



State of Ohio Environmental Protection Agency

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MIAMI

GOODRICH AIRCRAFT WHEELS & BRAKES

WALBRIDGE, MATT 2009/08/07

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



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

August 7, 2009

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

Dear Mr. Hartman:

On August 3, 2009 I met with you to discuss your response to a recent effluent violation and to inspect the discharge. Since my previous inspection you have reported the following violations of your NPDES permit limit for Total Residual Chlorine:

Date	Result	Limit
June 11, 2008	0.14 mg/l	0.019 mg/l (Compliance limit = 0.05 mg/l)
July 25, 2008	0.07 mg/l	
June 18, 2009	0.07 mg/l	

Your explanation for June 11th violation was that a significant storm event occurred while you were out of the state and had washed the dechlorination tablets out of the chamber they are installed in. The July 25th violation was explained to be caused by the coincidental presence of fire suppression system test water and the June 18th violation being caused because there was no flow through the dechlorination chamber. Monitoring is done by Test America and they take a measurement regardless of flow conditions.

These chlorine limit violations normally would result in a call for better controls on Goodrich's dechlorination system. However, you informed me that in August 2008, the last source of non-contact cooling water was re-routed to the sanitary sewer. This leaves only the following sources discharging to waters of the state:

- Air conditioner condensate;
- Very small and very infrequent discharges of boiler blowdown from the boiler used to keep the fire water storage tank from freezing during the winter; and
- Fire suppression system test water (approximately 800 gallons) discharged on a monthly basis.

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As we discussed during the inspection, I believe that with the elimination of non-contact cooling water from the discharge your NPDES permit could be modified to remove monitoring and limits for residual chlorine. We would need a permit modification request from Goodrich to initiate this modification.

As I conveyed to you in my August 6th e-mail, there is an opportunity for Goodrich to be covered by only a General Permit for Industrial Storm Water if the boiler blowdown water can be re-routed to the sanitary sewer. This re-routing could involve simply collecting the blowdown into a container and transporting it a sanitary drain for disposal.

If coverage can be gained under the general storm water permit, Goodrich would develop, maintain, update and implement a storm water pollution prevention plan (SWP3) that should be simple given the limited exposure regulated activities and materials have to precipitation. I believe that the plan would need to address your practice of utilizing dechlorination tablets during days when fire suppression system test water is being discharged.

Please provide me a written response by September 4, 2009 indicating how you plan to address the permitting options I have presented in this letter. If you have any questions, please contact me at (937) 285-6095.

Sincerely,



Matt Walbridge
Division of Surface Water

ENCLOSURE





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	8-3-09	R	S	2

Section B: Facility Data

Name and Location of Facility Inspected: Goodrich Corporation Aircraft Wheels and Brakes 101 Waco Street P.O. Box 340 Troy, OH 45373	Entry Time	Permit Effective Date
	1130	8-1-05
	Exit Time	Permit Expiration Date
	1220	7-31-10
Name(s) and Titles of On-Site Representative(s)		Phone Number(s)
Mark Hartman - Senior Environmental, Health and Safety Specialist Brendan Coughlan - EH&S Specialist		(937) 440-2312 (937) 440-2096
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)

- There was only a trickle of a discharge and there was essentially no flow in the receiving stream.
- Goodrich stated that the only flow going through the outfall is air conditioner condensate and storm water.
- Dechlorination tablets dissolve in the stagnant water in the effluent chamber but are changed daily.
- When the pumps that used to feed the old carbon filter tank were turned on to recirculate the water in the effluent chamber, the water level drops and water in the pool downstream from the outfall flowed back into the effluent chamber.

Name and Signature of Inspector(s) Matt Walbridge	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6095	Date 8-7-09
Name and Signature of Reviewer Martyn G. Butt	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6034	Date 8/17/09

