

Gage, Hannah

From: Gilliam, Allen
Sent: Friday, September 02, 2016 12:58 PM
To: aaron exley
Cc: Gage, Hannah; Leamons, Bryan; Yates, Adam; fayetteville denise georgiou
Subject: AR0036692_Nidec ARP000026 August 2016 notice of pH violation_20160902
Attachments: doc00684620160902123025.pdf

Aaron,

Nidec's August 5th, 2016 pH excursion notice (attached) to the City of Mena (Mike Spencer) was received by this office on 8/19/16.

Thank you for the notification, corrective action and further training of Nidec's Environmental Operator to conform with the 24 hour notification requirement in 40 CFR 403.12(g)(2).

One might consider requesting the City to modify its Ordinance pH upper limit to 10/10.5 or 11 s.u. if Mr. Spencer indicated he "often has to raise the pH of the affluent (sic)". [influent, perhaps?] Most Pretreatment cities in the State (including Fayetteville) have upper pH limits in the range of 10.5 s.u. (and above) as additional alkalinity does aid treating sanitary sewage.

Again thank you for the notification and corrective actions.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Denise Georgiou, CH2M consultant engineer for Mena

E/NPDES/NPDES/Pretreatment/Reports

C471J



Aaron Exley
Environmental, Health &
Safety Manager

August 17, 2016

Mike Spencer
Mena Water and Sewer Department
701 Mena Street
Mena, Arkansas 71953

Dear Mr. Spencer,

On 8/5/2016 Nidec Motor Corporation (MENA02) had a bypass event having to do with the Waste Water Treatment System. The part of the system bypassed was to balance the pH level to 6-9 after the pretreatment process before it is pumped to the sewer. The water being transferred to our tank for this operation left through the sewer connection point in building 2 due to the valve being left open to the sewer while making the transfer. Typically the valve would be closed; the water would enter the tank as required and circulate for balancing of the pH of the batch. The amount transferred was 960 gallons at a pH level between 9-10.3; human error was the cause for the bypass.

You and I discussed the event on 8/15/2016. You indicated to me that the impact on the WWTP would be minimal and that you often have to raise the pH of the affluent at the treatment plant. I also explained that I had just learned of the bypass which occurred while I was on vacation.

The condition was corrected on 8/5/2016 by Nidec's Environmental Operator who is responsible for following the Pretreatment Water Processing Procedure. No additional batches will bypass the process.

As a corrective action we trained our Environmental Operator so he is aware of the 24 hour window to report a bypass event. We updated our Waste Water Treatment Worksheet that is filled out each time we do a batch to include a note about reporting bypass issues to the WWTP and to remind the employee to close the valve to the sewer prior to transferring the waste water to tank 3 for pH balancing.

Managers that provide back up for the EHS manager will be given information about the requirement to report bypass and other events. They will be given instructions to contact me or the Corporate Director of EHS for Nidec Motor Corporation to get instructions on how to report an event.

Sincerely,

Aaron Exley
Environmental, Health & Safety Manager

CC:
Randy Wiseman
Charles Pitman
Allen Gilliam
Mark Kinder



NIDEC MOTOR CORPORATION

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