



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

May 28, 2013

Ms. Joy Scott  
Heroux Corp  
663 Montgomery Avenue  
Springfield, OH 45506

**RE: HDI Landing Gear, Springfield – NPDES No. 1GR01300\*DG/OHR000005  
Compliance Evaluation Inspection – Clark County**

Dear Ms. Scott:

On May 14, 2013, Sandra Leibfritz conducted an inspection at HDI Landing Gear located at 663 Montgomery Avenue, Springfield, Ohio. You and Mitch Moore were representing the facility. Details on the inspection may be found in the enclosed inspection report.

You asked if Ohio EPA's inspection forms may be modified to include site specific information. These forms may be modified by including additional information; however, you may not delete any information that is required in the forms. Also, your storm water pollution prevention plan (swp3) must include a section for sector-specific (i.e, Sector AB) requirements. You may add an Appendix towards the end of your swp3 to address this sector. This sector requires you to address precipitation or surface runoff from vents and stacks from metal processing and similar operations. If your operations do not have vents or stacks, then put "none" in this section.

You mentioned that typically there is not enough flow at the outfall to conduct a quarterly assessment. You will need to implement a log to demonstrate that during storm events you inspected the outfall and no sample could be obtained due to low or no flow conditions. You reported that you are the only one who currently checks the outfall and that you are not on-site during storm events in the late afternoon and evening hours when the storms seem to occur. It is our understanding that there is a second shift. You will need to train a person on second shift to collect and assess the sample or log an entry into the book that no sample could be collected and the reason why. You should also address safety issues when collecting your sample especially since the sample will be collected during inclement weather (e.g., rain event, snow etc.).

There are two catch basins that used to be located outside between the main building and the tool crib building and which drain to the storm sewer. This area was enclosed and the two catch basins are now located inside the building. These two catch basins must be plugged to prevent any spills from entering waters of the state. As discussed,

Ms. Joy Scott  
Heroux Corp  
May 28, 2013  
Page 2

you may achieve this by any of the following; cover the catch basins with diamond plate and seal around the edges, use a pipe plug, an end cap or equivalent to seal the pipe. Once completed, this area should continue to be inspected to ensure the integrity of the seal/plug is maintained.

No later than June 28, 2013, please inform this office, in writing, a description of the actions taken or proposed to address the 3 items mentioned above. Your response should include the dates, either actual or proposed, for completion of the actions.

If you should have any questions about the inspection, please call Ms. Leibfritz at (937) 285-6104 or me at (937) 285-6034.

Sincerely,



Martyn G. Burt  
Environmental Supervisor  
Division of Surface Water

MB/kb

cc: Clark County Health Department



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

### Industrial Storm Water Compliance Evaluation Inspection

Name of facility; **Heroux Devtex Corp**  
Address; **663 Montgomery Avenue  
Springfield, OH 45506**

Permit number; **1GR01300\*DG/OHR000005**      Applicable permit sector; **AB1**

Permit Effective date: **January 1, 2012**      Permit Expiration Date: **December 31, 2016**

Date of visit; **May 14, 2013**      Time started; **9:00 a.m.**      Time ended; **11:05 a.m.**

Facility representative(s); **Joy Scott (Environmental Officer) and Mitch Moore (Maintenance)**

OEPA inspector; **Sandra D. Leibfritz**

#### SWP3:

- A. Did the facility representative produce an SWP3? **Yes**
- A1. Did it include a site map? **Yes**
- A2. Did it include schedules and procedures for the quarterly routine facility inspections? **Yes. HDI Landing Gear performs monthly inspections as required by their corporate office.**
- A3. Did it include schedules and procedures for the comprehensive annual facility inspection? **Yes, the comprehensive annual inspection will be done in June, 2013 when their environmental audit is conducted by their corporate office.**
- A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges? **Yes. A quarterly visual assessment has not been completed. Ms. Scott reported that whenever she checks the outfall there is not enough flow to collect and assess the sample.**
- A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done? **NA**

Comments;

- **Heroux Devtex bought Eagle Tool in April 2012. Heroux Devtex applied for a storm water permit in 2012.**
- **There are approximately 105 employees,**
- **Heroux Devtex provides landing gear for commercial and military aircraft.**

Inspection records:

B. Were inspection records available? **Yes**

Site Observations:

C. Are materials stored exposed to weather? **Yes**

If Yes, list materials.

- Landing gear parts stored outside (no residual oil) – oxidation of parts occurring behind grinding area that is north of the main building.**
- Open dumpster with scrap metal (no residual oil) from industrial racks in the area to the south of the main building.**
- Open dumpster with cardboard in the area to the south of the main building. This dumpster should be covered.**
- Trash compactor in the area to the south of the main building.**

D. Are there any structural storm water management practices used onsite?

Examples include grassed swales, permeable pavement, inlet filters, detention ponds, engineered wetlands, mulch berms, silt fence and rain gardens. **Yes.**

- There is a storm water detention pond located to the west of the main building.**
- Scrap metal with oil residue is placed under cover (overhang/roof with sides and strip curtain) at the loading dock with a drip pan beneath it.**

E. Number of outfalls from site/number inspected:

- There are two pipes entering the detention pond and there is one outfall to an unnamed tributary of Mill Creek.**
- The detention pond was dry during the inspection.**
- There was no evidence of staining.**

G. Did any show evidence of pollutants discharged in the storm water? **No**

If yes, describe;

H. Other observations/comments;

**The facility's SIC code is 3728 (Aircraft Parts – Landing Gear).**

**The compressor blowdown discharges to an UST and is recycled by United Waste.**

**The machines are oil cooled and self-contained. Coolant is recycled by United Waste.**

**Bag filters (mist collectors) are drummed and picked up by United Waste.**