

**Exley, Aaron [NMCA/MEN]**

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**From:** Gilliam, Allen [GILLIAM@adeq.state.ar.us]  
**Sent:** Thursday, October 28, 2010 11:14 AM  
**To:** Exley, Aaron [NMCA/MEN]; Becker, Mark [NMCA/IND]  
**Cc:** 'mary timmons'; 'fayetteville denise georgiou'  
**Subject:** RE: AR0036692\_Nidec (ARP000026) Oct 2010 Semi-Annual Pretreatment Report Response (corrected)\_20101029

Sorry, left out "complete" in the first sentence.

Allen Gilliam

-----Original Message-----

**From:** Gilliam, Allen  
**Sent:** Wednesday, October 27, 2010 10:15 AM  
**To:** 'Aaron.Exley@emerson.com'  
**Cc:** mary timmons; fayetteville denise georgiou  
**Subject:** AR0036692 Nidec (ARP000026) Oct 2010 Semi-Annual Pretreatment Report Response (corrected)\_20101029

Aaron,

Your October semi-annual report was received and reviewed. The report will be deemed complete, but compliance "unverifiable" with a comment for your follow-up action.

Upon reviewing the sample's chain of custody and the analytical report from your contract lab, "ESC", who fills out the chain of custody? ESC? The chain requests results from "TCLP" (toxicity characteristic leaching procedure) metals and is incorrect.

The TCLP is a 40 CFR 261.24 hazardous waste test method (#1311) which includes a step for the leaching procedure. This is not per the required 40 CFR 136 approved methods for total ("T") metals.

Please correct the directions given the lab to conduct only the approved methods in 40 CFR 136. Two methods were indicated on their final results, all but CN being 1311/200.7. It's confusing because method 200.7 is an approved 40 CFR 136 method.

Bottom line, wastewater discharged to the city's sewer system has nothing to do with the haz waste regulations and ONLY T.Metals as measured by approved methods under 40 CFR 136 should be reported. It would be advisable to retest and submit as a correction to this report.

Apologies for not noting this on previous reports. Please call if you have any questions.

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

**Aaron Exley**

Nidec Motor Corporation  
Mena Plant  
500 North Morrow Street  
Mena, AR 71953

T (479) 394-8741  
F (479) 394-8876  
Aaron.exley@nidec-motor.com

December 3, 2010

Mr. Allen Gilliam  
NPDES Pretreatment Engineer  
Water Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

RE: April 8, 2010, Pretreatment Report for Nidec Motor Corporation, Mena Plant  
Permit Number ARP000026 AFIN Number 57-00001

Dear Mr. Gilliam,

We are submitting a correction to the October Report based on your letter received October 27, 2010. As requested a new sample was taken and sent in using the approved 40 CFR 136 method. This communication should complete our follow up action and change our report from unverifiable to verifiable.

Please call me at (479) 394-8741 if you have any questions regarding the attached report.

Cordially,



Aaron Exley

cc:

Mike Spencer, Mena Waste Water Treatment Plant, 323 Polk County Road 53  
Randy Wiseman, Director of EHS, Nidec Motor Corporation

# 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

**LEGAL NAME & MAILING ADDRESS**

Nidec Motor Corporation  
500 North Morrow Street  
Mena, AR 71953

**B. FACILITY & LOCATION ADDRESS**

Nidec Motor Corporation  
500 North Morrow Street  
Mena, AR 71953

C. FACILITY CONTACT: Aaron Exley EH&S Manager

TELEPHONE NUMBER: (479) 394-8741

## (2) REPORTING PERIOD--FISCAL YEAR From Oct 1 to Sep 30 (Both Semi-Annual Reports must cover Fiscal Year)

**A. MONTHS WHICH REPORTS ARE DUE**

October & April

**B. PERIOD COVERED BY THIS REPORT**

FROM May 2010 TO: Oct 2010

## (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

Parts Washing \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

**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.

C. Number of Regular Employees at this Facility 340

D. [Reserved]

**(4) FLOW MEASUREMENT**

INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge
Regulated (Core & Anc)	44.8	1300	Batch
Regulated (Cyanide)	-	-	-
§403.6(e) Unregulated*	-	-	-
§403.6(e) Dilute Cooling Water	-	-	-
Sanitary	239	451	Continuous
Total Flow to POTW	7600	7600	Continuous
	11046	11,319	xxxxxxxx

\*"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

**(5) MEASUREMENT OF POLLUTANTS**

A. TYPE OF TREATMENT SYSTEM

CHECK EACH APPLICABLE BLOCK

- Neutralization
- Chemical Precipitation and Sedimentation
- Chromium Reduction
- Cyanide Destruction
- Other \_\_\_\_\_
- None

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	0.69	2.77	3.38	0.69	3.98	0.43	2.61	1.20	2.13
Monthly Ave	0.26	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured	< 0.004	0.018	0.188	< 0.010	0.279	<0.01	1.20	<0.0448	--
Ave Measured	< 0.004	0.018	0.188	< 0.010	0.279	<0.01	1.20	<0.0448	--

Sample Location Discharge from Wastewater System

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency Collected 1 every 6 months

40CFR136 Preservation and Analytical Methods Use:  Yes  No

**(6) CERTIFICATION**

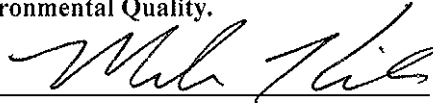
**A. CYANIDE CERTIFICATION (Applicability Pending)**

[Reserved]

B. CHECK ONE:  §433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED  §433.12(a) TTO CERTIFICATION PROVIDED BELOW

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.

Mark Kinder, Plant Manager  
(Typed Name)



(Corporate Officer or authorized representative)

Date of Signature 12/3/2010

**CORPORATE ACKNOWLEDGEMENT (Optional)**

STATE OF ARKANSAS )  
COUNTY OF \_\_\_\_\_ )

Before me, the undersigned authority, on this day personally appeared \_\_\_\_\_ of \_\_\_\_\_, a corporation, known to me to be the person whose name is subscribed to the foregoing instrument(s), and acknowledged to me that he executed the same for purposes and considerations therein expressed, in the capacity therein stated and as the act and deed of said corporation.

Given under my hand and seal of office on this \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_.

\_\_\_\_\_  
Notary Public in and for \_\_\_\_\_  
County, Arkansas

My commission expires \_\_\_\_\_.

**(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:

- ◆ Continued maintenance of RPZ valves.
- ◆ Chemical precipitation of regulated streams prior to discharge.
- ◆ Floor drains in manufacturing areas sealed.

**(8) GENERAL COMMENTS**

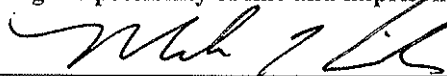
N/A

**(9) SIGNATORY REQUIREMENTS [40CFR403.12(I)]**

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.

**Mark Kinder**

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE



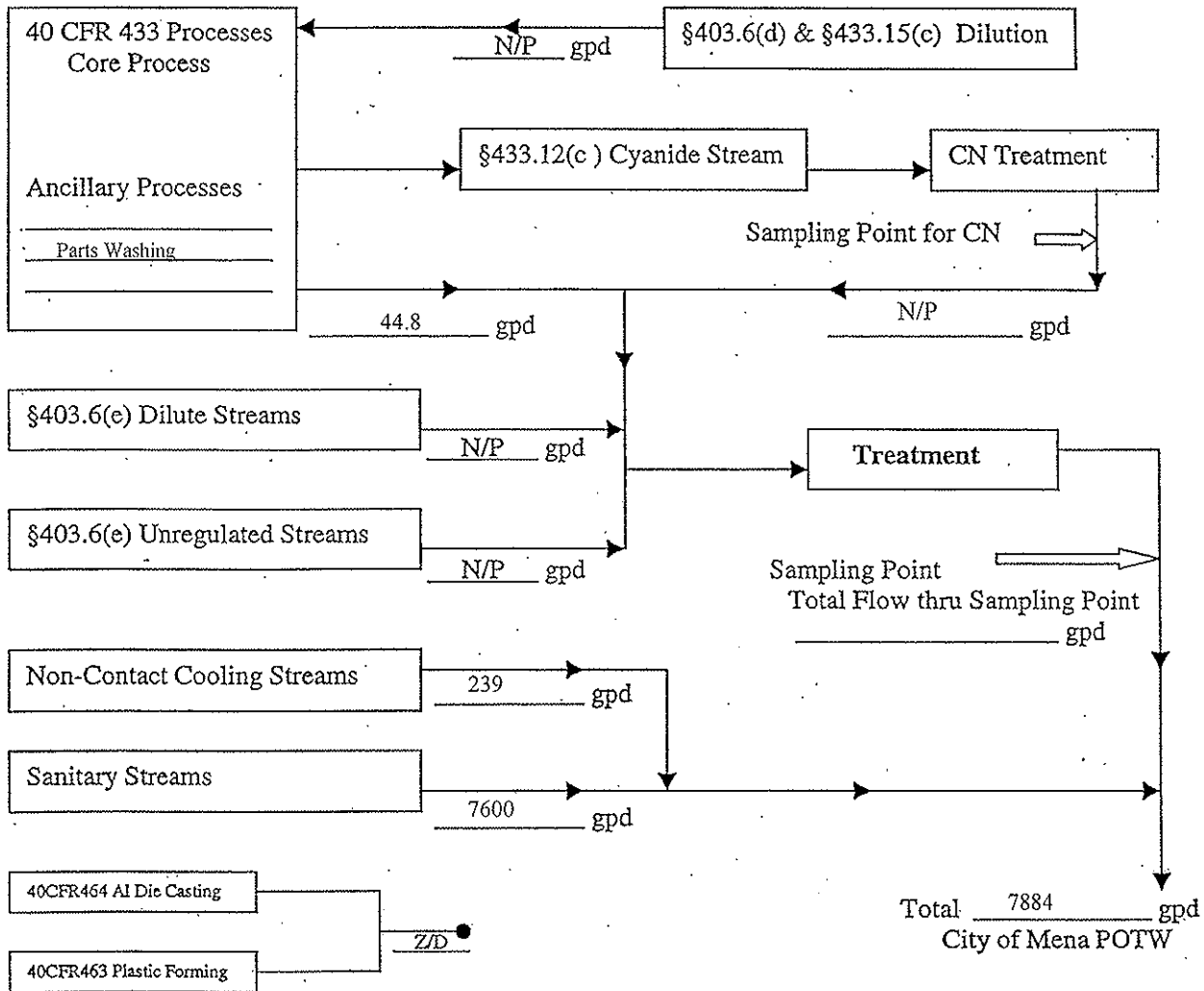
SIGNATURE

**Plant Manager**

OFFICIAL TITLE

DATE SIGNED





If a stream is not present, show NOT PRESENT or N/P. If a stream is present, the wastewater can enter the POTW but currently has no flow, show 0.0 gpd. If a stream is present but the wastewater cannot enter the POTW, show Zero Discharge or Z/D. If an unregulated stream is present but the User has decided not to declare it at this time, show N/P.

*Aaron Exley*  
 Signature of §403.12(b) Professional

*10/19/2010*  
 Date

I certify under penalty of law that I have personally examined and am familiar with the information in this document and that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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.

*Mike Hill*  
 Plant Manager or the authorized §403.12(i) official

*10/19/10*  
 Date  
 UEM\_Diagram.doc (08-06-2002)



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](http://www.esclabs.com)



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

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

Phone 479-750-1170 Fax: 479-750-1172

CHAIN OF CUSTODY

Client Information				Project Information				Requested Parameters			
Company Name: Nidec Motor Corporation				Permit/Project #:							
Address: 500 Morrow Street Mena, AR 71953-2599				Purchase Order #:							
Telephone: 479-394-8761				Work Order #:							
Contact: Mr. Aaron Exley				Sampler Name(s): Terry Davis							
FAX: 479-394-8805				and Signature(s): <i>Terry Davis</i>							
ESC Client Number: 478											

Sample Identification	ESC Control #	Date	Time	Type	Matrix	Type	Sample Containers			Used?	Intact?
							Volume	Preservative	#		
Wastewater	1011010213	11/11/10	8:00 AM	Grab	Water	Plastic	1 Liter	HNO3	1	X	
Requisitioned By: (Signature and Printed Name) <i>Terry Davis</i> Date: 11/11/10 Time: 8:00 AM Received By: (Signature and Printed Name) <i>Vicki Reed</i> Date: 11/11/10 Time: 1:00 PM											
Requisitioned By: (Signature and Printed Name) <i>Terry Davis</i> Date: 11/11/10 Time: 1:30 PM Received By: (Signature and Printed Name) <i>Nell Rasmussen</i> Date: 11/11/10 Time: 1:30 PM											
Cool all samples to $\leq$ 6 degrees C with ice.											
Comments: Metals: Cd(48.IW), Cr(24.IW), Cu(29.IW), Pb(82.IW), Ni(28.IW), Ag(47.IW), Zn(30.IW)				Flow Data		Field Test					
Cooling for Metals analyses not required.				Analyt:		Reading:					
				Units:		Chlorinated?					
				Units:		Fecal Start:					
This Document is Page 1											

Directions

*(Handwritten signature)*

# 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: 1011010313  
 Customer Name : NIDEC MOTOR CORPORATION  
 Customer Number : 478  
 Report Date : 11/23/10

Sample Date : 11/11/10  
 Sample Time : 0800  
 Sample Type : GRAB WATER  
 Sample From : WASTEWATER

Collected By: TERRY DAVIS  
 Delivery By : FEDEX  
 Work Order :  
 Purchase Order :

### Laboratory Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Assurance % Recovery
11/19	1611	BGW	Chromium	0.01800			EPA 200.7	0.42	95.6 *
11/19	1611	BGW	Nickel	0.2790			EPA 200.7	0.43	94.1 *
11/19	1611	BGW	Copper	0.1880			EPA 200.7	0.20	98.5 *
11/19	1611	BGW	Zinc	1.2000			EPA 200.7	1.95	94.7 *
11/22	1417	BGW	Silver	< 0.0010			EPA 200.7	0.21	95.2 *
11/19	1611	BGW	Cadmium	< 0.0040			EPA 200.7	0.22	91.9 *
11/19	1611	BGW	Lead	0.0190			EPA 200.7	0.99	99.7 *

\* 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.