

**From:** [Belcourt, Jamie](#)  
**To:** ["Bernie K Finch"; dmiller@southernaluminum.com](#); [Russell Thomas](#)  
**Cc:** [Wassell, Stacie](#)  
**Subject:** RE: ARP001059 - Southern Aluminum Manufacturing Acquisition, Inc. - Semi-Annual Report  
**Date:** Monday, August 22, 2022 1:19:29 PM  
**Attachments:** [image003.png](#)  
[image004.png](#)

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Hello,

Thank you for submitting Southern Aluminum's (Pretreatment ID ARP001059 & AFIN 14-00727 ) July 1, 2022 – December 31, 2022 semiannual pretreatment report. The report was received, reviewed, and deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically in compliance with the Metal Finishing standards in 40 CFR 433.17. However, the OWQ did notice issues with sampling procedures and holding times on the chain of custody and analytical report documentation that was submitted. Specifically, the sample was taken on July 26, 2022 and was received in the laboratory for analysis on the same date. Analysis was not conducted for cyanide until July 29, 2022, and the remaining seven (7) analytes (cadmium, chromium, copper, lead, nickel, silver, and zinc) were not analyzed until August 4, 2022. This is a period of three (3) days for cyanide analysis and nine (9) days for the other analytes, following sample collection. In addition, when the sample was received at the laboratory for analysis it did not indicate that there was a custody seal on the sample bottle or the shipping container. In the future, please ensure that a collected sample(s) is/are analyzed as soon as possible. In addition, please be sure to follow proper sampling procedures and ensure that custody seals are utilized and intact. Future instances of noncompliance with the procedures set forth in 40 CFR Part 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** | Pretreatment Coordinator

**Division of Environmental Quality | Office of Water Quality**

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.682.0858 | e: [jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)



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**From:** Belcourt, Jamie

**Sent:** Monday, August 22, 2022 8:07 AM

**To:** 'Bernie K Finch'; Pretreatment-Submittals; dmiller@southernaluminum.com; Russell Thomas

**Subject:** RE: ARP001059 - Southern Aluminum Manufacturing Acquisition, Inc. - Semi-Annual Report  
Received, thank you.

**Jamie Belcourt** | Pretreatment Coordinator

**Division of Environmental Quality | Office of Water Quality**

5301 Northshore Drive | North Little Rock, AR 72118  
t: 501.682.0858 | e: [jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)



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**From:** Bernie K Finch [<mailto:bkfinch@sbcglobal.net>]  
**Sent:** Friday, August 19, 2022 10:55 AM  
**To:** Pretreatment-Submittals; dmiller@southernaluminum.com; Russell Thomas; Bernie K Finch  
**Subject:** ARP001059 - Southern Aluminum Manufacturing Acquisition, Inc. - Semi-Annual Report

Dear Mr. Manasco,

Please see attached the Semi-Annual Report for Southern Aluminum Manufacturing Acquisition, Inc.

The submittal is being made electronically at the request of the Office of Water Quality, Arkansas DEQ.

Thank you.

***Bernie K. Finch***

Finch Environmental, PLC

P.O. Box 99

Vendor, AR 72683-0099

p/t:501-771-6940

[www.finchenvironmental.com](http://www.finchenvironmental.com)

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**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>
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**C. FACILITY CONTACT:** Darla Miller      **TELEPHONE NUMBER:** 870.234.8660      **e-mail:** dmiller@southernaluminum.com

**(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> July 1, 2022      <b>TO:</b> December 31, 2022</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 sample 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. Grab sample was marked “stormwater” by mistake. Sample was in fact from wash and rinse tanks.</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
Total Flow to POTW	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**

A. TYPE OF TREATMENT SYSTEM

B. COMMENTS ON TREATMENT SYSTEM

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	0.020	0.052	0.024	0.019	0.014	0.041	0.119	0.010	N/A
Ave Measured	0.020	0.052	0.024	0.019	0.014	0.041	0.119	0.010	--



Sample Location Grab sample 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 One (1) sample collected 07/26/2022

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 8-19-22

Intentionally left blank

*' 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)**

**\*Sample (taken 07/26/2022) was of commingled Wash Tank and Rinse Tanks.**

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

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

  
SIGNATURE

President  
President/CEO  
OFFICIAL TITLE

8/19/22  
DATE SIGNED



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: 2207010508      Sample Date : 07/26/22      Collected By: UNKNOWN  
 Customer Name : SOUTHERN ALUMINUM CO., INC.      Sample Time : UNKNOWN      Delivery By : UPS  
 Customer Number : 2754      Sample Type : GRAB/WATER      Work Order :  
 Report Date : 08/18/22      Sample From : STORM WATER      Purchase Order :

Analysis			Laboratory Analysis				Quality Assurance		
Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
07/29	0415	NTR	Cyanide Total (HACH 10265	< 0.0100 mg/L			SM 2011 4500-CN E	8.70	96.7
08/04	1644	JFT	Chromium	52.30 ug/L			EPA 200.8	0.42	104.9 *
08/04	1644	JFT	Nickel	14.25 ug/L			EPA 200.8	2.00	101.1 *
08/04	1600	JFT	Copper	24.18 ug/L			EPA 200.8	6.03	101.0 *
08/04	1600	JFT	Zinc	119.11 ug/L			EPA 200.8	7.74	99.8 *
08/04	1600	JFT	Silver	40.9 ug/L			EPA 200.8	2.19	86.8 *
08/04	1600	JFT	Cadmium	< 20.00 ug/L			EPA 200.8	1.98	93.5 *
08/04	1600	JFT	Lead	19.00 ug/L			EPA 200.8	1.90	95.1 *

\* 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 Neil Ryan  
 Environmental Services Co., Inc.

