

AFOS3 AG



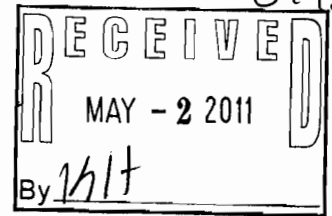
Aaron Exley
Environmental, Health &
Safety Manager

April 29, 2011

Allen Gilliam
ADEQ State Pretreatment Coordinator
5301 Northshore Drive
North Little Rock, AR 72118-5317

Mary Timmons
General Manager
Mena Wastewater Utilities
701 Mena Street
Mena, AR 71953

April 2011 Pretreatment Report for Nidec Motor Corporation, Mena Plant
Permit Number ARP000026 AFIN Number 57-00001



Zn violations
502
AF

Dear Mr. Gilliam and Ms. Timmons,

This is our semi-annual report for our Waste Water Pretreatment, as required by our Basis for Monitoring document and 40 CFR Part 403. As indicated in our enclosed Semi-Annual Report for Industrial Users Regulated by 40 CFR 433, Nidec Motor Corporation exceeded the daily maximum and monthly average limit for zinc. This exceedance was the subject of my April 12, 2011 correspondence to you, a copy of which is attached.

Nidec sampled two batch discharges on April 7, 2011. The sampling results, which are enclosed, were 3.04 mg/L and 1.96 mg/L. One sample exceeds the daily maximum limit and the average of the samples exceeds the monthly average limit.

As stated in our previous correspondence, Nidec has been working with its pretreatment system designer and chemical supplier, HarChem Water Services, to try to identify the cause of and resolve the zinc issue. HarChem visited our site on April 12th to examine our processes and conduct several bench tests. HarChem has continued to conduct bench tests and is making changes to our treatment processes to improve the precipitation of zinc from our wastewater. These changes include increasing and maintaining the pH of the wastewater during the treatment process and using newer polymers for coagulation and flocculation. Nidec has entered into a service contract with HarChem to obtain additional support with the operation of our treatment system. We will resample our wastewater and provide you with those results.

As discussed Nidec believes all corporations have a responsibility for the environment and we are committed to environmental excellence. I have appreciated your input and assistance while we

NIDEC MOTOR CORPORATION

IM&S DIVISION, US MOTORS, 500 N. MORROW STREET, MENA, AR 71953
PHONE: (479)-394-8741 FAX: (479) 394-8888 EMAIL: aaron.exley@nidec-motor.com



Aaron Exley
Environmental, Health &
Safety Manager

take the corrective steps necessary to resolve the zinc issue.

I also want to bring to your attention that I have enclosed an updated TOMP that reflects our facility's name change to Nidec Motor Corporation.

If you have any question about the content of this report please contact me at 479-394-8741.

Sincerely,

Aaron Exley

Attachments:

Semi-Annual Report for Industrial users Regulated by 40CFR433

Flow Chart of flows going to the POTW

Analysis of our Waste Water and Chain of Custody Documents completed for this report in March (two samples taken)

Analysis of two additional Zinc samples that were used to test additional batches taken in April (will be a part of the October 2011 DMR report)

April 12, 2011 letter from A. Exley, Nidec to A. Gilliam, ADEQ and M. Timmons, Mena Wastewater Utilities

TOMP

CC: ADEQ Water Division, NPDES Enforcement [Reference: Central Files (AR0036692)]
Mike Spencer – Mena POTW
Matt Cannon – Mena POTW
Randy Wiseman - Nidec

NIDEC MOTOR CORPORATION

IM&S DIVISION, US MOTORS, 500 N. MORROW STREET, MENA, AR 71953
PHONE: (479)-394-8741 FAX: (479) 394-8888 EMAIL: aaron.exley@nidec-motor.com

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 Oct 2010 **TO:** Mar 2011

(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 352

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)	141.5	1300	Batch
Regulated (Cyanide)	-	-	-
§403.6(e) Unregulated*	-	-	-
§403.6(e) Dilute Cooling Water	-	-	-
Sanitary	95.6	451	Continuous
Total Flow to POTW	7600	7600	Continuous
	10595	10640	XXXXXXXXXX

*"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

Our Precipitation system failed to remove Zinc in the test taken for this DMR report for this period. Actions are attached.

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	0.0130	0.062	0.599	0.0110	0.353	0.001	7.28	<0.01	--
Ave Measured	0.0085	0.0595	0.43	0.0105	0.2465	0.001	6.17	<0.01	--

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

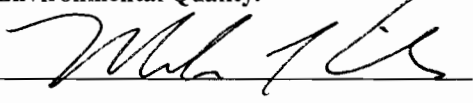
(6) CERTIFICATION

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 4-20-11

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.
- ◆ Containment area in Environmental Area
- ◆ Weekly Inspection of facility for environmental issues by environmental operator

(8) GENERAL COMMENTS

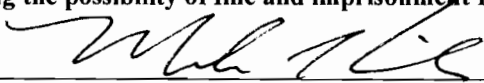
N/A

(9) SIGNATORY REQUIREMENTS [40CFR403.12(l)]

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



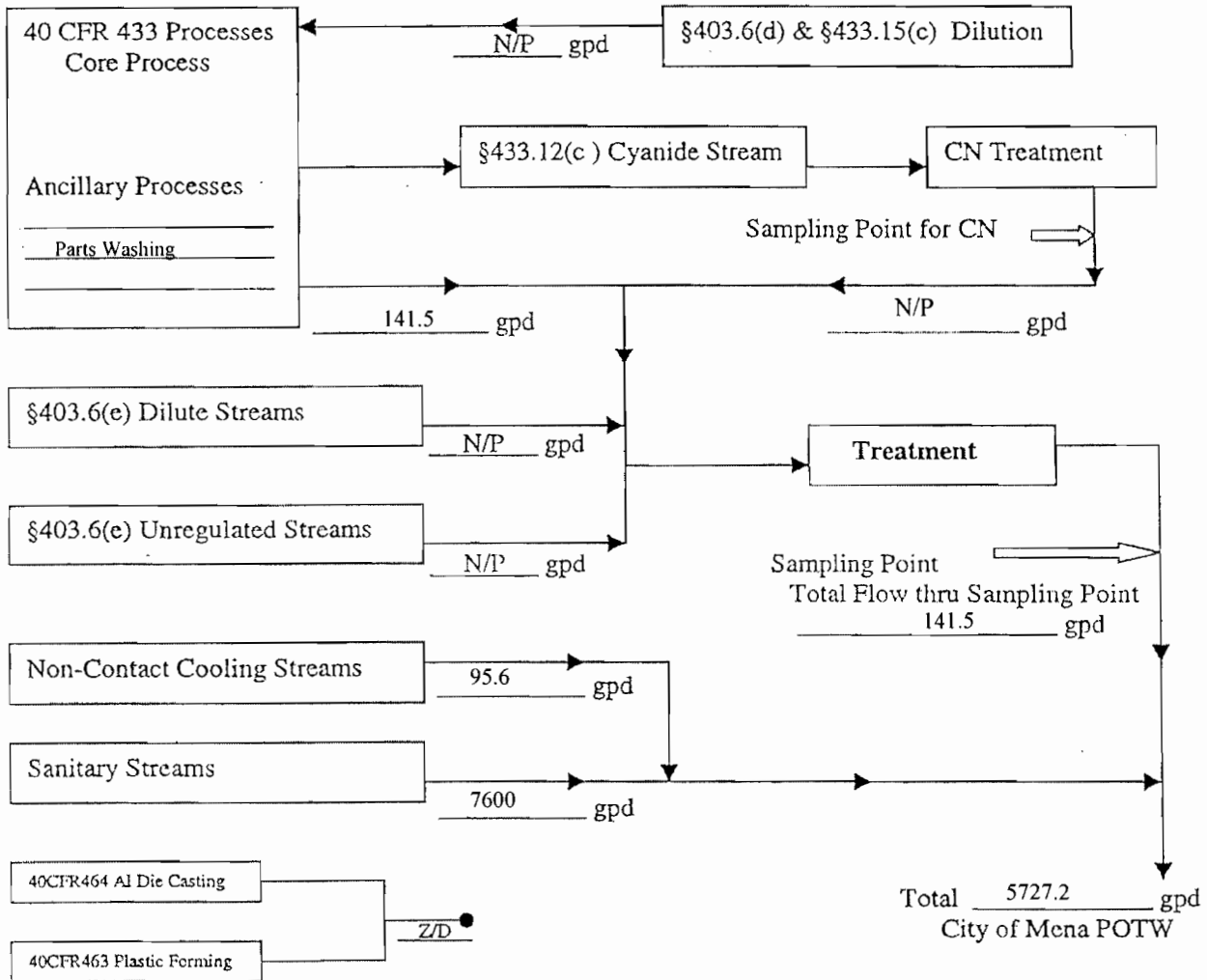
SIGNATURE

Plant Manager

OFFICIAL TITLE

4-20-11

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

4/20/2011
 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.

Will He
 Plant Manager or the authorized §403.12(l) official

4-20-11
 Date

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: 1103010312
 Customer Name: NIDEC MOTOR CORPORATION
 Customer Number: 478
 Report Date: 03/18/11

Sample Date: 03/04/11
 Sample Time: 1045
 Sample Type: GRAB WATER
 Sample From: WASTEWATER

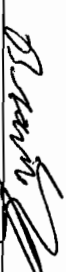
Collected By: EDD MYERS
 Delivery By: FED EX
 Work Order:
 Purchase Order:

Analysis		Laboratory Analysis		Quality Assurance				
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
03/18	0845	BGM Chromium	0.05700 mg/L			EPA 200.7	1.54	97.6 *
03/18	0845	BGM Nickel	0.3530 mg/L	←		EPA 200.7	1.65	97.1 *
03/18	0845	BGM Copper	0.5990 mg/L			EPA 200.7	3.92	95.4 *
03/18	0845	BGM Zinc	7.2800 mg/L			EPA 200.7	5.28	90.0 *
03/18	1052	BGM Silver	< 0.0010 mg/L			EPA 200.7	1.98	101.0 *
03/18	0845	BGM Cadmium	0.0130 mg/L			EPA 200.7	0.40	94.8 *
03/18	0845	BGM Lead	< 0.0100 mg/L			EPA 200.7	0.00	101.1 *

* 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.

JBYC

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: 1103010544
 Customer Name: NIDEC MOTOR CORPORATION
 Customer Number: 478
 Report Date: 04/01/11

Sample Date: 03/29/11
 Sample Time: 0800
 Sample Type: GRAB WATER
 Sample From: WASTEWATER

Collected By: EDD MYERS
 Delivery By: FEDEX
 Work Order:
 Purchase Order:

Laboratory Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision & RPD	Quality Assurance & Recovery
03/31	0916	BGM	Chromium	0.06200 mg/L			EPA 200.7	2.02	98.8 *
03/31	0916	BGM	Nickel	0.1400 mg/L			EPA 200.7	0.10	98.5 *
03/31	0916	BGM	Copper	0.2610 mg/L			EPA 200.7	4.65	99.9 *
03/31	0916	BGM	Zinc	5.0690 mg/L			EPA 200.7	1.94	92.7 *
03/31	1043	BGM	Silver	< 0.0010 mg/L			EPA 200.7	3.20	96.4 *
03/31	0916	BGM	Cadmium	< 0.0040 mg/L			EPA 200.7	1.87	96.4 *
03/31	0916	BGM	Lead	0.0110 mg/L			EPA 200.7	1.80	105.6 *

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Signature *John Brown*
 Environmental Services Co., Inc.

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



Environmental Services Company, 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				Purchase Order #:									
Mena, AR 71953-2599				Work Order #:									
Telephone: 479-394-8761				Sampler Name(s): EDD MYERS									
Contact: Mr. Aaron Exley				and Signature(s): <i>Aaron Exley</i>									
FAX: 479-394-8805													
ESC Client Number: 478													
Sample Identification		Sample Collection			Sample Containers								
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#				
Wastewater		3/29/11	8:00 AM	Grab	Water	Plastic	1 Liter	HNO3	1	X	Zinc (30.IW) METALS: SEE COMMENTS		
Relinquished By: (Signature and Printed Name) <i>Ed Myers</i>		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Custody Seals:					
Relinquished By: (Signature and Printed Name) <i>Ed Myers</i>		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Used?	Intact?				
Relinquished By: (Signature and Printed Name)		Date	Time	Received for Lab By: (Signature and Printed Name)		Date	Time	Turnaround:	Regular	Special			
Cool all samples to ≤ 6 degrees C with ice.		Flow Data		Field Test	Time	Analyst	Result	Result	Units				
Comments: METALS (P/18.IW), CR (24.IW), BE (87.IW)		Analyst:		Time:	Reading:	Units:	Chlorinated? Y N	Fecal Start:					
MI (28.IW), Hg (47.IW), Zn (30.IW)		Time:		Reading:	Units:	Chlorinated? Y N	Fecal Start:						
Cooling for Metals analyses not required.		Time:		Reading:	Units:	Chlorinated? Y N	Fecal Start:						
This Document is Page 1		Time:		Reading:	Units:	Chlorinated? Y N	Fecal Start:						

TALKER TO DEBBIE ABBOTT CHANGES

Directions

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: 1104010385
 Customer Name : NIDEC MOTOR CORPORATION
 Customer/Permit No. : 478 / Cat pretreatmt
 Report Date : 04/20/11

Sample Date : 04/12/11
 Sample Time : 1055
 Sample Type : GRAB WWATER
 Sample From : WASTEWATER

Collected By: EDD MYERS
 Delivery By : FEDEX
 Work Order :
 Purchase Order :

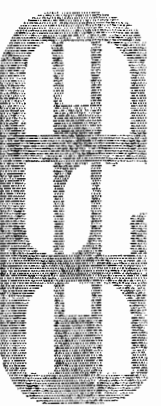
Analysis	Parameter	Result	Notes	Quantity	Method	Quality Assurance
Date 04/18 1000 NTR	Cyanide Total (as CN)	< 0.0100 mg/L			SM 18th 4500-CN E	Precision % RPD 3.91 Accuracy % Recovery 93.7 *

* QA data shown is from a different sample or standard on the same date.

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Signature *Ed D. Myers*
 Environmental Services Co., Inc.

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 Corporate Office
 13715 West Markham P.O. Box 55146
 Little Rock, AR 72211 Little Rock, AR 72215
 Website: www.esclabs.com



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 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 #:				TTO (81.T organics)					
Address: 500 Morrow Street				Purchase Order #:				TTO Metals (see comments)					
Mena, AR 71953-2599				Work Order #:				Zn (30.IW) only					
Telephone: 479-394-8757				Sampler Name(s): Edd Myers				Cyanide (9)					
FAX: Mr. Aaron Exley				and Signature(s): <i>E. Myers</i>									
Contact: 479-394-8805													
ESC Client Number: 478													
Sample Identification		Sample Collection		Sample Containers									
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#				
				Grab	Wwater	Glass	VOA	HCl	2				
				Grab	Wwater	Glass	1 Liter	≤ 6 deg C	3				
				Grab	Wwater	Plastic	1 Liter	HNO3	1				
WASTE WATER	1104010385	1-12-11	10:55 AM	Grab	Wwater	Plastic	1 Liter	NaOH+Asc Acid	1				
Requisitioned By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Custody Seals:					
<i>Edd Myers</i>		1-12-11	11:05 AM	<i>Edd Myers</i>		4-13-11	1415	Used?	<input type="checkbox"/>	Intact?	<input type="checkbox"/>		
Requisitioned By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Turnaround:	<input type="checkbox"/>	Special	<input type="checkbox"/>		
<i>Edd Myers</i>		4/13/11	1600	<i>Edd Myers</i>		4-13-11	1600	Regular	<input type="checkbox"/>	Were samples properly preserved:	<input type="checkbox"/>		
Requisitioned By: (Signature and Printed Name)		Date	Time	Received for Lab By: (Signature and Printed Name)		Date	Time	Special	<input type="checkbox"/>	Yes	<input type="checkbox"/>		
<i>Edd Myers</i>				<i>Edd Myers</i>		4-13-11	1600	No	<input type="checkbox"/>	Result	<input type="checkbox"/>		
All samples cooled to ≤ 6 degrees C with ice.				Comments: <i>Flow Data</i>				Chlorinated? Y N					
				Field Test				Fecal Stat:					
				Reading:				This Document is Page ___ of ___					
				Units:									

DA

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 : 1104010359
 Customer Name : NIDEC MOTOR CORPORATION
 Customer/Permit No. : 478 / Cat pretreatmt
 Report Date : 04/13/11

Sample Date : 04/07/11
 Sample Time : 1640
 Sample Type : GRAB WWATER
 Sample From : BATCH 1

Collected By: CWD
 Delivery By : CWD
 Work Order :
 Purchase Order :

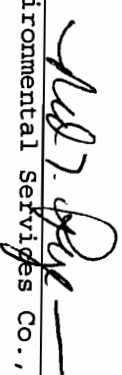
Laboratory Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method
04/12	0945	BGM	Zinc	3.0400 mg/L	(b)		EPA 200.7

Precision	Accuracy
% RPD 4.00	% Recovery 90.6 *

* QA data shown is from a different sample or standard on the same date.
 (b) Exceeds Permit Limits for Maximum Concentration

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.

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: 1104010360
 Customer Name : NIDEC MOTOR CORPORATION
 Customer/Permit No. : 478 / Cat pretreatmt
 Report Date : 04/13/11

Sample Date : 04/07/11
 Sample Time : 1645
 Sample Type : GRAB WATER
 Sample From : BATCH 2

Collected By: CWD
 Delivery By : CWD
 Work Order :
 Purchase Order :

Analysis		Laboratory Analysis				
Date	Time By	Parameter	Result	Notes	Quantity	Method
04/12	0945	BGM	Zinc	1.9600 mg/L	(b)	EPA 200.7

Quality Assurance
 Precision % RPD 4.00
 Accuracy % Recovery 90.6 *

* QA data shown is from a different sample or standard on the same date.
 (b) Exceeds Permit Limits for Average Concentration

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.

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



Environmental Services Cor. y, 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 #:				TTO (81.T organics)					
Address:		500 Morrow Street		Purchase Order #:				TTO Metals (see comments)					
Telephone:		Mena, AR 71953-2599		Work Order #:				Zn (30.IW) only					
FAX:		479-394-8757		Sampler Name(s):		Walter D. Morris		Cyanide (9)					
Contact:		Mr. Aaron Exley		and Signature(s):									
ESC Client Number:		478											
Sample Identification				Sample Collection				Sample Containers					
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#				
Bark 1	1104010359	4-7-11	1640	Grab	Wwater	Glass	VOA	HCl	2	<input checked="" type="checkbox"/>			
				Grab	Wwater	Glass	1 Liter	≤ 6 deg C	3	<input checked="" type="checkbox"/>			
				Grab	Wwater	Plastic	1 Liter	HNO3	1	<input checked="" type="checkbox"/>			
				Grab	Wwater	Plastic	1 Liter	NaOH+Asc Acid	1	<input checked="" type="checkbox"/>			
Relinquished By: (Signature and Printed Name)				Received By: (Signature and Printed Name)				Custody Seals:					
								Used? <input checked="" type="checkbox"/> Intact? <input type="checkbox"/>					
Relinquished By: (Signature and Printed Name)				Received By: (Signature and Printed Name)				Turnaround: Regular <input checked="" type="checkbox"/> Special <input type="checkbox"/>					
								Were samples properly preserved: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
Relinquished By: (Signature and Printed Name)				Received By: (Signature and Printed Name)				Result					
Comments: TTO Metals: Cd(48.IW), Cr(24.IW), Cu(29.IW) Pb(82.IW), Ni(28.IW)				Flow Data				Field Test					
Ag(47.IW), Zn(30.IW)													
All samples cooled to ≤ 6 degrees C with ice.													
Analyst:				Field Test:				Result					
Reading:				Units:				This Document is Page 1 of 1					



Aaron Exley
Environmental, Health &
Safety Manager

4/12/2011

Allen Gilliam
ADEQ State Pretreatment Coordinator
5301 Northshore Drive
North Little Rock, AR 72118-5317

Mary Timmons
General Manager
Mena Wastewater Utilities
701 Mena Street
Mena, AR 71953

Dear Mr. Gilliam and Ms. Timmons,

On 4/6/2011 I called the City of Mena POTW and spoke with Matt Cannon. I reported that our Zinc samples that we took for our April DMR report came back indicating a high Zinc mg/l number. The last grab sample was 5.069 mg/l and our first test was 7.28 mg/l.

The two problematic batch (1300 Gallons) discharges were detected while sampling for our April DMR report. Sample one was taken on 3/4/2011. When we received the results we discussed the situation and felt the problem might have been due to an error by a new operator who had replaced our long-time operator of the wastewater system. We had Harchem, our pretreatment system designer and chemical supplier, review our system and the operator's practices and confirm that there were no apparent issues. Sample two taken on 3/29/2011 was taken with Harchem on hand to assist. The results of this sample received 4/6/2011 also came in high for Zinc. I called the POTW on 4/6/2011 to report the exceedances.

Things Nidec is doing to resolve the issue:

We are currently testing for Zinc in our batches using a test Kit purchased from MSC for Zinc. This is not a compliant EPA 200.7 test but should give us an indicator if our Zinc level is acceptable to send to the POTW. If a batch fails we will send the batch back to our 1st tank and treat the batch again to precipitate the solids. Nidec started this on 4/7/2011.

Matt Cannon and Mike Spencer of the Mena Wastewater Utilities came to the Nidec Facility on 4/7/2011 to use the POTW's Zinc meter to help us understand where the problem might be coming from. Using the POTW's HACH meter we determined the two batches we had on hand to not have Zinc levels that would cause a problem for the POTW. The city's meter indicated "0" Zinc present. I also checked the batches with a test tube device purchased from MSC and got similar results to the

NIDEC MOTOR CORPORATION

IM&S DIVISION, US MOTORS, 500 N. MORROW STREET, MENA, AR 71953
PHONE: (479)-394-8741 FAX: (479) 394-8888 EMAIL: aaron.exley@nidec-motor.com



Aaron Exley
Environmental, Health &
Safety Manager

HACH 830 meter. Nidec will check our batches with the test tube method before dumping a batch to the POTW. The two batches that Matt and Mike tested and found to be reading zero on Zinc were sampled at 4:20 pm and 4:23 pm on 4/7/2011 by ESC Labs and the samples taken to Little Rock. We should have the results this week.

ESC Labs has set up a data base for our samples that will notify us of any issues with our samples as early as possible. This was started on 4/8/2011

I called Mr. Gilliam on 4/8/2011 and explained the situation and what we had done so far to find the Zinc problem.

Harchem will be here 4/12/2011 to closer examine our wastewater treatment process. We will review our sampling methods with Harchem when they are here to make sure the correct equipment is being used.

Specification sheets on our castings are being looked at but Zinc, if present, would be present in very small amounts. Chris Midolo, Nidec Purchasing Manager, was contacted on 4/8/2011 about any changes in the casting specifications and he was not aware of any.

Attached are copies of the Lab reports and Chain of Custody. I also included copies of the Waste water Treatment Work Sheet used by Nidec's Environmental Operator when processing a batch of waste water.

Sincerely,


Aaron Exley

CC: Mike Spencer – Mena POTW
Matt Cannon – Mena POTW
Randy Wiseman - Nidec

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T O M P

TOXIC ORGANIC MANAGEMENT PLAN

Nidec Motor Corporation

FLUID SYSTEMS DIV.

**500 NORTH MORROW ST.
MENA, ARKANSAS
71953**

REVISED BY:

Aaron Exley
ENVIRONMENTAL, HEALTH & SAFETY MANAGER
Revised April 8, 2011

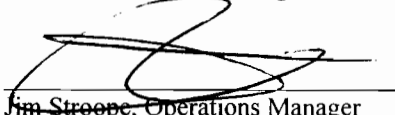
TOXIC ORGANIC MANAGEMENT PLAN (PAGE 1)

The **Nidec Motor Corporation** facility located in Mena, Arkansas desires to be recognized as a company firmly committed to good environmental stewardship. Nidec Motor Corporation has programs in place to minimize pollution in the areas of air, wastewater, solid waste, hazardous waste and recycling. Every effort is made where possible to remove hazardous and toxic materials from the plant and replace them with safer, less toxic products, often resulting in increased operating costs. It is believed that this philosophy results in a safer, more productive work environment for both employees and the surrounding community. Nidec Motor Corporation has no plans to change the course of this objective.

Every effort will be made by Nidec Motor Corporation management to insure that this TOMP is followed as written by all affected Nidec employees as a routine part of their job. The purpose of this TOMP is to insure that Toxic Organics will not be placed in the sanitary sewer system for the purpose of disposal or otherwise and furthermore, that every effort will be taken to keep Toxic Organics out of the sewer in the event of an accidental spill.



Mark Kinder, Plant Manager



Jim Stroope, Operations Manager



Aaron Exley, Environmental Health & Safety Manager

Process Summary

Nidec Motor Corporation is located on approximately 34 acres in Mena, Arkansas. The facility has grown considerably since opening in 1965. Presently, the main building covers approximately 320,735 sq. ft., and building #2 covers approximately 39,989 sq. ft. Nidec currently employs about 352 employees on three shifts. While the principal product produced by this facility is electric motors in the hp range of 15 to 5000, the numerous ongoing processes within the plant are quite complex and varied. An abbreviated list of major processes taking place at this facility follows:

- > ALUMINUM DIE CASTING
- > CAST IRON & ALUMINUM MACHINING
- > LAMINATION STAMPING
- > SHAFT MACHINING, GRINDING AND FINISHING
- > BRUSH NICKEL PLATING
- > MIG & TIG WELDING AND FABRICATION
- > COPPER WIRE WINDING, INSERTING AND FORMING
- > SURFACE COATING
- > MOTOR ASSEMBLY AND TESTING
- > PACKAGING, SHIPPING AND RECEIVING

Products produced are sold to various customers, both within the United States and abroad. Additionally, motor components such as shafts, rotors, laminations, brackets, etc. are made at Mena and then shipped to other Nidec Motor Corporation manufacturing facilities or customers. Not counting these components, this facility ships approximately 22 motors every working day.

Toxic Organic Inventory

Based on an engineering survey of the Nidec Motor Corporation facility including plant tours, review of MSDS files, purchasing records and knowledge of plant operations, the following toxic organic materials are known to be present in the facility in significant amounts.

Xylene (Mixed Isomers), Lacquer Thinner, and Acetone

Most ferrous metal parts either manufactured or purchased, are painted before use. The primary solvents used in this paint are Xylene, Lacquer thinner, and Acetone. Paint level is maintained manually. Metal drums containing paint and solvent are used as part of the airless, air-assisted, and HVLP painting systems used for prime paint and surface coating operations. When it becomes necessary to dispose of all or part of the paint, paint is pumped into 55 gallon metal drums. Material designated as hazardous waste is kept on site in a designated storage area no more than 180 days before being shipped by a permitted transporter to a permitted TSDF (Treatment, Storage, and Disposal Facility).

Storage Facilities

All toxic organic materials are received in bulk form, generally in 55 gallon drums. Upon receipt, these materials are moved to the drum storage building by shipping and receiving department personnel. This is a covered structure equipped with metal racks designed for vertical drum storage. Any leakage or damage to drums is corrected when discovered. Ample supplies of adsorbent material (floor dry, adsorbent socks etc.) are kept on hand outside this building at all times to contain any spills. A secondary containment pit is in place inside the building to catch up to approximately 350 gallons of spilled materials.

Inventory Quantities

The following table approximates maximum quantities of toxic organics on site.

MATERIAL	BULK STORAGE	SITE STORAGE	IN USE	AS WASTE
XYLENE	NA	55 GAL	55 GAL	5 GAL
LACQUER	NA	55 GAL	55 GAL	5 GAL
THINNER				
ACETONE	NA	55 GAL	55 GAL	5 GAL

Training

The plant Environmental/ Safety Manager attends annual training provided by Nidec Motor Corporation's Environmental Department equivalent to approximately 16 hours. All employees whose job description might require them to participate in a chemical spill, receive annual RCRA training onsite. All employees receive annual storm water pollution prevention training onsite and are trained in the proper disposal of hazardous chemicals. The Environmental, Health & Safety Manager reports directly to the plant manager and meets with the plant staff weekly to keep them apprised of current environmental matters. The plant Environmental, Health & Safety Manager is responsible for insuring that all environmental training requirements are kept current.

Inspections

At least weekly, the Environmental, Health & Safety Manager or the Environmental Operator will inspect all areas of the plant where toxic organics are being stored or used. Any indication of improper or unauthorized use of materials will be noted, corrected and brought to the attention of the responsible supervisor.

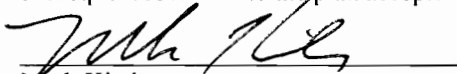
The accumulation site for drummed waste awaiting disposal is inspected daily by the Environmental Operator or the Environmental, Health & Safety Manager. This inspection is documented in a computer file kept in the Environmental Office.

TOXIC ORGANIC MANAGEMENT PLAN (PAGE 4)

Certification

The following certification statement will be attached to each DMR submitted to the Arkansas Department of Environmental Quality, Pretreatment Division.

Based on my inquiry of the person or persons directly responsible for managing compliance with the TTO limitations, 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 DMR report. I further certify that this facility is implementing the Toxic Organic Management Plan submitted to the ADEQ on September 15, 2006 and any subsequent revisions to the plan accepted by the ADEQ.



Mark Kinder
Plant Manager
NIDEC MOTOR CORPORATION
Mena, Arkansas

4-11-2011
Date