



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director



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BUTLER

AERONCA INC

SARLE, EDWARD

2007/06/13



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

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Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korfeski, Director

June 13, 2007

Mr. Michael Grimmer
Magellan Aerospace Corporation
2320 Wedekind Drive
Middletown, Ohio 45402

Re: Butler County, Aeronca, Inc., Compliance Evaluation Inspection

Dear Mr. Grimmer:

On June 5, 2007, I conducted a Compliance Evaluation Inspection at this facility (NPDES Permit No. OH0009156; OEPA Permit No. 11C00003*DD). Representing this facility was Emma Reed. A copy of my inspection report is enclosed.

The inspection report contained two unsatisfactory areas. The Effluent / Receiving Waters section was rated unsatisfactory as a result of the NPDES Permit violations. The Records / Reports section was rated unsatisfactory as a result of the failure to submit timely Monthly Operating Reports for October 2004 through February 2006.

The areas noted in the report summary will require a written response by June 29, 2007. The response should include a description of the proposed actions and the dates for completion of these actions.

If you have any questions, please call me at (937) 285-6096.

Sincerely,

Ned Sarle
Division of Surface Water
Permits Section

Enclosure

cc: David Duritsch, City of Middletown
Emma Reed, Aeronca, Inc.





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State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data-System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11C00003*DD	OH0009156	6/5/2007	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Aeronca Middletown Facility 2320 Wedekind Drive Middletown, Ohio 45042	12:30 P.M.	2/1/2003
	Exit Time	Permit Expiration Date
	2:40 P.M.	1/31/2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Emma Reed, EHS Coordinator	(513) 422-2751 ext. 369	
Name, Address and Title of Responsible Official	Phone Number	
Michael Grimmer, Division Manager 2320 Wedekind Drive Middletown, Ohio 45042	(513) 422-2751 ext. 201	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
U	Records/Reports	S	Laboratory	S	Compliance Schedule
S	Operations & Maintenance	U	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See Attached Summary of Findings / Comments.	
Inspector	Reviewer
 6/13/07 Date	 6/13/07 Date
Ned Sarle Permit Section Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Summary of Findings / Comments

Areas Requiring a Response

A review of the Monthly Operating Reports (MORs) for April 2003 through April 2007 indicated numerous NPDES Permit violations. A listing of these violations is enclosed on Attachment I. Aeronca addressed these violations as required by the NPDES Permit as detailed in Part III, Section 11 titled "Noncompliance Notification."

The silver violations occurred due to malfunctions with the silver recovery unit. This unit treats wastewater generated from the x-ray film development. This recovery unit was replaced several months ago. In 2003 and 2004, Aeronca discharged this wastewater to a holding tank. Silver violations were not reported for this period. If the new silver recovery unit fails to work, strong consideration should be given to hauling this wastewater off site.

The zinc violations occurred since July 2005. These violations appear to be associated with the storm water runoff from the front property. This area, owned by the City of Middletown, contained buildings that have been demolished this past year. Elevated zinc levels have been documented in the storm water runoff from this area. Middletown indicated that additional fill and topsoil will be brought to the site. Final grading and seeding should be completed in the next two months. The final site grading will direct the storm water runoff from the Aeronca site.

The copper violations have been attributed to the effluent pump station and/or effluent composite sampler. The 40 year old effluent pumps, which contain brass casings, are in the process of being replaced. Aeronca should complete this work as soon as possible. If these upgrades fail to eliminate the copper violations, additional actions must be taken by Aeronca. These actions may need to include replacing the effluent composite sampler.

Aeronca must take all necessary actions to eliminate these violations as soon as possible. The failure to eliminate these violations may result in enforcement action pursuant to Ohio Revised Code Chapter 6111. Aeronca is required to fully detail what additional actions will be proposed to eliminate these violations and the dates for completion of these actions.

The MORs for the reviewed period indicated that the average daily flow rate was 0.34 MGD and the peak daily flow rate was 1.94 MGD. Reporting code "AN" has been indicated for weekends and holidays. The NPDES Permit requires the flow rate be monitored and reported for these days.

Areas Not Requiring a Response

The NPDES Permit requires that the MORs be submitted by the 15th of the following month. Aeronca failed to submit the MORs for October 2004 through February 2006. The Ohio EPA's April 27, 2006 Notice of Violation letter addressed these violations. Aeronca has now submitted these MORs. Subsequent MORs have also been submitted as required by the NPDES Permit.

The NPDES Permit expires on January 31, 2008. The NPDES Permit requires the renewal application be submitted at least 180 days prior to the expiration date of the permit. With the Great Miami River diversion dam gone, the Middletown Hydraulic Canal no longer has water flowing through it. With no dilution water available, Aeronca will be required to comply with Water Quality Standards at the end of the effluent pipe. Based on the latest Middletown WWTP Water Quality Support Document, the metal limits will be lower than contained in the current NPDES Permit. A copy of this document was provided during the inspection.

Two earthen settling lagoons are used for the brazing cleaning line. The brazing cleaning line consists of a soap cleaning tank, a rinse tank, an acid wash tank and a final rinse tank. The metal parts are then air dried. Two separate brazing lines are used for titanium and inconel metal parts. Inconel consists of a nickel based alloy with chromium and iron. The settling pond discharges to the effluent pump station. Three ground water monitoring wells are still installed around the settling ponds.

Aeronca also produces an assortment of noncontact cooling water and storm water runoff. This wastewater is also discharged to the effluent pump station prior to sampling at monitoring station 001.

Attachment I

Aeronca, Inc.

Effluent Limit Violations for February 2003 through April 2007

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
April 2003	Copper	Daily	mg/l	110	111
May 2003	Copper	Monthly	mg/l	66	69
May 2003	Copper	Daily	mg/l	110	132
June 2003	Copper	Monthly	mg/l	66	69
July 2003	Copper	Monthly	mg/l	66	85
July 2003	Copper	Daily	mg/l	110	113
December 2003	Copper	Monthly	mg/l	66	84
December 2003	Copper	Daily	mg/l	110	115
January 2004	Copper	Monthly	mg/l	66	71
February 2004	Copper	Monthly	mg/l	66	103
February 2004	Copper	Daily	mg/l	110	131
March 2004	Copper	Monthly	mg/l	66	120
March 2004	Copper	Daily	mg/l	110	116
March 2004	Copper	Daily	mg/l	110	139
March 2004	Copper	Daily	mg/l	110	126
April 2004	Copper	Monthly	mg/l	66	91
May 2004	Copper	Monthly	mg/l	66	106
May 2004	Copper	Daily	mg/l	110	112
May 2004	Copper	Daily	mg/l	110	157
June 2004	Copper	Monthly	mg/l	66	71
July 2004	Copper	Monthly	mg/l	66	91
July 2004	Copper	Daily	mg/l	110	126
July 2004	Copper	Daily	mg/l	110	111
December 2004	Copper	Monthly	mg/l	66	75
January 2005	Copper	Monthly	mg/l	66	80
February 2005	Copper	Monthly	mg/l	36	57
March 2005	Copper	Monthly	mg/l	36	59
March 2005	Silver	Monthly	mg/l	1.3	1.4
April 2005	Copper	Monthly	mg/l	36	59
April 2005	Silver	Monthly	mg/l	1.3	2.4
May 2005	Copper	Monthly	mg/l	36	53
June 2005	Copper	Monthly	mg/l	36	68
July 2005	Copper	Monthly	mg/l	36	74
July 2005	Copper	Monthly	kg/day	0.095	0.10
July 2005	Zinc	Daily	mg/l	330	352
July 2005	Zinc	Daily	mg/l	330	464
September 2005	Copper	Monthly	mg/l	36	59
October 2005	Copper	Monthly	mg/l	36	41

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
November 2005	Copper	Monthly	mg/l	36	50
December 2005	Copper	Monthly	mg/l	36	59
December 2005	Silver	Monthly	mg/l	1.3	3.5
December 2005	Copper	Daily	mg/l	110	115
January 2006	Copper	Monthly	mg/l	36	49
January 2006	Zinc	Daily	mg/l	330	332
February 2006	Copper	Monthly	mg/l	36	43
February 2006	Zinc	Daily	mg/l	330	338
March 2006	Copper	Monthly	mg/l	36	55
March 2006	Zinc	Daily	mg/l	330	331
April 2006	Copper	Monthly	mg/l	36	45
April 2006	Zinc	Daily	mg/l	330	381
May 2006	Copper	Monthly	mg/l	36	53
May 2006	Zinc	Daily	mg/l	330	582
May 2006	Zinc	Daily	kg/day	0.870	0.90
June 2006	Copper	Monthly	mg/l	36	52
June 2006	Silver	Monthly	mg/l	1.3	1.4
June 2006	Zinc	Daily	mg/l	330	471
July 2006	Copper	Monthly	mg/l	36	71
July 2006	Zinc	Daily	mg/l	330	358
July 2006	Copper	Daily	mg/l	110	121
July 2006	Zinc	Daily	mg/l	330	425
August 2006	Copper	Monthly	mg/l	36	43
August 2006	Silver	Monthly	mg/l	1.3	13
August 2006	Silver	Monthly	kg/day	0.0034	0.011
August 2006	Silver	Daily	mg/l	13	32
August 2006	Zinc	Daily	mg/l	330	342
August 2006	Silver	Daily	mg/l	13	15
September 2006	Copper	Monthly	mg/l	36	43
September 2006	Silver	Monthly	mg/l	1.3	14
September 2006	Silver	Monthly	kg/day	0.0034	0.012
September 2006	Silver	Daily	mg/l	13	20
September 2006	Silver	Daily	mg/l	13	36
October 2006	Copper	Monthly	mg/l	36	41
October 2006	Silver	Monthly	mg/l	1.3	71
October 2006	Silver	Monthly	kg/day	0.0034	0.065
October 2006	Silver	Daily	mg/l	13	280
October 2006	Silver	Daily	kg/day	0.034	0.26
November 2006	Silver	Monthly	mg/l	1.3	1.7
February 2007	Copper	Monthly	mg/l	36	69
February 2007	Copper	Monthly	kg/day	0.095	0.11
March 2007	Copper	Monthly	mg/l	36	57
March 2007	Copper	Monthly	kg/day	0.095	0.11
April 2007	Copper	Monthly	mg/l	36	62
April 2007	Copper	Monthly	kg/day	0.095	0.12
April 2007	Zinc	Daily	mg/l	330	349

