



State of Ohio Environmental Protection Agency

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MIAMI

GOODRICH AIRCRAFT WHEELS & BRAKES

WALBRIDGE, MATT 2007/12/10

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Kortleski, Director

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State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

December 10, 2007

RE: Compliance Evaluation Inspection and
Notice of Violation

Mr. Mark Hartman
Goodrich Corporation
101 Waco Street
P.O. Box 340
Troy, OH 45373

Dear Mr. Hartman:

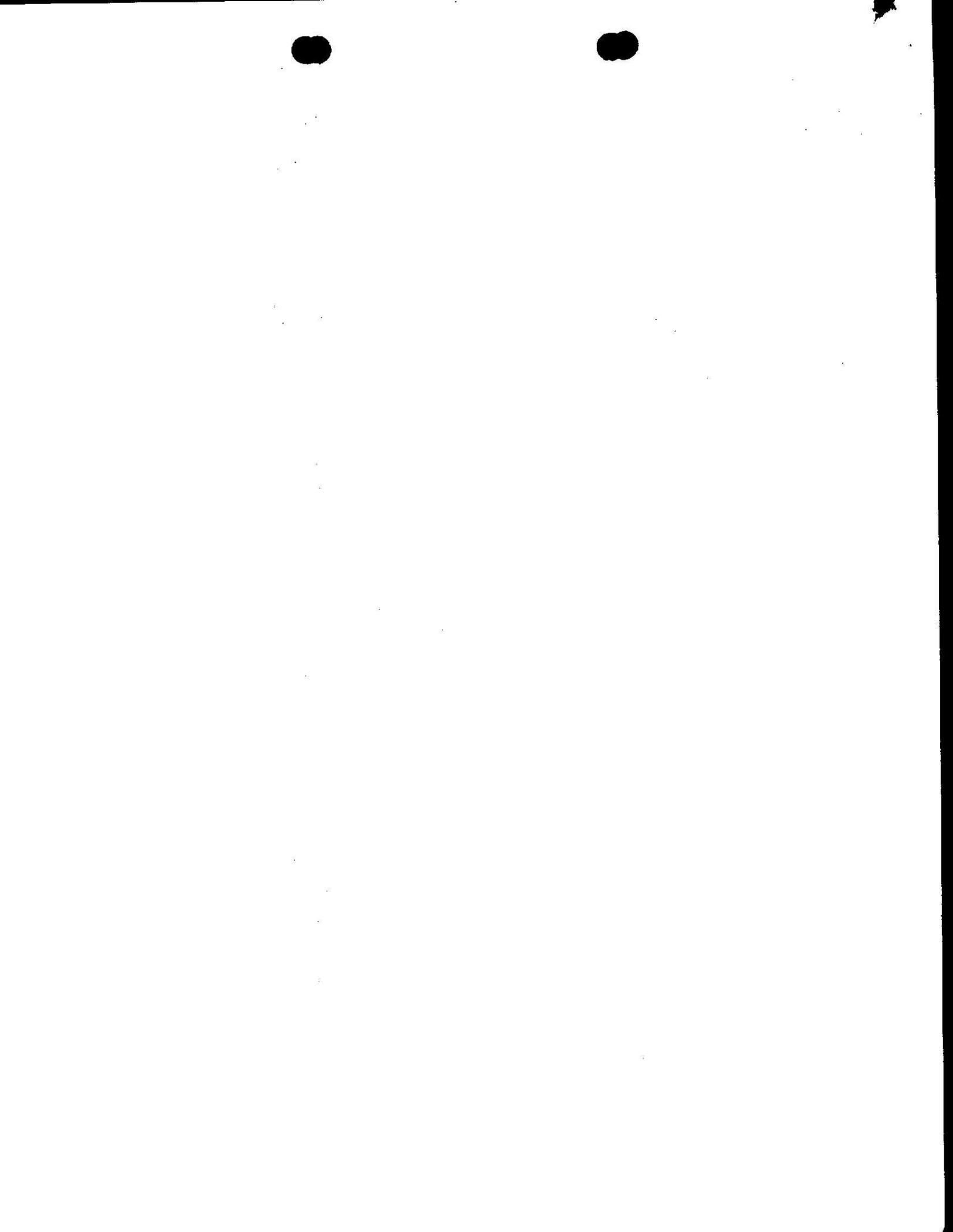
On November 2, 2007 I met with you to conduct an inspection of your facility with regard to its wastewater discharges to waters of the state. Since my previous inspection you have reported the following violations of your NPDES permit limit for pH and Total Residual Chlorine:

Date	Parameter	Limit	Result
April 27, 2007	pH	Not less than 6.5 S.U.	6.31 S.U.
May 3, 2007	Residual Chlorine	0.019 mg/l (Compliance limit = 0.05 mg/l)	0.07 mg/l
September 7, 2007	pH	Not less than 6.5 S.U.	6.44 S.U.

In discussing the pH violations, you speculated that they may have been caused by the City of Troy's water supply having a low pH. It is necessary for you to investigate this possibility by contacting the city and determining if this was indeed the case. If this does not point to the cause, you will need to look to other potential causes. Since pH results are obtained at the time of sample collection, you should be able to easily investigate the contributing sources to your outfall at that time to find out where the low pH water is coming from. Please be prepared to execute this investigation should violations occur in the future.

When you submitted your May 18, 2007 notification of the residual chlorine violation you did not provide the required explanation for the violation. Please note that your NPDES permit requires you to include the cause for the violation and the steps taken to eliminate and prevent future violations.

In reviewing your reported detection limit for residual chlorine, I noted that earlier this year you had been able to detect down to 0.01 mg/l but since August the detection level has returned to 0.05 mg/l which is the compliance limit in your permit. It is necessary for you to find out what it will take to allow your analytical equipment or procedures to again achieve a detection limit of 0.01 mg/l. Please provide me a written response indicating how you plan to address this issue.



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In our walk around the outside of the facility you noted that the fire water distribution system is tested once a month by opening valves at several places in the system which causes water to flood out onto the pavement for a few minutes. You indicated that you add extra dechlorination tablets when testing of the water distribution system occurs. I am interested in knowing what impact this water has on your ability to comply with the residual chlorine limit and ask that you collect and analyze discharge samples on days when water from these discharges is present at the discharge point. I would also appreciate an estimate of the volume of water associated with the discharge from testing of the water distribution system.

Please provide me a written response to the findings discussed in this letter by January 11, 2008. If you have any questions concerning this letter, please contact me at (937) 285-6095.

Sincerely,



Matt Walbridge
Division of Surface Water



Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding

Permit Number	NPDES Number	Inspection Date	Inspection Type	Inspector	Facility Type
11C00021*ED	OH0009318	11-2-07	C	S	2

Section B: Facility Data

Name and Location of Facility Inspected:	Entry Time	Permit Effective Date
Goodrich Corporation Aircraft Wheels and Brakes 101 Waco Street P.O. Box 340 Troy, OH 45373	1015	8-1-05
	Exit Time	Permit Expiration Date
	1045	7-31-10

Name(s) and Titles of On-Site Representative(s)	Phone Number(s)
Mark Hartman - Senior Environmental, Health and Safety Specialist	(937) 440-2312

Name, Title and Address of Responsible Official:	Phone Number
Tony Wurmel - Vice President of Operations Goodrich Corporation Aircraft Wheels and Brakes P.O. Box 340 101 Waco Street Troy, OH 45373	(937) 339-3811

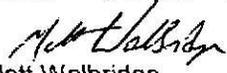
Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, NA = Not Applicable, NE = Not Evaluated)

S Permit	S Flow Measurement	NA Pretreatment
S Records/Reports	NA Laboratory	NA Compliance Schedules
S Operations & Maintenance	S Effluent/Receiving Waters	S Self-monitoring Program
S Facility Site Review	NA Sludge Storage/Disposal	Other
NA Collection System		

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

- Flow meter reads instantaneous flow rates throughout the day (data logger) and then sends an average value for the day to Mr. Hartman's desktop computer.
- Once per month the fire water system is tested by opening valves at several points in the system that then discharge onto the pavement 'for a few minutes'.
- Low pH values in April and September 2007 were not able to be explained. Speculated that city water supply might have had a low pH.

Name and Signature of Inspector(s)

 Matt Walbridge

Agency / Office / Telephone
 Ohio EPA / Southwest District Office / (937) 285-6095

Date
 12-10-07

Name and Signature of Reviewer

 Martyn G. Burt

Agency / Office / Telephone
 Ohio EPA / Southwest District Office / (937) 285-6034

Date
 12/10/07

