

Gilliam, Allen

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_20101029

Aaron,

Your October semi-annual report was received and reviewed. The report will be deemed, 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
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