



State of Ohio Environmental Protection Agency

Northeast District Office



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

August 5, 2008

RE: GOODRICH LANDING GEAR-PLATING
OHD 004 173 621
LARGE QUANTITY GENERATOR

Greg Goga
Goodrich
2800 East 33rd St.
Cleveland, OH 44115

Dear Mr. Goga:

On April 21, 2008, I received your letter and attachments which responded to my March 20, 2008 notice of violation letter. This was based on my March 5 and 10, 2008 inspection of Goodrich located at 2800 East 33rd Street, Cleveland, OH. We have also exchanged numerous emails, faxes, and phone conversations. Below I will outline the current status of the violations and concerns found during that inspection.

1. OAC rule 3745-65-52(D) - Emergency coordinator contact information in the contingency plan.
2. OAC rule 3745-65-52(E) - Contingency plan emergency equipment.
Your letter received on April 21, 2008 and its attachments document your correction of these violations (1 and 2).
3. OAC rule 3745-52-34(C)(1)(a) - Satellite accumulation area.
4. OAC rule 3745-52-34(C)(1)(b) - Satellite accumulation area.
5. OAC rule 3745-66-73(A) - Keeping containers closed.
6. OAC rule 3745-279-22(C) - Used oil labels.
Previously corrected (3,4,5, and 6).
7. OAC rule 3745-273-13 (D) - Universal waste lamp containers.
8. OAC rule 3745-273-14 (E) - Universal waste lamp labeling.
9. OAC rule 3745-273-16 - Employee training for handlers of universal waste.
Your letter received on April 21, 2008, and its attachments document your correction of these violations (7,8, and 9).

Other issues:

1. Containment area.
You stated the sludge-like material was removed which shows you have properly addressed this issue.
2. F006
You have told me that you have found that it is cost prohibitive to have your F006 waste reclaimed. This makes my original request for more information about the reclaiming no longer applicable.

3. Aluminum oxide.

My original concern with this waste was that it was spilling onto the ground and that I hadn't received any analytical data supporting your determination that it is not a hazardous waste. Now I understand that it is actually two wastes (80 grit and 220 grit) that are combined into a rolloff box before shipment. You have sent me analytical results for samples taken on March 31, 2008 and May, 19, 2008 which both show these wastes are hazardous wastes based on the TCLP level of cadmium found. Your most recent shipment of these wastes was of 15 yards to Envirote as D006 (cadmium) hazardous waste on June 24, 2008. **Please send me copies of shipping papers for any other shipments of these wastes that occurred during 2008.**

On August 4, 2008, you told me that you found out that employees had not been replacing the plugs in work pieces before blasting them. The plugs that had been cadmium plated were supposed to be removed and replaced with plugs that had not been cadmium plated prior to blasting. You said that for about a month now this plug replacement has been occurring and that you hope the waste is now nonhazardous. You plan to resample this waste this week and may have the results back by August 20, 2008. **Please send me a copy of these results when you receive them.**

The following additional violations have been found:

1. OAC rule 3745-65-31 – Maintenance and operation of facility.
This rule requires facilities be maintained and operated to minimize the possibility of a fire, explosion, or release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Goodrich violated this rule by having releases of the 80 grit aluminum oxide hazardous waste as seen on March 10, 2008, and May 16, 2008. On April 21, 2008 I received a letter from you which included a photograph showing that this waste had been cleaned up. On May 16, 2008 I returned to Goodrich to see the outlet pipe and bin for the 80 grit spent material. Once again this material had been released to the ground.

This waste must be cleaned up and process/equipment changes must be made to avoid these releases in the future. Please send me a description and photographs of these actions once they have been completed.

Please send a written response to this letter within 30 days including the documentation required above.

GOODRICH LANDING GEAR-PLATING
AUGUST 5, 2008
PAGE - 3 -

You can find copies of the regulations and other information on the Division of Hazardous Waste Management's web page at: <http://www.epa.state.oh.us/dhwm/>.

If you have any questions, please contact me at (330) 963-1217, or by e-mail at: robert.almquist@epa.state.oh.us.

Sincerely,



Robert Almquist
Division of Hazardous Waste Management

RA:ddw

cc: Natalie Oryshkewych, DHWM, NEDO
ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO
Bill Lutz, DHWM, NEDO
David Belisario, Goodrich Landing Gear

Notice: Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.

