> Turnaround: Regular <input type="checkbox"/> Special <input type="checkbox"/> Were samples properly preserved: Yes <input type="checkbox"/> No <input type="checkbox"/>											
This Document is Page 1 of 1											

*JD*

Directions