



State of Ohio Environmental Protection Agency

Northeast District Office

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

September 10, 2008

**RE: GOODRICH LANDING GEAR-PLATING
OHD 004 173 621
LARGE QUANTITY GENERATOR
NOV and PRTC**

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

Dear Mr. Goga:

I received your August 26, 2008 letter and attachments which responded to an August 5, 2008 letter. These letters are follow up to my March 5 and 10, 2008 inspection of Goodrich located at 2800 East 33rd Street, Cleveland, Ohio. You previously documented a correction of all the violations originally cited from that inspection. You also provided the documentation requested regarding the concern found during the inspection of the management and shipping of aluminum oxide waste. The following violations have been found based on this documentation:

1. OAC rule 3745-52-11 – Hazardous waste determination.
This rule requires that any person who generates a waste must determine if that waste is a hazardous waste using the following method: (A) Determine if it is excluded, (B) Determine if it is listed, and (C) Determine if it is characteristic.

Goodrich violated this rule by not determining that its 80 grit and 220 grit wastes are hazardous wastes. Below is a chart outlining the data we have received regarding these two wastes.

Date	80 grit	220 grit
9-6-01	Haz for lead – don't know which one or if combination was tested	
9-17-01	Nonhaz – don't know which one or if combination was tested	
March 2004	Nonhaz for cadmium and chromium	Nonhaz for cadmium and chromium
4-3-08	No data	Haz for cadmium
5-22-08	Haz for cadmium	Nonhaz
8-8-08	Haz for lead	Nonhaz

No frequency for waste testing is set in the rules, however, with variable wastes such as these, 3 and 4 year periods between testing is not appropriate if you plan to manage the waste as a non-hazardous waste. Also, the hazardous waste determination is to be made at the point of generation. Therefore, each of these wastes must be tested separately (not after they have been combined for shipping purposes).

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As I understand in your August 26, 2008 letter, Goodrich plans to manage both of these wastes as hazardous wastes. This is appropriate unless further testing and/or process monitoring (such as monitoring the removal of cadmium plated plugs before sandblasting) is done. Another option would be to have this material reused in such a manner that it is not classified as a waste. If you plan to pursue that option, please contact the Division of Hazardous Waste Management's Regulatory Services Unit at (614) 644-2917.

2. Ohio Revised Code (ORC) 3734.02(F) – Causing hazardous waste to be transported to an unpermitted facility.
ORC 3734.02(F) states that no person shall cause hazardous waste to be transported except to (in general) a facility operating under a hazardous waste permit.

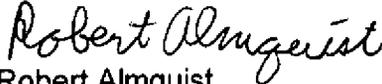
Goodrich violated this code by shipping 220 Grit Sandblast Cabinet hazardous waste to GMA Industries in Romulus, Michigan, on April 4, 2008. A sample of this waste was taken on March 31, 2008. You sent me a copy of the report for the analysis of that sample which is dated April 3, 2008.

My August 5, 2008 letter cited the violation of OAC rule 3745-65-31 – Maintenance and operation of a facility because of releases of 80 grit aluminum oxide hazardous waste. Your August 26, 2008 letter documented your correction of this violation.

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:cl

cc: Natalie Oryshkewych, DHWM, NEDO

ec: Frank Popotnik, DHWM, NEDO
Bill Lutz, DHWM, NEDO

Harry Sarvis, DHWM, CO
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.