

**Gilliam, Allen**

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**From:** Gilliam, Allen  
**Sent:** Friday, December 14, 2012 10:25 AM  
**To:** 'Colleen Tuggle'  
**Cc:** 'Wastewater System Magnolia'; 'Bernie K. Finch'  
**Subject:** AR0043613\_Southern Aluminums ARP001059 December 2012 Periodic Batch Discharge Report and ADEQ reply\_20121214

Colleen,

Your periodic compliance report was received, reviewed, deemed complete and compliant with the Federal Metal Finishing limitations in 40 CFR 433. The modification of your discharge practices appears to have legally brought your wastewater into compliance. This procedure was previously described in your corrective action plan.

Would you please describe your procedure to bring your pH level up and within regulatory levels as this constitutes a change in process under 40 CFR 403.12(j)?

Please retain this and all Pretreatment correspondence for a period of three (3) years per 40 CFR 403.12(o)(2).

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Russell Thomas/City of Magnolia Wastewater Superintendent  
Bernie Finch/Finch Environmental

**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*

12/3/2012

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

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

Dear Mr. Gilliam,

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,



Bernie K. Finch  
Finch Environmental, PLC

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—FISCAL YEAR 2010 (Both Semi-Annual Reports must cover Fiscal Year)

**A. MONTHS WHICH REPORTS ARE DUE**

\*This is a Periodic Batch Report

**B. PERIOD COVERED BY THIS REPORT**

**FROM:** November 19, 2012 **TO:** November 19, 2012

## (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

**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	0.0005	0.015	0.023	0.004	0.034	0.005	0.040	0.010	TOMP (N/A)
Ave Measured	0.0005	0.015	0.023	0.004	0.034	0.005	0.040	0.010	TOMP (N/A)

Sample Location Sample taken at confluence of all regulated processes (Wash Tank and Rinse Tank) immediately preceding discharge to municipal collection system. Dip tank was not discharged on 11-19-2012.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency Collected One (1) collected 11-19-2012;

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)

\_\_\_\_\_  
(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 11-28-12

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*'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 19, 2012.**

**2050 gallons from Wash Tank (core process)**

**+**

**832 gallons from Rinse Tank (ancillary process)**

**= 2882 gallons to the Magnolia municipal sewer system.**

**pH: 7.6 s.u.**

**(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.

Leon M. Ryan  
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

  
SIGNATURE

Vice President/General Manager  
OFFICIAL TITLE

11-28-12  
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: 1211010410  
 Customer Name : SOUTHERN ALUMINUM CO., INC.  
 Customer Number : 2754  
 Report Date : 11/26/12

Sample Date : 11/19/12  
 Sample Time : 1415-1418  
 Sample Type : GRAB WATER  
 Sample From :

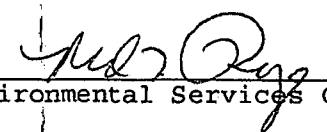
Collected By: COLLEEN TUGGLE  
 Delivery By : UPS  
 Work Order :  
 Purchase Order :

Analysis		<u>Laboratory Analysis</u>				<u>Quality Assurance</u>		
<u>Date</u>	<u>Time 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>% Recovery</u>
11/21	0840 NTR	Cyanide Total (as CN)	< 0.0100 mg/L			SM 18th 4500-CN E	0.00	98.4
11/19	1414 CT	pH	7.6 S.U.			SM 18 4500 H+B		
11/21	1243 NTR	Chromium	15.30 ug/L			EPA 200.8	4.44	92.6 *
11/21	1243 NTR	Nickel	34.33 ug/L			EPA 200.8	4.11	92.6 *
11/21	1243 NTR	Copper	22.79 ug/L			EPA 200.8	3.64	98.1 *
11/21	1243 NTR	Zinc	40.14 ug/L			EPA 200.8	7.38	84.9 *
11/21	1243 NTR	Silver	5.47 ug/L			EPA 200.8	3.41	96.2 *
11/21	1243 NTR	Cadmium	< 0.50 ug/L			EPA 200.8	1.33	92.7 *
11/21	1243 NTR	Lead	4.47 ug/L			EPA 200.8	1.16	105.1 *

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

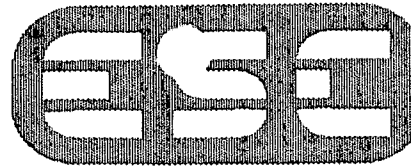
All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature \_\_\_\_\_

  
 Environmental Services Co., Inc.



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



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)	Metals (See Comments)										
Address: #5 Hwy 82 West				Purchase Order #:																	
Magnolia, AR 71753				Work Order #																	
Telephone: 800-221-0408				Sampler Name(s): Colleen Tuggle																	
Fax: 870-234-4665				and Signature(s): Colleen Tuggle																	
Contact: Ms. Colleen Tuggle				ESC Client Number: 2754																	
Sample Identification			Sample Collection			Sample Containers															
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#												
	1211010410	11-19-12	2:15pm	Grab	Water	Plastic	1 Liter	NaOH+Ascorbic	1	X											
		11-19-12	2:18pm	Grab	Water	Plastic	1 Liter	HNO3*	1	X											
Relinquished By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Custody Seals:													
C. Tuggle Colleen Tuggle		11-19-12	2:30pm	Cindy Strauss Cindy Strauss		11-20-12	1050	Used? <input checked="" type="checkbox"/> Intact? <input type="checkbox"/>													
Relinquished By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Turnaround:													
Cindy Strauss Cindy Strauss		11-20-12	1112					Regular <input checked="" 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:													
				Ned Myers - Ned Myers		11-20-12	1112	Yes <input checked="" type="checkbox"/> No <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: 7.6	2:14pm	C. Tuggle												
						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 ___ of ___											

CPT

### Directions



Finch Environmental, PLC  
9 Heritage Park Circle  
North Little Rock, AR 72116

LITTLE ROCK AR 722

03 DEC 2012 PM 9 L



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

72118531799

