Wilson, Tabatha

From: Gilliam, Allen

Sent: Wednesday, July 02, 2014 3:08 PM

To: Colleen Tuggle (ctuggle@southernaluminum.com); Leon Ryan

(Iryan@southernaluminum.com)

Cc: Fuller, Kim; Wilson, Tabatha; magnolia russell thomas

Subject: AR0043613_Southern Aluminums ARP001059 June 2014 semi annual Pretreatment

report with ADEQ reply_20140701

Attachments: Southern Aluminums June 2014 Semi annual Report.pdf

Leon and/or Colleen,

Southern Aluminum's June 2014 semi-annual Pretreatment report (attached) was received on 7/1/14, reviewed, deemed complete and compliant with the Pretreatment reporting requirements in 40 CFR 403.12(e) and more specifically compliant with the Metal Finishing standards in 40 CFR 433.17. There is no further action necessary at this time.

Thank you for the report remaining compliant with the Federal Pretreatment Requirements in 40 CFR 403.

Sincerely,

Allen Gilliam ADEQ State Pretreatment Coordinator 501.682.0625

Ec: Russell Thomas, Magnolia Wastewater Manager Bernie Finch, Finch Environmental – Consultant to Southern Aluminum

E/NPDES/NPDES/Pretreatment/Reports

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

6/30/2014

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

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;

Analytical results of the sample taken on 06/12/2014 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 6.8 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.

Letter to Allen Gilliam, ADEQ Southern Aluminum Company Page 2 of 2 6/25/2014

Thank you.

Sincerely,

Bsk.Fs

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	
A. LEGAL NAME & MAILING ADDRESS	B. FACILITY & LOCATION ADDRESS
Southern Aluminum P.O. Box 884	Southern Aluminum 5 Highway 82 West
Magnolia, AR 71754	Magnolia, AR 71753
C. FACILITY CONTACT: Colleen Tuggle TELEPHONE NUM	ABER: 870.234.8660 e-mail: tuggle@southernaluminum.com
C. FACIEIT CONTACT. Concentraggic	TBER. 670.234.5000 C-man. tuggie@southernaidimmum.com
(2) REPORTING PERIOD-FISCAL YEAR 2013 (Both Semi-An	nual Reports must cover Fiscal Year)
A. MONTHS WHICH REPORTS ARE DUE	B. PERIODS COVERED BY THIS REPORT
July and January for each semi-annual reporting period.	FROM: January 1, 2014 TO: June 30, 2014
(3) DESCRIPTION OF OPERATION	
A. REGULATED PROCESSES	B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF
CORE PROCESS(ES)	THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.
CHECK EACH APPLICABLE BLOCK	
G Electroplating	None.
G Electroless Plating G Anodizing	
O Coating G Chemical Etching and Milling	
G Printed Circuit Board Manufacture	
ANCILLARY PROCESS(ES)*	
LIST BELOW EACH PROCESS USED IN THE FACILITY	
Coating_	
Cleaning	
- <u></u>	
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

^{**8&}quot;Unregulated" has a precise legal meaning; see 40CFR403.6(e).

(5) MEASUREMENT OF POLLUTANTS

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSESCORE & 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	0.0037	0.0024	0.012	0.0017	0.0053	0.003	0.565	0.01	N/A
Ave Measured	0.0037	0.0024	0.012	0.0017	0.0053	0.003	0.565	0.01	

Sample Location Flow-weighted composite samples taken of wash tank and rinse tank contributions commingle
prior to discharge to municipal collection system. Dip tank did not discharge during the period 01-01-2014
through 06-30-2014.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency One (1) sample collected 06-12-2014

40 CFR 136 Preservation and Analytical Methods Use: O Yes G No

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

(6) CERTIFICATION

A. Required under 40 CFR 403.12(g)

^{**}Indicate if these Streams commingle with Regulated Streams BEFORE treatment

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 (Typed Name) Vice President/General Manager (Corporate Officer or authorized representative)							
B. CHECK ONE: O '433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED G '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.							
Typed Name)							
Vice President, General Manager (Corporate Officer or authorized representative) Date of Signature 6 2614							
Intentionally left blank							

40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: Southern Aluminum ARP001059

'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.	
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 01-01-2014 and ending 06-30-2014

(9) SIGNATORY REQUIREMENTS [40CFR403.12(1)]

40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: Southern Aluminum ARP001059

I certify under penalty of law that I have personally examined and and all attachments were prepared under my direction or supervisithat qualified personnel properly gather and evaluate the information persons who manage the system, or those persons directly responsible submitted is, to the best of my knowledge and belief, true, accurate,	on in accordance with a system designed to assion submitted. Based on my inquiry of the persole for gathering the information, the information and complete. I am aware that there are significant.
penalties for submitting false information, including the possibility	of fine and imprisonment for knowing violation
Leon M. Rvan	Leon PHINO
	SIGNATURE
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE	
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE Vice President/General Manager	6 -26-14

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: 1406010450

Customer Name : SOUTHERN ALUMINUM CO., INC.

Customer Number: 2754
Report Date: 06/24/14

Sample Date : 06/12/14

Sample Time : 1350 Sample Type : GRAB WATER

Sample From :

Collected By: JF/CT

Delivery By : UPS Work Order :

Purchase Order :

Analysis Analysis					Quality Assurance		
Analysis			433.17	トシャン		Precision	Accuracy
Date Time By	<u>Parameter</u>	Result	Notes	Ouantity	<u> Method</u>	% RPD	% Recovery
06/17 1400 NTR	Cyanide Total (as CN)	< 0.0100 mg/L	0-65		SM 1999 4500-CN E	2.55	93.0 *
06/20 1155 RAH	Chromium	2.40 ug/L	- 70		EPA 200.8	0.54	101.3 *
06/20 1155 RAH	Nickel	5.30 ug/L	2380		EPA 200.8	1.48	103.9 *
06/20 1155 RAH	Copper	12.00 ug/L	2070		EPA 200.8	0.60	102.0 *
06/20 1155 RAH	Zinc .	565.00 ug/L	14-80		EPA 200.8	1.06	97.0 *
06/20 1155 RAH	Silver	3.00 ug/L	240		EPA 200.8	2.50	104.8 *
06/20 1155 RAH	Cadmium	3.70 ug/L	1:70		EPA 200.8	0.32	107.4 *
06/20 1155 RAH	Lead	1.70 ug/L	430		EPA 200.8	3.93	99.6 *

DA: 4.8 50

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

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

Inmental Services Company, Inc. Corporate Office

13715 West Markham

P.O. Box 55146 Little Rock, AR 72215

Little Rock, AR 72211 website: www.esclabs.com

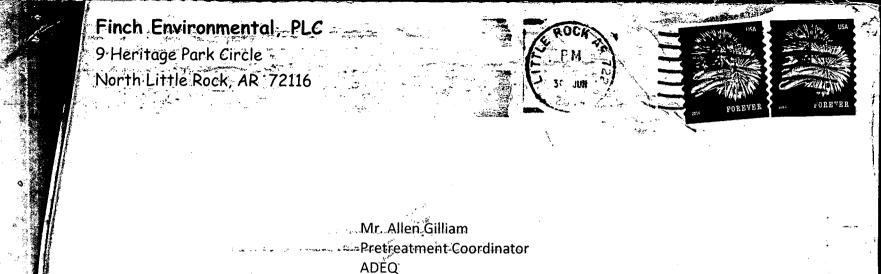


Environmental Services Cor iv. Inc. Northwest Branch 1107 Century Springdale, AR 72764

CHAIN OF CUSTODY

Phone 479-750-1170 Fax:: 479-750-1172 Phone: 501-221-2565 Fax: 501-221-1341 **Project Information** Requested Parameters Client Information Permit/Project #: Company Name: Southern Aluminum Co., Inc. #5 Hwy 82 West Purchase Order #: Address: Magnolia, AR 71753 Work Order # 800-221-0408 Sampler Name(s): Telephone: Metals (See Comments) Fax: 870-234-4665 and Signature(s): Contact: Ms. Colleen Tuggle ESC Client Number: 2754 Cyanide(9) Sample Identification Sample Collection Sample Containers ESC Control# Time Type Matrix Volume Preservative # Identification Date Type 1406010450 1.50 pm Grab X Water Plastic 1 Liter NaOH+Ascorbic X ► Grab Plastic HNO3 to pH <2* Water 8 oz Custody Seals: Received By: (Signature and Printed Name) 2'.00da JEFF FARRAR Used? Intact? urnaround Time 1000 Regular Special Were samples properly preserved: 10.75 Yes Flow Data Field Test Analyst Result Units Cd(48.PS), Cr(24.PS), Cu(29.PS), Pb(82.PS), Ni(28.PS), Ag(47.PS), pH: 60. 8 Comments: Analyst: Time: Zn(30.PS) Reading: Units: Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory. This Document is Page Fecal Start:





5301 Northshore Drive North Little Rock, AR 72118