

## Gage, Hannah

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**From:** Johnson, Lindsay  
**Sent:** Thursday, June 08, 2017 2:02 PM  
**To:** 'aschultz@southernaluminum.com'; 'ctuggle@southernaluminum.com'  
**Cc:** Gage, Hannah; Yates, Adam; Leamons, Bryan; McWilliams, Carrie; 'mwws@sbcglobal.net'  
**Subject:** AR0043613\_Southern Aluminums ARP001059 Early July 2017 semi annual Pretreatment report\_20170608  
**Attachments:** Southern Aluminum July 2017 semi annual report.pdf

Colleen,

Southern Aluminum's early July 2017 semi-annual Pretreatment report was received, 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. No further action is deemed necessary at this time.

Thank you and have a great day,

*Lindsay Johnson  
NPDES Staff Engineer  
ADEQ-Office of Water Quality  
(501)682-0045*

Cc: Russell Thomas, City of Magnolia Wastewater Manager

E/NPDES/NPDES/Pretreatment/Reports

B 112WN

**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

*Handwritten:* A large green checkmark with the initials 'AF' written above it.

*Handwritten:* AR0043613

5/26/2017

Mr. Adam Yates  
Pretreatment Coordinator  
Water Division  
ADEQ  
5301 Northshore Drive  
North Little Rock, AR 72118

*Handwritten:* ~~AR000628~~  
~~14-00727~~

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

Dear Mr. Yates,

On behalf of Southern Aluminum Company, please accept this attached Semi-Annual Report. 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,

*Handwritten signature:* B. K. Finch

Bernie K. Finch  
Finch Environmental, PLC

**RECEIVED**  
JUN 01 2017

Attachment

Cc (w/attachments)  
Russell Thomas, City of Magnolia

(w/ attachments)  
Colleen Tuggle, Southern Aluminum Company

**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

**TELEPHONE NUMBER:** 870.234.8660

**e-mail:** tuggle@southernaluminum.com

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

**A. MONTHS WHICH REPORTS ARE DUE**

July and December for each semi-annual reporting period.

**B. PERIODS COVERED BY THIS REPORT**

**FROM:** January 1, 2017

**TO:** June 30, 2017

**(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.

This discharges from Southern Aluminum Company to the municipal collection system contains only rinse water with a semi-annual analysis (40 CFR 433.17 PSNS) and Semi-Annual Report completed on this single waste stream.

Wash tank and 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.



\*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 | 832        |
| 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 | <b>832</b> |

\*\*"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   | 2.33  | 0.24   | 1.48  | 0.65   | --   |
| Max Measured    | 0.0007 | 0.003 | 0.005 | 0.0005 | 0.002 | 0.0005 | 0.028 | 0.0100 | N/A  |
| Ave Measured    | 0.0007 | 0.003 | 0.005 | 0.0005 | 0.002 | 0.0005 | 0.028 | 0.0100 | --   |

Sample Location Grab sample taken of rinse tank prior to discharge to municipal collection system.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency One (1) sample collected 05-16-2017

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)

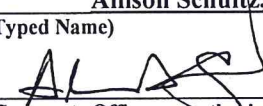
  
(Corporate Officer or authorized representative)

**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 5/26/17

Intentionally left blank

**(7) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]**

*'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)**

**(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

5/26/17  
DATE SIGNED

Attachments to Semi-Annual Report

Southern Aluminum Company, Inc.  
Pretreatment Tracking Number ARP001059

Analytical Laboratory Results  
Chain of Custody form

May 27, 2017

Finch Environmental, PLC



# 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: 1705010579  
 Customer Name : SOUTHERN ALUMINUM CO., INC.  
 Customer Number : 2754  
 Report Date : 05/23/17

Sample Date : 05/16/17  
 Sample Time : 1600  
 Sample Type : GRAB WATER  
 Sample From : UNKNOWN

Collected By: TD, CT  
 Delivery By : SHIPPED  
 Work Order :  
 Purchase Order :

### Laboratory Analysis

### Quality Assurance

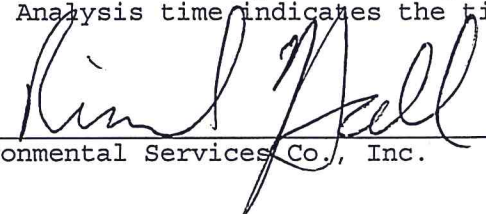
| Analysis |      |     | Parameter             | Result        | Notes | Quantity | Method            | Quality Assurance |            |
|----------|------|-----|-----------------------|---------------|-------|----------|-------------------|-------------------|------------|
| Date     | Time | By  |                       |               |       |          |                   | % RPD             | % Recovery |
| 05/18    | 1620 | NTR | Cyanide Total (as CN) | < 0.0100 mg/L |       |          | SM 1999 4500-CN E | 1.26              | 96.3 *     |
| 05/16    | 1600 | CT  | pH                    | 6.3 S.U.      |       |          | SM 2000 4500-H+B  |                   |            |
| 05/18    | 1718 | RAH | Chromium              | 3.00 ug/L     |       |          | EPA 200.8         | 5.32              | 101.6 *    |
| 05/18    | 1718 | RAH | Nickel                | 2.00 ug/L     |       |          | EPA 200.8         | 8.03              | 102.2 *    |
| 05/17    | 1718 | RAH | Copper                | 5.00 ug/L     |       |          | EPA 200.8         | 7.34              | 101.0 *    |
| 05/18    | 1718 | RAH | Zinc                  | 28.00 ug/L    |       |          | EPA 200.8         | 8.53              | 112.1 *    |
| 05/18    | 1718 | RAH | Silver                | < 0.5 ug/L    |       |          | EPA 200.8         | 8.20              | 109.8 *    |
| 05/18    | 1718 | RAH | Cadmium               | 0.70 ug/L     |       |          | EPA 200.8         | 4.43              | 105.0 *    |
| 05/18    | 1718 | RAH | Lead                  | < 0.50 ug/L   |       |          | EPA 200.8         | 1.83              | 111.2 *    |

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

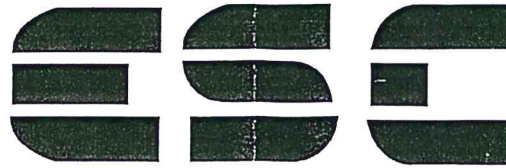
All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of 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)<br>Metals (See Comments)                               |        |       |  |  |  |  |
| Address: #5 Hwy 82 West<br>Magnolia, AR 71753   |               |                   |         | Purchase Order #:                                 |        |                   |            |                |         |   |        |       |  |  |  |  |
| Telephone: 800-221-0408   |               |                   |         | Work Order #:                                     |        |                   |            |                |         |   |        |       |  |  |  |  |
| Fax: 870-234-4665   |               |                   |         | Sampler Name(s): <i>Toby Davis</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   | #       |   |        |       |  |  |  |  |
|   | 1705010579    | 5-16-17           | 4:00 pm | Grab  | Water  | Plastic           | 1 Liter    | NaOH+Ascorbic  | 1       | X   |        |       |  |  |  |  |
|   |               | 5-16-17           | 4:00 pm | 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>Colleen Tuggle</i>   |               | 5-16-17           | 4:15 pm | <i>Colleen Tuggle</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>Toby Davis</i>   |               | 5-16-17           | 4:15 pm | <i>Toby Davis</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>And Court Case Callout</i>                     |        |                   |            | 5/17/17        | 1010    | 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: 6.3    |                |         |   |        |       |  |  |  |  |
|   |               |                   |         |   |        | Time:             | 4:00 pm    |                |         |   |        |       |  |  |  |  |
|   |               |                   |         |   |        | Reading:          |            |                |         |   |        |       |  |  |  |  |
|   |               |                   |         |   |        | Units:            |            |                |         |   |        |       |  |  |  |  |
| * Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.                 |               |                   |         |   |        | Fecal Start:      |            |                |         | This Document is Page ___ of ___                                  |        |       |  |  |  |  |

Directions