

Gilliam, Allen

From: Gilliam, Allen
Sent: Monday, May 09, 2011 3:21 PM
To: Aaron.Exley@nidec-motor.com; 'mark.becker@nidec-motor.com'
Cc: Fuller, Kim; Shafii, Mo; Garner, Cindy; mary timmons; mena mike spencer; Denise.Georgiou@CH2M.com
Subject: AR0036692_Nidec's (ARP00026) April 2011 Semi-Annual Pretreatment Report Review_20110505

Aaron,

Your April 2011 semi-annual report was received on 5/2/11, reviewed and deemed complete. However, your regulated wastewater analyticals indicated your facility is in Significant non-compliance (SNC) with the federal Metal Finishing Standards in 40 CFR 433.15 specifically for the Zn "Monthly Average Shall Not Exceed" standard`.

The Metal Finishing standards for Zinc under 40 CFR 433.15 are: "Max. for any 1 day" = 2.61 mg/l and the "Monthly Avg Shall not Exceed" = 1.48 mg/l.

- 1) Your semi-annual report indicated 7.28 mg/l (sample date – 3/4/11) and 5.07 mg/l (sample date – 3/29/11). Both results exceeded the "Max. for any 1 day" standard and the average of the two (2) samples = 6.18 mg/l violates the "Monthly Avg Shall not Exceed" standard.
- 2) Further analyticals reported 3.04 mg/l and 1.96 mg/l (sample date – 4/7/11). The first sample exceeds the "Max. for any 1 day" standard and the average of those two samples during that calendar month = 2.5 mg/l violates the "Monthly Avg Shall not Exceed" standard as your 4/29/11 correspondence, first page, correctly identifies.
- 3) Analyticals from your last semi-annual report showed Zn levels at 1.2 mg/l (sample date 11/11/10) = no violations.

Compilation of the last six (6) months of sampling:

- a) "Max. for any 1 day" standard for Zn violated three (3) times out of the five (5) sampled, or 60% of all measurements;
- b) "Monthly Avg Shall not Exceed" standard for Zn violated two (2) times out of the three (3) months sampling took place, or 66% of all measurements.

Under 40 CFR 403.8(f)(2)(viii), "...[Nidec] is in significant noncompliance (SNC) if its violation meets one or more of the following criteria: (A) Chronic violations of wastewater Discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement;..."

Measurements in b) meet the criteria for SNC.

Under 40 CFR 403.8(f)(2)(viii), "...[Nidec] is in significant noncompliance (SNC) if its violation meets one or more of the following criteria: (B) Technical Review Criteria (TRC) violations, defined here as those in which 33 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, as defined by 40 CFR 403.3(l) multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH);..."

"Max. for any 1 day" TRC for Zn = $1.2 \times 2.61 = 3.13$ mg/l. Three (3) of the five (5) above samples, or 60%, exceeded this "TRC" violation.

Measurements in a) meet the criteria for SNC.

It's understood Nidec is searching for corrective actions through a contract with HarChem. Please keep this office apprised of this schedule.

Nidec must begin submitting Zn analyticals to ADEQ and the City once every month until the Zn problem is identified and corrected with the first Zn analytical report due 5/27/11. Please keep in mind, it would be prudent to conduct sampling more frequently to potentially reduce your Zn monthly average below the Metal Finishing "Monthly Average" standard.

If there are further questions or updates, feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625