



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

August 14, 2012

Mr. Ben Stacy
Manager, Environmental Health and Safety
Hartzell Propeller, Inc.
One Propeller Place
Piqua, Ohio 45356

RE: SITE INSPECTIONS, NPDES PERMIT #'s 1GR00362*EG, 1GR01128*EG

Dear Mr. Stacy:

On Wednesday, August 8, 2012, I inspected Hartzell Propeller's facilities in and near Piqua, Ohio, to determine compliance with industrial storm water permitting requirements. Jordan Senne, a summer intern in Ohio EPA's Storm Water Program, accompanied me on this inspection. The facility was represented by you and Doug Laughman.

Based on my observations of each site's operations, and a review of relevant documents, it appears both facilities are in compliance with the terms of their general industrial storm water discharge permits.

There were no "significant materials" present in outdoor areas adjacent to buildings at each of the facilities. (The term is defined on page 113 of the Industrial Storm Water Permit.) The airport could easily qualify for the "No Exposure Certification" option under current Industrial Storm Water regulations.

At One Propeller Place, two potential contaminant sources are present, but it's possible the site could still qualify for the no exposure option. As long as rolloff boxes used to store waste don't leak and are covered with tarps, then exposure to rainfall is eliminated. You mentioned that waste is not added to the rolloffs if it's raining, which also eliminates exposure. The possibility of chrome being deposited on the roof from the building's ventilation system was discussed, and if it can be confirmed that roof runoff does not contain elevated levels of chrome, then the site could probably justify pursuing the no exposure option.

If Hartzell Propeller decides to pursue the no exposure option for its Piqua facilities, it can self-certify by answering "no" to each of the 11 questions in the "Exposure Checklist" at the top of page 2 of the no exposure certification form, which is available at the following web link:

http://www.epa.ohio.gov/portals/35/storm/no_exppaposure_certification_fis.pdf

Southwest District Office
401 East Fifth Street
Dayton, OH 45402-2911

937 | 285 6357
937 | 285 6249 (fax)
www.epa.ohio.gov

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The completed checklist is to be signed and sent in to Ohio EPA's Central Office in Columbus. This certification must be renewed every 5 years, assuming the company's activities have not changed such that "significant" materials are managed outdoors and exposed to rainstorms.

If Hartzell decides to keep its Industrial Storm Water Permit coverage, each site is only required to perform "visual assessments" of runoff samples collected on a quarterly basis. The permit discusses details of visual assessments on pages 19-21. It requires collecting samples from each outfall, unless it can be shown that outfalls are "substantially" identical. In that case, samples can be collected and assessed from individual outfalls on a rotating basis. More information about this can be found at the bottom of page 20 of the permit.

If you have any questions related to this inspection, I can be contacted at (937) 285-6442, or via email at chris.cotton@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Cotton". The signature is fluid and cursive, with the first name "Chris" and last name "Cotton" clearly distinguishable.

Chris Cotton
Environmental Specialist II
Division of Surface Water

cc: OEPA/SWDO/DSW Files

CC\bp