

Gilliam, Allen

From: Gilliam, Allen
Sent: Monday, October 24, 2011 8:06 AM
To: Aaron.Exley@nidec-motor.com
Cc: mary timmons; Mena Mike Spencer (menawwtp@gmail.com); 'Denise.Georgiou@CH2M.com'; 'mcannon@live.com'
Subject: AR0036692_Nidec's (ARP000026) Oct. 2011 Semi Annual Pretreatment Report with additional sampling response_20111020

Aaron,

Your October 2011 semi-annual Pretreatment Report was electronically received on 10/18/11, reviewed and deemed complete and compliant with the National Pretreatment Requirements in 40 CFR 403; more specifically the Pretreatment Standards in 40 CFR 433.15 – the Metal Finishing limitations. See “[Note]” below.

Thank you for submitting additional information regarding Pollution Prevention activities, upgrading your filtration system and the additional Zinc analyticals.

[Note: From the spreadsheet supplied, samples for Zinc taken on 6/3 (two - were these split samples?) and 6/8 (your spreadsheet incorrectly[?] indicates “6-Jan”) averaged 0.896 mg/l for June which is compliant with the “monthly average not to exceed” per 40 CFR 433.15.

Luckily you chose June to take multiple daily samples for a monthly average. I’ve corrected/initialed the third sheet of your semi-annual report to reflect this for June (your highest monthly average) as the other 4 months’ samples taken were well below June’s “monthly average”.

If just one sample is taken per month it has to meet the “monthly average not to exceed”. In other words, the 10 regulated wastewater samples you took beginning in May, ending in September cannot be used for a monthly average of “0.4436” as your cover letter suggests.]

A word of caution regarding Chain of Custody (C of C) forms: Not all C of C forms submitted indicated who the sample(s) were received by. It appears Edd Myers conducted the sampling and relinquished the samples, but the chain of custody forms from Data Testing did not indicate who the samples were received by. Environmental Services Co.’s C of C is also incomplete for the one with a sampling date of 6/8/11.

You might consider contacting your contract labs to ensure these chain of custody forms are complete from sampler to the contract lab recipient. Per 40 CFR 403.8(f)(2)(vii), “...Sample taking and analysis and the collection of other information shall be performed with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions...”

Analytical results from “broken” chains of custody would more than likely not be admissible in a court of law.

If you have any questions or comments, please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Mary Timmons, City of Mena – General Manager / Mike Spencer, City of Mena – W.W. Plant Supervisor / Denise Georgiou – CH2M Consultant Engineer

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From: Exley, Aaron [NMCA-MEN] [<mailto:aaron.exley@nidec-motor.com>]

Sent: Tuesday, October 18, 2011 3:54 PM

To: Gilliam, Allen; Mary Timmons; Mike Spencer; mcannon@live.com

Subject: DMR Report Nidec - Mena - Oct

Here is a Zipped File that might get through the Firewalls better.

Here is our October DMR report. A couple things to note are I have included a spread sheet of the lab test taken. I have a before sample before treatment on the list. I wanted a sample of this so I could compare how much Zinc we were removing.

I have a hard copy on the way to Allen Gilliam and Mary Timmons registered mail.

Aaron Exley
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