



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

February 10, 2009

Ms. Glenda Empsall
Goodrich Corporation
Aircraft Wheels & Brakes
P.O. Box 19210
Spokane, WA 99219-9210

RE: Final Decision: Variance from Washington State Dangerous Waste Regulations,
Chapter 173-303 WAC

Dear Ms. Empsall:

Ecology concluded the public review and comment period for the proposed decision to grant the Goodrich Corporation, Aircraft Wheels & Brakes Division ("Goodrich") at 11135 West Westbow Road, Spokane, Washington, a variance from the Washington State Dangerous Waste Regulations, Washington Administrative Code (WAC) Chapter 173-303. Comments received during the public comment period have been considered.

On a case-by-case basis, the Dangerous Waste Regulations allow Ecology to grant a variance from regulations that classify reclaimed materials as solid wastes when recycled. Goodrich has applied for a variance from the regulation for 'materials that are reclaimed but must be reclaimed further before the materials are completely recovered' under (WAC 173-303-017(5)(a)(iii)).

The variance is for liquid condensate containing hydrocarbons in the parts per million range. The condensate is a solid waste per the Dangerous Waste Regulations. The condensate is generated in the Chemical Vapor Deposition (CVD) process. After leaving the CVD process, the liquid condensate is reclaimed and then reused as boiler feed water.

Based on the information available, Ecology has decided to grant the variance to allow recycling of the liquid condensate under the following conditions:

1. The variance is case-specific, process-specific and site-specific for liquid condensate from current processes at the Spokane Goodrich facility, as described in the application information from Goodrich, dated March 14, 2008. This variance does not apply to any other business or industrial operation.
2. No other wastes, including those resulting from the reclaiming and conditioning process (such as, sludge, filters, etc.), or other waste streams (such as wash water, sump water, etc.) are included in this determination.
3. The variance may be re-evaluated or withdrawn if the information providing the basis for the determination changes, or if Ecology later determines that human health or the environment is threatened.



4. The variance does not exempt Goodrich from any other federal, state and/or local regulations and requirements.

People can challenge Ecology's final decision by appealing to the Pollution Controls Hearing Board. Appeal procedures are in WAC 173-303-845 and Chapter 43.21B Revised Code of Washington (RCW).

If you have any questions regarding this letter, please feel free to contact me at (509) 329-3409.

Sincerely,



Lisa Brown, P.E.

Section Manager, Eastern Regional Office

Hazardous Waste and Toxics Reduction Program

Cc: Tim Pelton, City of Spokane Pretreatment Coordinator
Scott Mallery, Ecology/WQP
Michael Le, EPA Region 10
April Westby, Spokane Regional Clean Air Agency