



Environmental
Protection Agency

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



11M0000620100906

MONTGOME WRIGHT BROS AERO INC

WALBRIDGE, MATT 2010/09/06



**Environmental
Protection Agency**

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

September 3, 2010

RE: NPDES Compliance/Pre-permit Inspection

Mr. Kevin L. Franklin
Wright Bros. Aero, Inc.
3700 McCauley Drive
Vandalia, OH 45377

Dear Mr. Franklin:

Yesterday I met with Mr. Mike Strickland to inspect your facility's bulk fuel storage and load rack operations at the Dayton Airport relative to storm water runoff discharges to the unnamed tributary of Mill Creek. I appreciate your ability to accommodate my inspection on little notice along with Mike's willingness to show and explain all the operating procedures – including those out on the airport apron area. All areas I observed were clean and free of oily residues.

NPDES Permit Renewal

Most notable is that your NPDES permit is set to expire on December 31st and we have yet to receive a renewal application. Please note that your permit requires a renewal application 180 days prior to expiration of the permit. Because the courtesy renewal notice was addressed to a location without postal service (the tank farm on Cargo Road) I suspect that you were unaware of this renewal obligation.

I provided Mike the web address for the renewal application (Forms 1 and 2C) and he indicated that he would pass it on to you and that the renewal application would be submitted to our office soon. Please note that the application must be accompanied by an application fee of \$200 payable to Treasure, State of Ohio. If you have any questions concerning the permit renewal process, please call me.

Discharge Monitoring Reports

A review of your discharge monitoring reports since 2005 revealed no reported violations. However, I did note that all monitoring data is reported for the first date of the month. Please note that you are required to enter monitoring results for the day the sample was collected.

Kevin Franklin
September 3, 2010
Page 2

When a sample is collected, the collector should start a chain of custody sheet documenting the date and time the sample was collected, the name of the collector, the bottles/preservatives associated with each analyte and the date the samples were transferred to someone else (i.e. carrier or laboratory). Measurements collected in the field (such as pH) are typically recorded on the chain of custody sheet. If one exists, please send me a copy of the chain of custody for the sample collected in June (as scanned copy via e-mail would be fine). If chain of custody sheets are not available, I recommend you contact your contract lab to make arrangements to start using them.

Valve Maintenance

The automatic valve ahead of the oil/water separator ahead of outfall 002 did not close when the switch was activated. I suspect that the valve hasn't ever been operated and has become 'frozen'. I recommend that it be made functional again and then exercise it periodically so that it can be close should it ever be necessary.

Please work to get the necessary permit renewal application submitted as soon as possible. It is my intention to make significant reductions to the monitoring requirements in the permit (along with needed corrections) and the sooner the application is submitted the sooner I can initiate those changes.

If you have any questions concerning this letter or the attachment, please call me at (937) 285-6095.

Sincerely,



\ Matt Walbridge
Division of Surface Water

ATTACHMENT



Southwest District Office

NPDES COMPLIANCE INSPECTION REPORT

Section A: National Data System Coding

Permit Number	NPDES Number	Inspection Date	Inspection Type	Inspector	Facility Type
OH0071781	11M00006*DD	9-2-10	CEI / Recon	S	2

Section B: Facility Data

Name and Location of Facility Inspected:	Entry Time	Permit Effective Date
Wright Bros Aero, Inc 3632 Cargo Rd Vandalia, OH 45377	1400	1-1-06
	Exit Time	Permit Expiration Date
	1455	12-31-10

Name(s) and Titles of On-Site Representative(s)	Phone Number(s)
Mr. Mike Strickland - Airline Service Manager	(937) 272-5162

Name, Title and Address of Responsible Official:	Phone Number
Mr. Kevin Franklin V.P. Operations Wright Bros. Aero, Inc. 3700 McCauley Drive Vandalia, OH 45377	(937) 890-8900

Section C: Areas Evaluated During Inspection

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

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

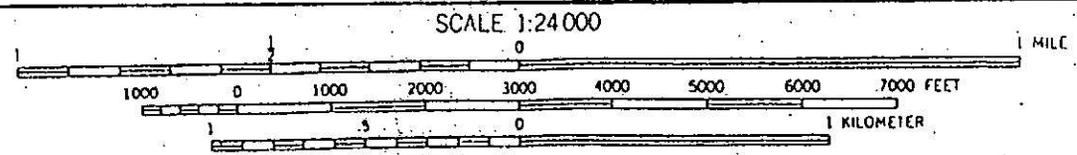
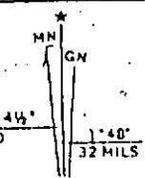
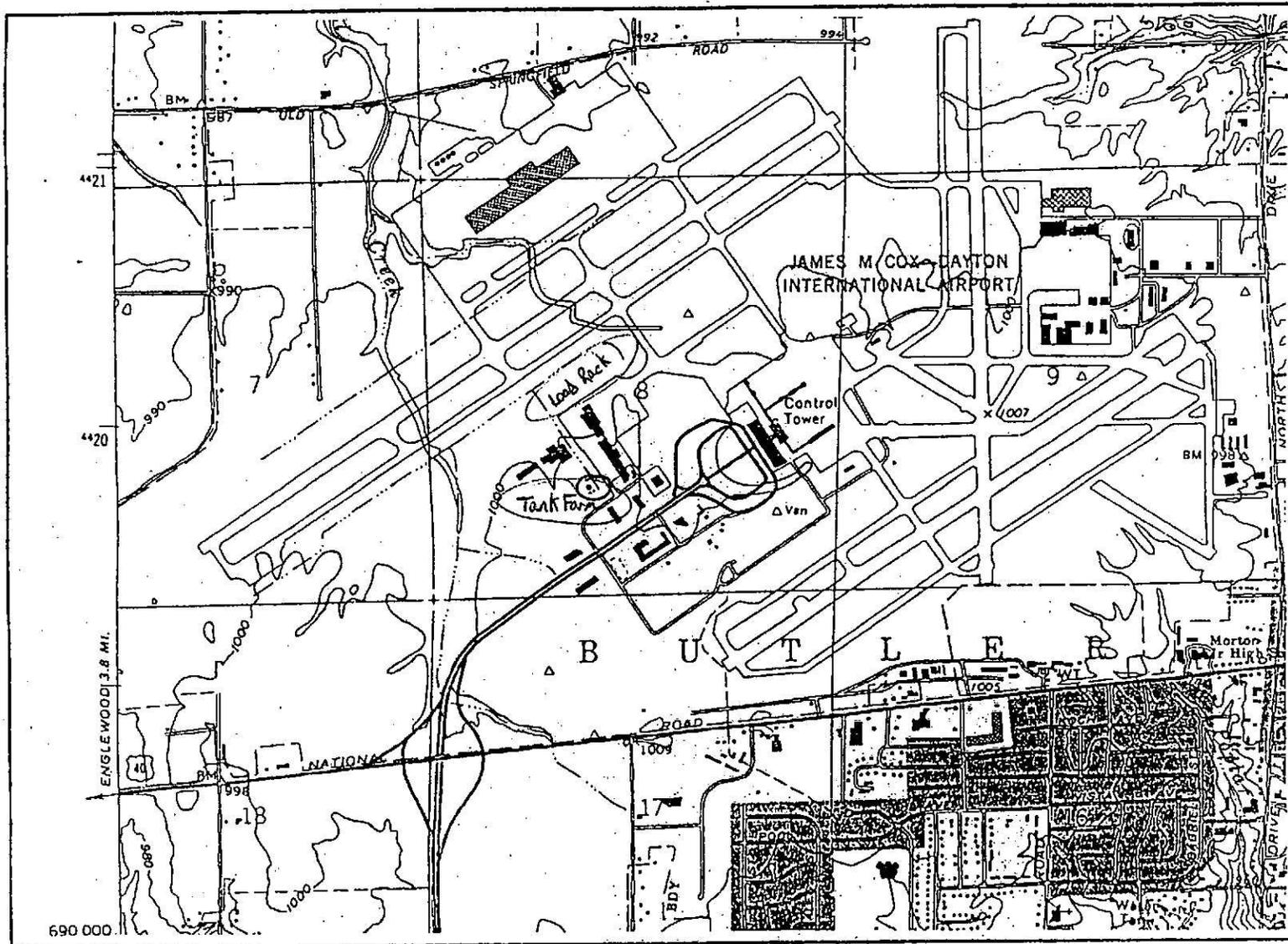
Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- **Renewal application has not yet been submitted. Renewal notice from Central Office was addressed to 3632 Cargo Road which is not a mailing address.**
- **Monitoring data is always dated the first of the month instead of the date it is collected.**
- **Discharge from outfall 001 is caused by runoff from load rack (flow into the oil/water separator equals flow out) and the discharge from the tank farm containment area and pump pad containment area which is controlled by valves on outlets those areas.**
- **Discharge from outfall 002 is caused by runoff from the load rack (flow into the oil/water separator equals flow out).**
- **The oil level in the separator is checked periodically and is pumped out if needed. Mike did not know when the last time the separator needed to be pumped.**
- **All areas are clean and free of residues.**
- **The automatic valve on the drain line into the separator serving outfall 002 appears to be stuck open. A turn handle as present but it was not determined if it could be used to close the valve. I recommend repairing the automatic valve and then exercising the valve regularly to keep it ready for use.**

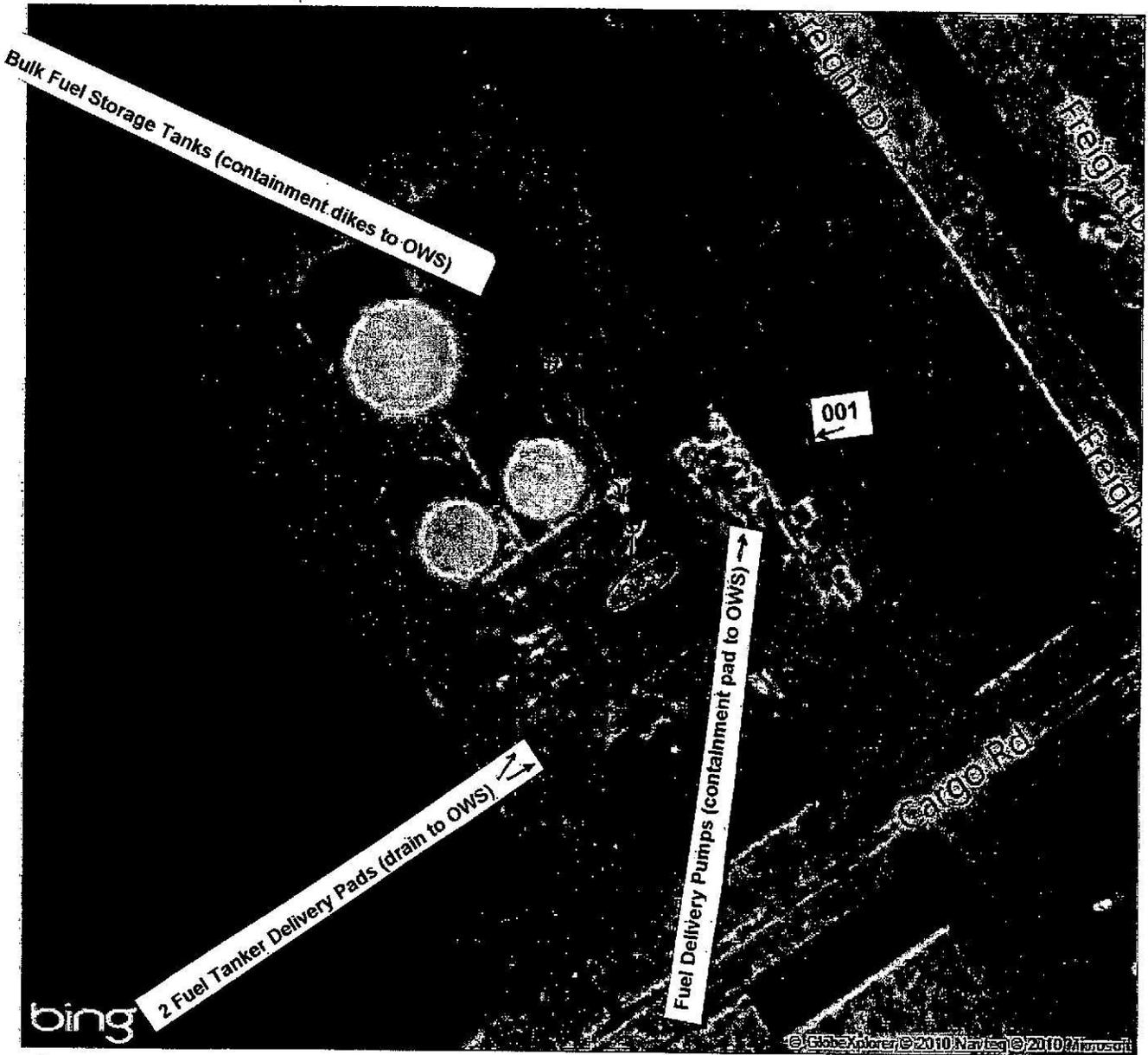
Name and Signature of Inspector(s) Matt Walbridge	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6095	Date 9-3-10
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Name and Signature of Inspector(s) 	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6034	Date 9/3/10
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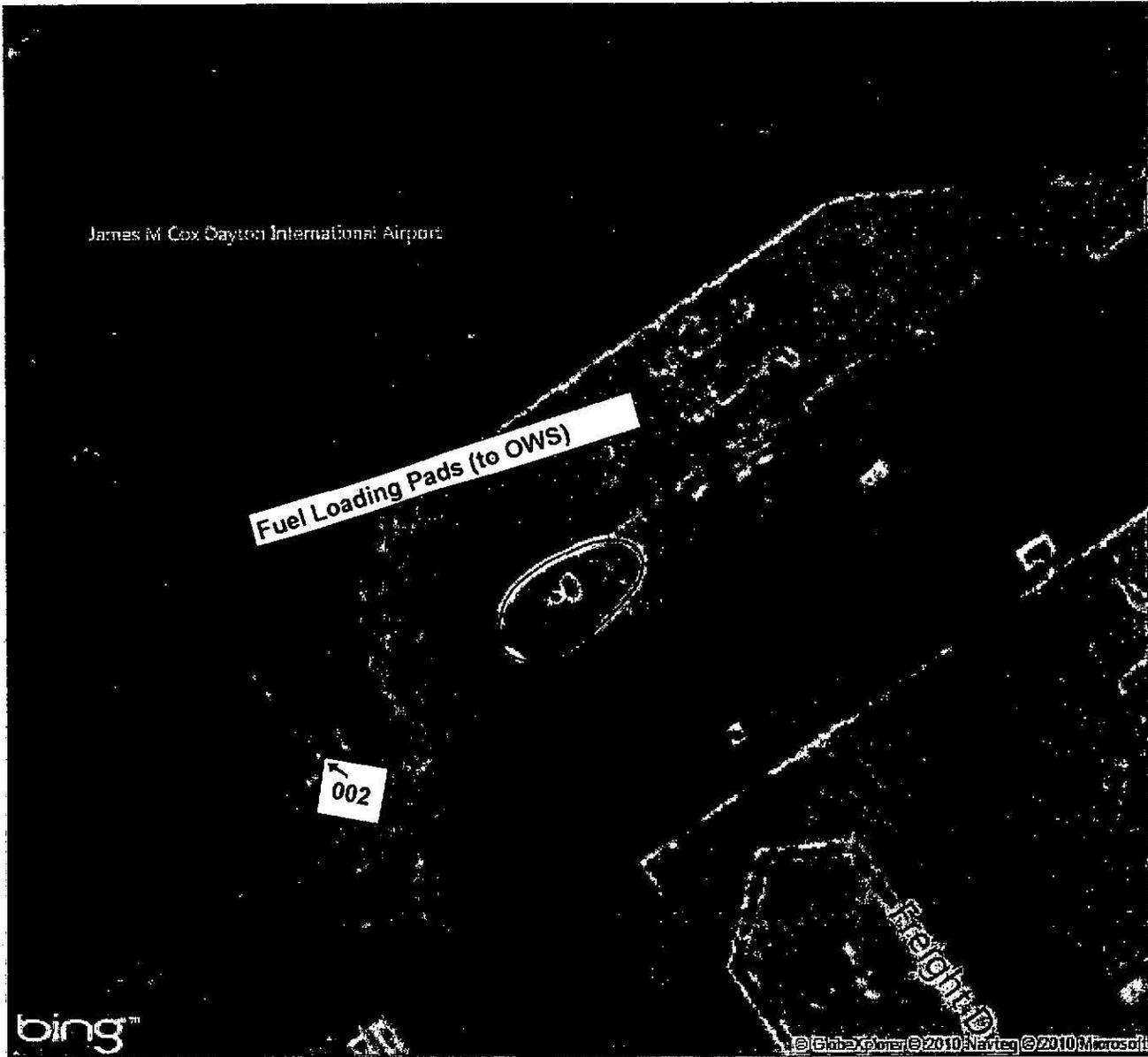
TIPP CITY QUADRANGLE
OHIO
7.5 MINUTE SERIES (TOPOGRAPHIC)



CONTOUR INTERVAL 10 FEET



Bird's eye view maps can't be printed, so another map view has been substituted.



Bird's eye view maps can't be printed, so another map view has been substituted.