

Hazardous Waste Section  
File Room Document Transmittal Sheet

17

Your Name: Scott Ross  
EPA ID: NCR000143867  
Facility Name: Aircraft Painting & Interiors  
Document Group: Inspection/Investigation (I)  
Document Type: Correspondence (C)  
Description: Investigative cost calculation penalty sheets site map and tracking combined  
Date of Doc: 10/26/2007  
Author of Doc:

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**File Room Use Only**

NCR000143867

Date Recieved by File Room:

Month	Day	Year

Scanner's Initials:

Date Scanned:

## INVESTIGATIVE COST CALCULATIONS

Aircraft Painting & Interiors, LLC  
NCR000143867

<b>Time Spent</b> (time onsite, report, IANOV and Order prep): 23 hours		\$
<b>Mileage:</b>		
	43.8 miles @ \$0.26/mile (CEI, 4/10/07)	\$11.39
	43.8 miles @ \$0.26/mile (hand deliver IANOV, 5/10/07)	\$11.39
	43.8 miles @ \$0.26/mile (observe sampling, 8/2/07)	\$11.39
	43.8 miles @ \$0.26/mile (observe excavation/sampling)	\$11.39
<hr/>		
<b>Total</b>		\$

**Division of Waste Management  
Hazardous Waste Section  
Penalty Summary Worksheet #1**

**Facility Name:** Aircraft Painting & Interiors, LLC  
**EPA Id. Number:** NCR 000 143 867  
**Docket:**

**Regulation(s) Violated (continuing):** 40 CFR 262.11

**Site Information:**

Hazardous waste codes: D001, F002  
Toxicity of waste involved: ignitable, toxic  
Distance to residences: >1000 feet  
Number of people involved: 4 employees  
Is the regulatory program adversely affected: Yes  
Potable water sources: wells, municipal: Municipal

**15A NCAC 13B .0702 - Civil Penalty Standards:**

**Consider : (1) Nature of the violation and degree and extent of harm, including at least the following:**

- (i) **type of violation:** Failure to conducted a proper hazardous waste determination on waste paint chips/stripper, waste paint thinner, waste MEK wipes, and the wastewater from the stripping process.
- (ii) **type of waste involved:** Flammable liquids, toxic liquids
- (iii) **duration and gravity of the violation:** Unknown
- (iv) **cause: (whether resulting from a negligent, reckless or intentional act or omission):** Negligent
- (v) **potential effect on public health and the environment:** Yes.  
media for exposure: Air, direct contact  
human health effect: Respiratory, eyes, skin, kidney, liver, heart, CNS, blood  
environment effect: including other organisms:
- (vi) **effectiveness of responsive measures taken by the violator:**  
Violations are continuing.
- (vii) **damage to private property:** No.

Facility Name: Aircraft Painting & Interiors, LLC

EPA Id. Number: NCR 000 143 867

Docket:

(2) cost of rectifying any damage:

(3) previous record:

ASSESSMENT MATRIX		Degree of Deviation from Requirement		
		MAJOR	MODERATE	MINOR
Nature and Degree of Harm	MAJOR	\$20K-25k	\$15K-20k	\$11K-15k
	MODERATE	\$8k-11k	\$5k-8k	\$3k-5k
	MINOR	\$1,500-3,000	\$500-1,500	\$250-500

Value from Assessment Matrix = \$

+  
**Multi-Day/Event**  
 # of days/events x penalty = \$

+  
**Compliance History**  
 +10% per repeat violation = \$

Any other notations:

**Total penalty assessed = \$**

\_\_\_\_\_  
 Signature

Date

**Division of Waste Management  
Hazardous Waste Section  
Penalty Summary Worksheet #2**

**Facility Name:** Aircraft Painting & Interiors, LLC  
**EPA Id. Number:** NCR 000 143 867  
**Docket:**

**Regulation(s) Violated (continuing):** 15A NCAC 13A .0109(a)  
40 CFR 270.10 (a)(3)

**Site Information:**

Hazardous waste codes: D001, F002  
Toxicity of waste involved: ignitable, toxic  
Distance to residences: >1000 feet  
Number of people involved: 4 employees  
Is the regulatory program adversely affected: Yes  
Potable water sources: wells, municipal: Municipal

**15A NCAC 13B .0702 - Civil Penalty Standards:**

**Consider :** (1) **Nature of the violation and degree and extent of harm, including at least the following:**

- (i) **type of violation:** Failure to obtain a hazardous waste permit for the treatment, storage, and disposal of hazardous/solid waste at the facility. Failure to complete an application for a hazardous waste permit.
- (ii) **type of waste involved:** Flammable liquids, toxic liquids
- (iii) **duration and gravity of the violation:** Unknown
- (iv) **cause: (whether resulting from a negligent, reckless or intentional act or omission):** Negligent
- (v) **potential effect on public health and the environment:** Yes.  
media for exposure: Air, direct contact  
human health effect: Respiratory, eyes, skin, kidney, liver, heart, CNS, blood  
environment effect: including other organisms:
- (vi) **effectiveness of responsive measures taken by the violator:**  
Violations are continuing.
- (vii) **damage to private property:** No.

Facility Name: Aircraft Painting & Interiors, LLC  
 EPA Id. Number: NCR 000 143 867  
 Docket:

- (2) cost of rectifying any damage:
- (3) previous record:

ASSESSMENT MATRIX		Degree of Deviation from Requirement		
		MAJOR	MODERATE	MINOR
Nature and Degree of Harm	MAJOR	\$20K-25k	\$15K-20k	\$11K-15k
	MODERATE	\$8k-11k	\$5k-8k	\$3k-5k
	MINOR	\$1,500-3,000	\$500-1,500	\$250-500

Value from Assessment Matrix = \$

+  
**Multi-Day/Event**  
 # of days/events x penalty = \$

+  
**Compliance History**  
 +10% per repeat violation = \$

Any other notations:

**Total penalty assessed = \$**

\_\_\_\_\_  
 Signature

Date

**Division of Waste Management  
Hazardous Waste Section  
Penalty Summary Worksheet #2**

**Facility Name:** Aircraft Painting & Interiors, LLC  
**EPA Id. Number:** NCR 000 143 867  
**Docket:**

**Regulation(s) Violated (continuing):** 15A NCAC 13A .0109(a)  
40 CFR 270.10 (a)(3)

**Site Information:**

Hazardous waste codes: D001, F002  
Toxicity of waste involved: ignitable, toxic  
Distance to residences: >1000 feet  
Number of people involved: 4 employees  
Is the regulatory program adversely affected: Yes  
Potable water sources: wells, municipal: Municipal

**15A NCAC 13B .0702 - Civil Penalty Standards:**

**Consider : (1) Nature of the violation and degree and extent of harm, including at least the following:**

- (i) **type of violation:** Failure to obtain a hazardous waste permit for the treatment, storage, and disposal of hazardous/solid waste at the facility. Failure to complete an application for a hazardous waste permit.
- (ii) **type of waste involved:** Flammable liquids, toxic liquids
- (iii) **duration and gravity of the violation:** Unknown
- (iv) **cause: (whether resulting from a negligent, reckless or intentional act or omission):** Negligent
- (v) **potential effect on public health and the environment:** Yes.  
media for exposure: Air, direct contact  
human health effect: Respiratory, eyes, skin, kidney, liver, heart, CNS, blood  
environment effect: including other organisms:
- (vi) **effectiveness of responsive measures taken by the violator:**  
Violations are continuing.
- (vii) **damage to private property:** No.

Facility Name: Aircraft Painting & Interiors, LLC  
 EPA Id. Number: NCR 000 143 867  
 Docket:

- (2) cost of rectifying any damage:
- (3) previous record:

ASSESSMENT MATRIX		Degree of Deviation from Requirement		
		MAJOR	MODERATE	MINOR
Nature and Degree of Harm	MAJOR	\$20K-25k	\$15K-20k	\$11K-15k
	MODERATE	\$8k-11k	\$5k-8k	\$3k-5k
	MINOR	\$1,500-3,000	\$500-1,500	\$250-500

Value from Assessment Matrix = \$

+  
**Multi-Day/Event**  
 # of days/events x penalty = \$

+  
**Compliance History**  
 +10% per repeat violation = \$

Any other notations:

**Total penalty assessed = \$**

\_\_\_\_\_  
 Signature

Date

**Division of Waste Management  
Hazardous Waste Section  
Penalty Summary Worksheet #4**

**Facility Name:** Aircraft Painting & Interiors, LLC  
**EPA Id. Number:** NCR 000 143 867  
**Docket:**

**Regulation(s) Violated (continuing):** 40 CFR 262.34 (c)(1)  
40 CFR 262.34 (c)(1)(i) – 40 CFR 265.173 (a)  
40 CFR 262.34 (c)(1)(ii)

**Site Information:**

Hazardous waste codes: D001, F002  
Toxicity of waste involved: ignitable, toxic  
Distance to residences: >1000 feet  
Number of people involved: 4 employees  
Is the regulatory program adversely affected: Yes  
Potable water sources: wells, municipal: Municipal

**15A NCAC 13B .0702 - Civil Penalty Standards:**

**Consider : (1) Nature of the violation and degree and extent of harm, including at least the following:**

- (i) **type of violation:** Failure to place waste in containers, failure to close and label containers.
- (ii) **type of waste involved:** Flammable liquids, toxic liquids
- (iii) **duration and gravity of the violation:** Unknown
- (iv) **cause: (whether resulting from a negligent, reckless or intentional act or omission):** Negligent
- (v) **potential effect on public health and the environment:** Yes.  
media for exposure: Air, direct contact  
human health effect: Respiratory, eyes, skin, kidney, liver, heart, CNS, blood  
environment effect: including other organisms:
- (vi) **effectiveness of responsive measures taken by the violator:**  
Violations are continuing.
- (vii) **damage to private property:** No.

Facility Name: Aircraft Painting & Interiors, LLC  
 EPA Id. Number: NCR 000 143 867  
 Docket:

- (2) cost of rectifying any damage:
- (3) previous record:

ASSESSMENT MATRIX		Degree of Deviation from Requirement		
		MAJOR	MODERATE	MINOR
Nature and Degree of Harm	MAJOR	\$20K-25k	\$15K-20k	\$11K-15k
	MODERATE	\$8k-11k	\$5k-8k	\$3k-5k
	MINOR	\$1,500-3,000	\$500-1,500	\$250-500

Value from Assessment Matrix = \$

+  
**Multi-Day/Event**  
 # of days/events x penalty = \$

+  
**Compliance History**  
 +10% per repeat violation = \$

Any other notations:

**Total penalty assessed = \$**

\_\_\_\_\_  
 Signature

Date

**Division of Waste Management  
Hazardous Waste Section  
Penalty Summary Worksheet #5**

**Facility Name:** Aircraft Painting & Interiors, LLC  
**EPA Id. Number:** NCR 000 143 867  
**Docket:**

**Regulation(s) Violated (continuing):** 40 CFR 262.34 (d)(2) – 40 CFR 265.173 (a)  
40 CFR 262.34 (d)(4) – 40 CFR 262.34 (a)(2)  
40 CFR 262.34 (d)(4) - 40 CFR 262.34 (a)(3)  
40 CFR 262.34 (d)(4) – 40 CFR 265.31  
40 CFR 262.34 (d)(4) – 40 CFR 265.37  
40 CFR 262.34 (d)(5)(ii)  
40 CFR 262.34 (d)(5)(iii)

**Site Information:**

Hazardous waste codes: D001, F002  
Toxicity of waste involved: ignitable, toxic  
Distance to residences: >1000 feet  
Number of people involved: 4 employees  
Is the regulatory program adversely affected: Yes  
Potable water sources: wells, municipal: Municipal

**15A NCAC 13B .0702 - Civil Penalty Standards:**

**Consider : (1) Nature of the violation and degree and extent of harm, including at least the following:**

- (i) **type of violation:** Failure to properly close storage containers, failure to date storage containers, failure to label storage containers, failure to minimize the possibility of a hazardous waste release, failure to make emergency arrangements with local authorities, failure to develop and post a SQG contingency plan, failure to properly train employees.
- (ii) **type of waste involved:** Flammable liquids, toxic liquids
- (iii) **duration and gravity of the violation:** Unknown
- (iv) **cause: (whether resulting from a negligent, reckless or intentional act or omission):** Negligent
- (v) **potential effect on public health and the environment:** Yes.  
media for exposure: Air, direct contact  
human health effect: Respiratory, eyes, skin, kidney, liver, heart, CNS, blood  
environment effect: including other organisms:
- (vi) **effectiveness of responsive measures taken by the violator:**  
Violations are continuing.
- (vii) **damage to private property:** No.

Facility Name: Aircraft Painting & Interiors, LLC

EPA Id. Number: NCR 000 143 867

Docket:

(2) cost of rectifying any damage:

(3) previous record:

ASSESSMENT MATRIX		Degree of Deviation from Requirement		
		MAJOR	MODERATE	MINOR
Nature and Degree of Harm	MAJOR	\$20K-25k	\$15K-20k	\$11K-15k
	MODERATE	\$8k-11k	\$5k-8k	\$3k-5k
	MINOR	\$1,500-3,000	\$500-1,500	\$250-500

Value from Assessment Matrix = \$

+  
**Multi-Day/Event**  
 # of days/events x penalty = \$

+  
**Compliance History**  
 +10% per repeat violation = \$

Any other notations:

**Total penalty assessed = \$**

\_\_\_\_\_  
 Signature

Date

**Division of Waste Management  
Hazardous Waste Section  
Penalty Summary Worksheet #5**

**Facility Name:** Aircraft Painting & Interiors, LLC  
**EPA Id. Number:** NCR 000 143 867  
**Docket:**

**Regulation(s) Violated (continuing):** 40 CFR 262.34 (d)(2) – 40 CFR 265.173 (a)

**Site Information:**

Hazardous waste codes: D001, F002  
Toxicity of waste involved: ignitable, toxic  
Distance to residences: >1000 feet  
Number of people involved: 4 employees  
Is the regulatory program adversely affected: Yes  
Potable water sources: wells, municipal: Municipal

**15A NCAC 13B .0702 - Civil Penalty Standards:**

**Consider : (1) Nature of the violation and degree and extent of harm, including at least the following:**

- (i) **type of violation:** Failure to properly close storage containers.
- (ii) **type of waste involved:** Flammable liquids, toxic liquids
- (iii) **duration and gravity of the violation:** Unknown
- (iv) **cause: (whether resulting from a negligent, reckless or intentional act or omission):** Negligent
- (v) **potential effect on public health and the environment:** Yes.  
media for exposure: Air, direct contact  
human health effect: Respiratory, eyes, skin, kidney, liver, heart, CNS, blood  
environment effect: including other organisms:
- (vi) **effectiveness of responsive measures taken by the violator:**  
Violations are continuing.
- (vii) **damage to private property:** No.

Facility Name: Aircraft Painting & Interiors, LLC

EPA Id. Number: NCR 000 143 867

Docket:

(2) cost of rectifying any damage:

(3) previous record:

ASSESSMENT MATRIX		Degree of Deviation from Requirement		
		MAJOR	MODERATE	MINOR
Nature and Degree of Harm	MAJOR	\$20K-25k	\$15K-20k	\$11K-15k
	MODERATE	\$8k-11k	\$5k-8k	\$3k-5k
	MINOR	\$1,500-3,000	\$500-1,500	\$250-500

Value from Assessment Matrix = \$

+  
**Multi-Day/Event**  
 # of days/events x penalty = \$

+  
**Compliance History**  
 +10% per repeat violation = \$

Any other notations:

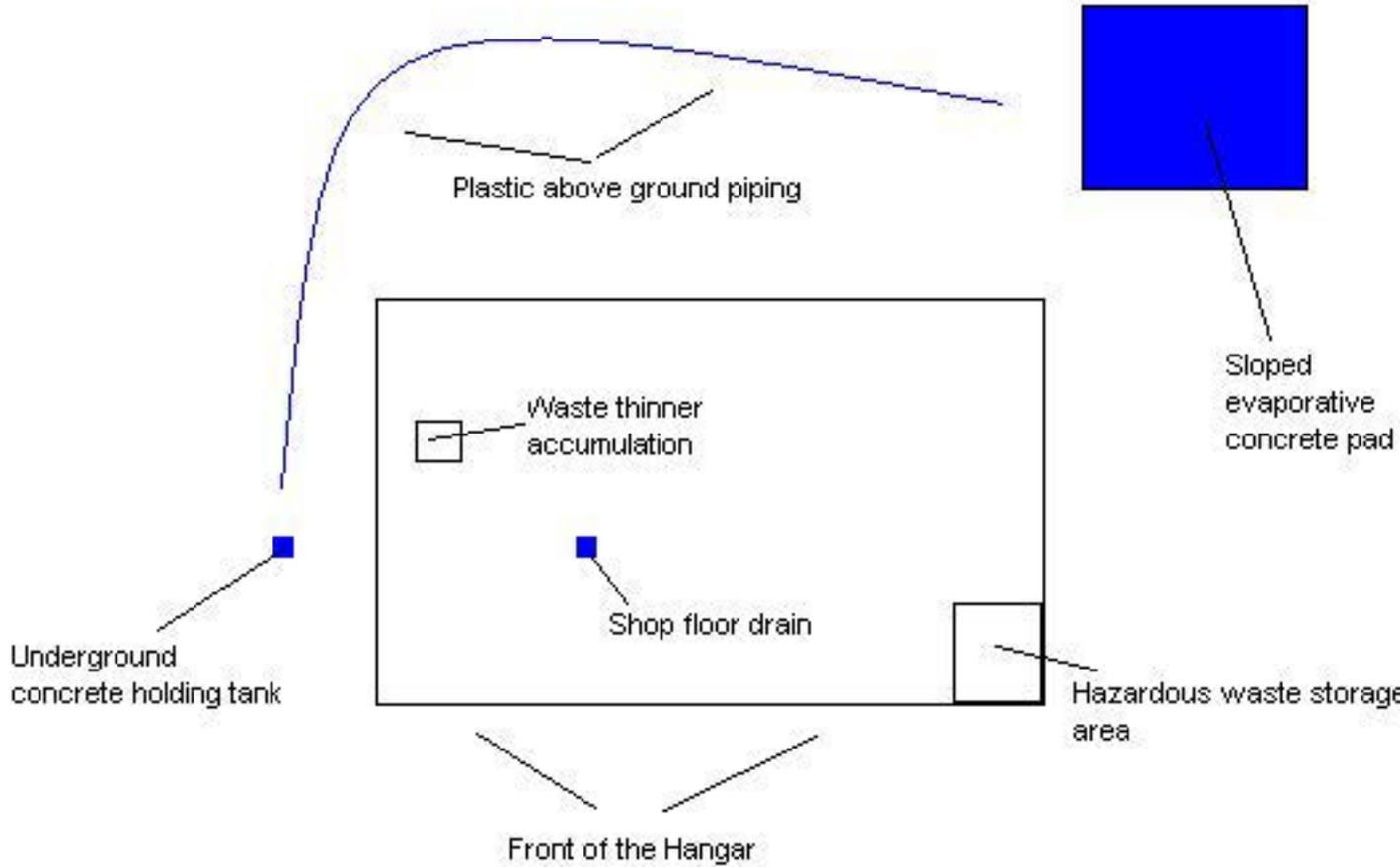
**Total penalty assessed = \$**

\_\_\_\_\_  
 Signature

Date

AIRCRAFT PAINTING & INTERIORS, LLC  
3680 AIRPORT LOOP  
SALISBURY, NC 28147

Airport Loop Road



Airport Runway

## ORDER ROUTING - ENFORCEMENT

**Company Name:** Aircraft Painting & Interiors, LLC

**EPA ID #:** NCR 000 143 867      **Site Location:** 3680 Airport Loop Road, Salisbury, NC 28147,  
Rowan County

**Action Type:** Recommend Standard Compliance Order

**Inspector:** Sean Morris                      **Order Developed by:** \_\_\_\_\_

**Date Sent to Programs Branch:** \_\_\_\_\_      **Date Received:** \_\_\_\_\_

CEI INSPECTION DATE	TARGET DATE
April 10, 2007	

### ORDER REVIEW

Name	Date Sent	Date Due	Date Returned

**Attachments:**                Inspection Report                                  Penalty Summary Worksheet  
                           \_\_\_\_\_ EPA Inspection Report                      \_\_\_\_\_ Analyses  
                           \_\_\_\_\_ Investigation Report                                  Photos  
                           \_\_\_\_\_ Penalty Checklist                                          Disk

**Comments:**

**cc:**      **E/W/RI Supervisor: Brent Burch**                      **WMS: Sean Morris**