

Gage, Hannah

From: Gilliam, Allen
Sent: Thursday, December 08, 2016 12:18 PM
To: 'ctuggle@southernaluminum.com'; 'aschultz@southernaluminum.com'
Cc: Gage, Hannah; Leamons, Bryan; McWilliams, Carrie; 'Bernie K. Finch'; magnolia russell thomas
Subject: AR0043613_Southern Aluminums ARP001059 December 2016 semi annual Pretreatment report_20161208
Attachments: doc03601720161208092218.pdf

Colleen and/or Allison,

Southern Aluminum's December 2016 semi-annual Pretreatment report was received from Finch Environmental, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically compliant with the Metal Finishing pretreatment standards in 40 CFR 433.17. There is no further action deemed necessary at this time.

Thank you for your timely report. Please report to Adam Yates (yates@adeq.state.ar.us) in the future.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Russell Thomas, City of Magnolia Wastewater Manager
Bernie Finch, Consultant Engineer for Southern Aluminum

E/NPDES/NPDES/Pretreatment/Reports

C5GJU

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

AG / Ay

11/17/2016

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

RECEIVED
NOV 29 2016

ARP0043613

complete/compliant
AF

Re: Southern Aluminum, Pretreatment Tracking Number ARP001059

Dear Mr. Gilliam,

Please accept the following document and supporting attachments for the referenced facility located in Magnolia, Arkansas.

In this submittal you will find the following items:

1. Semi-Annual Report for Industrial Users Regulated by 40 CFR 433;
2. The results of a sample of the regulated waste streams analyzed for Metals and Cyanide during the period beginning 07/01/2016 and ending 12/31/2016; and
3. The revised flow schematic

Analytical results of the sample taken on 10/06/2016 indicated no excursions of the daily maximum or monthly average pretreatment standards for new sources (PSNS) for metals and Cyanide.


Additionally, pH was analyzed and found to be 7.1 s.u. Southern Aluminum continues to analyze pH each time a batch discharge occurs from any regulated source and log this value.

As required by regulations the City of Magnolia is being provided a copy of this communication and supporting documentation.

Please accept this information and contact me with questions.

Thank you.

Sincerely,

Handwritten signature in blue ink, appearing to read "B.K. Finch".

Bernie K. Finch
Finch Environmental, PLC

Attachments

Cc Colleen Tuggle, Southern Aluminum (w/attachments)
Russell Thomas, City of Magnolia (w/attachments)

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>A. LEGAL NAME & MAILING ADDRESS</p> <p>Southern Aluminum P.O. Box 884 Magnolia, AR 71754</p>	<p>B. FACILITY & LOCATION ADDRESS</p> <p>Southern Aluminum 5 Highway 82 West Magnolia, AR 71753</p>
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C. FACILITY CONTACT: Colleen Tuggle **TELEPHONE NUMBER:** 870.234.8660 **e-mail:** tuggle@southernaluminum.com

(2) REPORTING PERIOD--FISCAL YEAR 2016 (Both Semi-Annual Reports must cover Fiscal Year)

<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p>July and December for each semi-annual reporting period.</p>	<p>B. PERIODS COVERED BY THIS REPORT</p> <p>FROM: July 1, 2016 TO: December 31, 2016</p>
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(3) DESCRIPTION OF OPERATION

<p>A. REGULATED PROCESSES</p> <p><u>CORE PROCESS(ES)</u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p>G Electroplating G Electroless Plating G Anodizing O Coating G Chemical Etching and Milling G Printed Circuit Board Manufacture</p> <p><u>ANCILLARY PROCESS(ES)*</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. 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.</p> <p><u>All subsequent discharges from Southern Aluminum Company to the municipal collection system will contain only rinse water with a semi-annual analysis (40 CFR 433.17 PSNS) and Semi-Annual Report completed on this single waste stream. This change is a result of the plant changing conversion coating chemicals using "zirconium phosphate" chemistry. Please see attached flow schematic.</u></p> <p><u>Wash tank and dip tank contents will 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	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

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	0.0001	0.002	0.021	0.003	0.010	0.0005	0.057	0.0186	N/A
Ave Measured	0.0001	0.002	0.021	0.003	0.010	0.0005	0.057	0.0186	--

Sample Location Flow-weighted composite samples taken of wash tank and rinse tank contributions commingled prior to discharge to municipal collection system. Dip tank did not discharge during the period 07-01-2016 through 12-31-2016.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency One (1) sample collected 10-06-2016

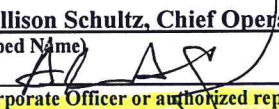
40 CFR 136 Preservation and Analytical Methods Use: Yes No

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

(6) CERTIFICATION

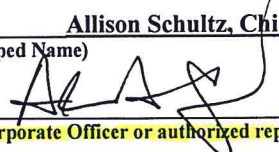
A. Required under 40 CFR 403.12(g)

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, Chief Operating Officer
(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, Chief Operating Officer
(Typed Name)

(Corporate Officer or authorized representative)
Date of Signature 11/22/16

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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: None

(8) GENERAL COMMENTS

Flow (Discharge)

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

Rinse Tank (Capacity: 832 gallons)

Wash Tank (Capacity: 2050 gallons)

Dip Tank (Capacity: 1000 gallons)*

*** Dip Tank did not discharge during the period beginning 07-01-2016 and ending 12-31-2016**

(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

Chief Operating Officer

OFFICIAL TITLE

11/22/16
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: 1610010398
 Customer Name : SOUTHERN ALUMINUM CO., INC.
 Customer Number : 2754
 Report Date : 10/14/16

Sample Date : 10/06/16
 Sample Time : 1310
 Sample Type : GRAB WATER
 Sample From : SOUTHERN ALUMINUM

Collected By: JF/CT
 Delivery By : UPS
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis							Quality Assurance		
Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
10/11	0830	NTR	Cyanide Total (as CN)	0.0186 mg/L			SM 1999 4500-CN E	1.37	101.3 *
10/06	1310	CT	pH	7.1 S.U.			SM 2000 4500-H+B		
10/12	1137	RAH	Chromium	2.00 ug/L			EPA 200.8	1.46	103.2 *
10/12	1137	RAH	Nickel	10.00 ug/L			EPA 200.8	1.11	100.4 *
10/12	1137	RAH	Copper	21.00 ug/L			EPA 200.8	2.31	102.0 *
10/12	1137	RAH	Zinc	57.00 ug/L			EPA 200.8	0.56	100.3 *
10/12	1137	RAH	Silver	< 0.5 ug/L			EPA 200.8	3.65	109.7 *
10/12	1137	RAH	Cadmium	< 0.10 ug/L			EPA 200.8	2.10	106.1 *
10/12	1137	RAH	Lead	3.00 ug/L			EPA 200.8	2.34	109.2 *

* 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.

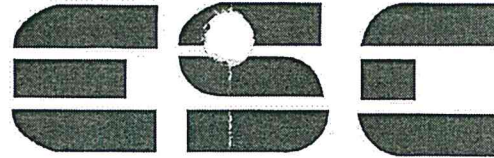
Signature _____


 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



Springdale, Arkansas
 479-750-1170

Carlsbad, New Mexico
 575-887-1ESC

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

CHAIN OF CUSTODY

Client Information				Project Information						Requested Parameters						
Company Name: Southern Aluminum Co., Inc.				Permit/Project #:						Cyanide(9) Metals (See Comments)						
Address: #5 Hwy 82 West Magnolia, AR 71753				Purchase Order #:												
Telephone: 800-221-0408				Work Order #:												
Fax: 870-234-4665				Sampler Name(s): <i>Jeff Farrar</i>												
Contact: Ms. Colleen Tuggle				and Signature(s): <i>Colleen Tuggle</i>												
ESC Client Number: 2754																
Sample Identification		Sample Collection				Sample Containers										
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#							
	1610010398	10-6-16	1:10	Grab	Water	Plastic	1 Liter	NaOH+Ascorbic	1	X						
		10-6-16	1:10	Grab	Water	Plastic	8 oz	HNO3 to pH <2*	1	X						
Relinquished By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)				Date	Time	Custody Seals:						
<i>Jeff Farrar</i>		10-6-16	1:10pm	<i>Richard Hall</i>						Used? <input type="checkbox"/> Intact? <input type="checkbox"/>						
Relinquished By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)				Date	Time	Turnaround:						
<i>Colleen Tuggle</i>		10-6-16	1:10pm	<i>Richard Hall</i>						Regular <input 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:						
				<i>Richard Hall</i>				10-7-16	1:00	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)						Flow Data	Field Test	Time	Analyst	Result	Result	Units				
						Analyst:	pH: 7.1	1:10pm								
						Time:										
						Reading:										
						Units:										
* Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.						Fecal Start:				This Document is Page ___ of ___						

Handwritten initials

Southern Aluminum
Process Schematic of Water Flow
With Tank Capacity Utilizing Zirconium Phosphate Chemistry

