



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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

August 28, 2008

RE: CRANE AEROSPACE  
LEAR ROMEC DIVISION  
PERMIT NO. 3IS00118  
LORAIN COUNTY

Mr. Mathew Maloney  
Environmental Health & Safety Manager  
Crane Aerospace  
241 South Abbe Road  
Elyria, Ohio 44036

Dear Mr. Maloney:

On August 13, 2008, an inspection of the above referenced facility was conducted. The facility was represented by you. The purpose of the inspection was to visually examine the effluent at the permitted outfalls, verify associated activities contributing to these outfalls, and determine the facility's general compliance with its NPDES permit.

During the inspection, the following items were noted/discussed:

1. You are responsible for collecting the samples at each outfall.
2. The samples are analyzed by Chemtron in Avon.
3. The discharges for the three outfalls are metered.
4. You started reporting the facility's analytical data through the new Web-based Electronic Discharge Monitoring Report , EDMR, system in February 2008.
5. Correspondence from this office dated September 28, 2004, indicated that three floor drains were identified that were not plugged. During the April 11, 2007 inspection, these drains did not appear to be entirely plugged. This office received the facility's letter dated May 17, 2007 which indicated these floor drains would be inspected and sealed. You confirmed this was completed.
6. Drums of chemicals continue to be stored on the back side of the building. These drums are not protected by any secondary containment. It was observed that a storm drain is located within close proximity to where these drums are stored. These drums should be stored indoors or secondary confinement should be provided. You indicated that you are pursuing spill containment for this drum area. You also indicated you would be submitting a capital expenditure request for this project by the end of the month.
7. Roll-off dumpsters are stored in the back of the facility underneath a roof. All materials should be placed entirely under the roof. Also, all oily shavings should be cleaned up on a regular basis. Currently, blowing rain can come into contact with the oily materials and flow down the storm drain. **Construction of side walls along with improved house keeping operations would greatly reduce the risk of oily waters from leaving the facility's property.**
8. All three permitted outfalls were examined. No oil sheen or other visual impact was observed.

This office has recently reviewed your self-monitoring reports covering the period April 1, 2007 thru July 31, 2008 for the referenced facility. Our review indicates violations of the terms and conditions of the facility's NPDES permit. The specific instances of non-compliance are as follows:

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	00400	pH	1D Conc	9.0	9.23	1/8/2008

No frequency violations were noted.

Please be advised that such instances of non-compliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens  
Environmental Engineer  
Division of surface Water

MWS/mlh