



Environmental  
Protection Agency

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



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BUTLER

AERONCA INC

SARLE, EDWARD

2009/09/01



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, Lieutenant Governor  
Chris Korleski, Director

September 1, 2009

Mr. Michael Grimmer  
Magellan Aerospace Corporation  
2320 Wedekind Drive  
Middletown, Ohio 45042

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

Dear Mr. Grimmer:

On August 20, 2009, a Compliance Evaluation Inspection was conducted at this facility (NPDES Permit No. OH0009156; OEPA Permit No. 11C00003\*DD). Representing this facility was Emma Reid. A copy of my inspection report is enclosed.

The inspection report contained one marginal area. The Effluent / Receiving Waters section was rated marginal as a result of the NPDES Permit violations. Aeronca has taken action to ensure proper effluent sampling. Since taking these actions, the reported effluent metal values have dropped significantly and effluent violations have not been reported. Hopefully, these actions will eliminate future effluent violations.

We continue to recommend use of a flow composite sampler at the effluent monitoring station. Please respond by October 1, 2009 with a description of how you plan to proceed.

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

Sincerely,

Ned Sarle  
Division of Surface Water  
Permits Section

Enclosure

ec: Emma Reid, Aeronca, Inc.







State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

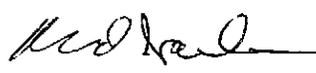
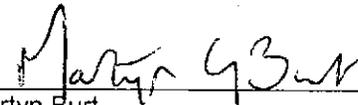
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11C00003*DD	OH0009156	8/20/2009	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Aeronca Facility 2320 Wedekind Drive Middletown, Ohio 45042	9:00 A.M.	2/1/2003
	Exit Time	Permit Expiration Date
	10:25 A.M.	1/31/2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Emma Reid, 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)					
<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Pretreatment			
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Compliance Schedule			
<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Self-Monitoring Program			
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Sludge Storage/Disposal	<input checked="" type="checkbox"/> Other			
<input checked="" type="checkbox"/> Collection System					

**Section D: Summary of Findings (Attach additional sheets if necessary)**

See Attached Summary of Findings / Comments.

Inspector	Reviewer
 Ned Sarle Permit Section Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
9/1/09 Date	9/1/09 Date

### **Summary of Findings / Comments**

A review of the Monthly Operating Reports (MORs) for November 2008 through July 2009 indicated several NPDES Permit violations. These violations are addressed on Attachment I. Aeronca addressed these violations as required by the NPDES Permit as detailed in Part III, Section 11 titled "Noncompliance Notification." For this period, the average daily flow rate was 0.43 MGD, and the peak daily flow rate was 0.65 MGD.

In the last inspection, concerns were noted about the effluent sampling protocol and the possibility of contaminating the effluent samples. In August 2008, the PVC effluent sampling line from the pump station force main was completely replaced with a stainless steel sampling line. In February 2009, the PVC effluent composite sampler container was also replaced with a HDPE sample container. This sampling protocol complies with the NPDES Permit and with 40 CFR 136. Since February 2009, the reported metal effluent results have dropped significantly. No effluent limit violations have been reported since January 2009.

The Ohio EPA continues to recommend that a composite sampler that uses polyvinyl or Teflon tubing and an appropriate composite sample container be provided. This sampling equipment should eliminate most chances the composite samples are contaminated and to allow for proper cleaning and/or replacement of the composite container and sampler tubing. Aeronca indicate in the last inspection response and during this inspection that they were willing to provide this equipment. To determine if a composite sampler could be used in the pump station wet well, Belmont Labs sampled the effluent using a commercial composite sampler while Aeronca conducted their normal composite sampling. Four duplicate sampling events were conducted. The sample results compared well with each other. Four more duplicate sampling events should be conducted. All sampling results should be submitted along with a proposal for installing a new composite sampler in the effluent pump station wet well. The Ohio EPA will evaluate this proposal to determine if it is acceptable. The composite sampler should be provided as soon as possible. Please respond by October 1, 2009 with a description of how you plan to proceed.

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

Effluent pump number two was replaced on February 20, 2009. The effluent discharge was noted as being clear and free of any solids.

Attachment I

Effluent Limit Violations for November 2008 through July 2009

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
January 2009	Copper	Monthly	mg/l	36	83
January 2009	Copper	Monthly	kg/day	0.095	0.14
January 2009	Copper	Daily	mg/l	110	240
January 2009	Copper	Daily	kg/day	0.290	0.42
January 2009	Zinc	Daily	mg/l	330	400



11-11-11