

## Wilson, Tabatha

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**From:** Gilliam, Allen  
**Sent:** Tuesday, December 17, 2013 2:16 PM  
**To:** Colleen Tuggle (ctuggle@southernaluminum.com)  
**Cc:** Fuller, Kim; Wilson, Tabatha; magnolia russell thomas  
**Subject:** AR0043613\_Southern Aluminums ARP001059 period Zinc compliance report and ADEQ reply\_20131217  
**Attachments:** Southern Aluminums Periodic Zinc Report.pdf

Colleen,

Southern Aluminum's (SA) latest periodic report on compliance with the Metal Finishing (40 CFR 433.17) monthly average of Zinc was received on 12/13/13.

This report shows the sample was taken on 11/25/13. Coupled with the previous report with the sample taken on 11/11/13 (showing a Zinc level at 1.292), SA's November monthly average is 1.35 mg/l, not far from the Metal Finishing monthly average "not to exceed" of 1.48 mg/l. This office truly hopes the batch discharge practice of not more than two (2) weeks works in SA's favor.

Are we in agreement that two (2) more compliant Zinc periodic reports are due for two (2) samples during the month of December before SA can return to semi-annual reporting; notifying the City (Russell Thomas) 48 hours prior to batch discharge?

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Russell Thomas, Magnolia's Wastewater Manager

E/NPDES/NPDES/Pretreatment/Reports

AWRKR

**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

12/12/2013

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

periodic ZW report on compliance  
OK! AB

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

Dear Mr. Gilliam,

On behalf of Southern Aluminum Company, please accept this attached "Periodic Report" form as requested. Also included with this submittal is the laboratory analytical results and chain of custody form.

Please accept this submittal and contact me with questions.

Thank you.

Sincerely,

BK.F

Bernie K. Finch  
Finch Environmental, PLC

DEC 13 2013

119527W

Attachment

Cc Russell Thomas, City of Magnolia

**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**

**A. LEGAL NAME & MAILING ADDRESS**

Southern Aluminum  
P.O. Box 884  
Magnolia, AR 71754

**B. FACILITY & LOCATION ADDRESS**

Southern Aluminum  
5 Highway 82 West  
Magnolia, AR 71753

C. FACILITY CONTACT: Colleen Tuggle  
ctuggle@southernaluminum.com

TELEPHONE NUMBER: 870.234.8660 e-mail:

**(2) REPORTING PERIOD**

**A. MONTHS WHICH REPORTS ARE DUE**

\*This is a Periodic Batch Report

**B. PERIOD COVERED BY THIS REPORT**

**FROM: November 25, 2013 TO: November 25, 2013**

**(3) DESCRIPTION OF OPERATION**

**A. REGULATED PROCESSES**

**CORE PROCESS(ES)**

CHECK EACH APPLICABLE BLOCK

- Electroplating
- Electroless Plating
- Anodizing
- Coating
- Chemical Etching and Milling
- Printed Circuit Board Manufacture

**ANCILLARY PROCESS(ES)\***

LIST BELOW EACH PROCESS USED IN THE FACILITY

Coating \_\_\_\_\_

Cleaning \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**B. CHANGES:**

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.

\*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

**C. Number of Regular Employees at this Facility** 135  
135

**D. [Reserved]**

**(4) FLOW MEASUREMENT**

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Ancillary)	See Note Below	See Note Below	2882
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	2882

\*\*"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	N/A	N/A	N/A	N/A	N/A	N/A	1.41 ✓	N/A	TOMP (N/A)
Ave Measured	N/A	N/A	N/A	N/A	N/A	N/A	1.41 ✓	N/A	TOMP (N/A)

Sample Location Sample taken at confluence of all regulated processes (Dip Tank, Wash Tank and Rinse Tank) immediately preceding discharge to municipal collection system. Dip tank was not discharged on 11-11-2013.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency Collected one (1) collected 11-25-2013;

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.

Leon M. Ryan Vice President/General Manager

(Typed Name)

Leon Ryan  
(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.

Leon M. Ryan Vice President/General Manager

(Typed Name)

Leon Ryan  
(Corporate Officer or authorized representative)

Date of Signature 12-11-13

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: Initial submittal of a Toxic Organic Management Plan (TOMP).

**(8) GENERAL COMMENTS**

**Flow Calculations:**

Southern Aluminum batch discharged on November 25, 2013.

2050 gallons from Wash Tank (core process)

+

832 gallons from Rinse Tank (ancillary process)

= 2882 gallons to the Magnolia municipal sewer system.

pH: 7.9 s.u.

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

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.

Leon M. Ryan  
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Vice President/General Manager  
OFFICIAL TITLE

  
SIGNATURE

12-11-13  
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: 1311010585	Sample Date : 11/25/13	Collected By: J FARER/C TUGGL
Customer Name : SOUTHERN ALUMINUM CO., INC.	Sample Time : 1342	Delivery By : UPS
Customer Number : 2754	Sample Type : GRAB WATER	Work Order :
Report Date : 12/10/13	Sample From :	Purchase Order :

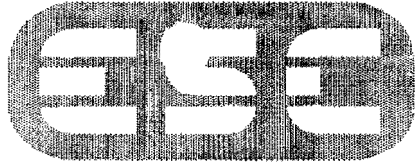
<u>Laboratory Analysis</u>						<u>Quality Assurance</u>		
<u>Analysis</u>		<u>Parameter</u>	<u>Result</u>	<u>Notes</u>	<u>Quantity</u>	<u>Method</u>	<u>Precision</u>	<u>Accuracy</u>
<u>Date</u>	<u>Time</u>	<u>By</u>					<u>% RPD</u>	<u>% Recover</u>
11/25	1342	CT	pH	7.9	S.U.	2000 4500 H+B		
12/04	1219	RAH	Zinc, Total	1411.00	ug/L	EPA 200.7	2.44	110.9

\* 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.  
 Northwest Branch  
 1107 Century  
 Springdale, AR 72764

# CHAIN OF CUSTODY

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

Project Information								Requested Parameters							
Co., Inc.		Permit/Project #:						Zinc, Total (74.ZN)							
		Purchase Order #:													
		Work Order #:													
		Sampler Name(s): * <i>JEFF FARROW</i>													
		and Signature(s): * <i>Colleen Tuggle</i>													
Sample Collection				Sample Containers											
Date	Time	Type	Matrix	Type	Volume	Preservative	#								
11-25-13	1:42 pm	Grab	Water	Plastic	8 oz	HNO3 to pH <2*	1	X							
Date		Time		Received By: (Signature and Printed Name)				Date		Time		Custody Seals:			
11-25-13		1:45 pm		<i>Richard Hall</i>				11-26-13		10:15		Used? <input checked="" type="checkbox"/> Intact? <input type="checkbox"/>			
Date		Time		Received By: (Signature and Printed Name)				Date		Time		Turnaround:			
11-25-13		1:45 pm		<i>Cindy Strauss</i>				11-26-13		10:15		Regular <input checked="" type="checkbox"/> Special <input type="checkbox"/>			
Date		Time		Received for Lab By: (Signature and Printed Name)				Date		Time		Were samples properly preserved:			
11-26-13		11:00		<i>Richard Hall</i>				11-26-13		11:00		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
Flow Data				Field Test		Time		Analyst		Result		Result		Units	
				pH: 7.9		1:42 pm									
Analyst:															
Time:															
Reading:															
Units:															
s preserved in laboratory.				Fecal Start:										This Document is Page <u>1</u> of <u>1</u>	

Directions

Revised 4-14-98