

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Scott Ross
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**NC DEPT OF ENVIRONMENT & NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION**

RCRA INSPECTION REPORT

1. **Facility Information:** Aircraft Painting & Interiors, LLC
3680 Airport Loop
Salisbury, NC 28147
2. **Facility Contact:** Mr. Ken Silverman, Part Owner
3. **Survey Participants:** Mr. Ken Silverman
Mr. Sean Morris, Senior Environmental Specialist
4. **Date of Inspection:** April 10, 2007

Date of Report: April 11, 2007
5. **Purpose of Inspection:** To determine compliance with 40 CFR 260-279.
6. **Facility Description:**

A complaint was received on January 11, 2007 regarding the disposal of waste paint chips being disposed of behind the NAPA Autocare Center located at 889 River Hwy, Mooresville, NC. That complaint was investigated and a small pile of waste paint chips was discovered behind the facility. The owner of the NAPA center is Mr. Ken Silverman. Mr. Silverman stated that he is the part owner of Aircraft Painting & Interiors, LLC located at the Rowan County Airport in Salisbury, NC. Mr. Silverman believed that a former employee dumped the paint chips behind the NAPA store after or just before being terminated.

On April 10, 2007 an inspection was conducted at Aircraft Painting & Interiors. I met with Mr. Silverman at the time of the inspection. The facility operates one aircraft hangar at the Rowan County Airport and conducts plane paint stripping, priming, and painting services. The facility has been in operation for 2 ½ years and the hangar is 7,400 square feet in size. All painting operations are conducted within the aircraft hangar. There are 3-4 employees working at the facility. The painting operation generates waste paint chips, waste paint thinner, and waste MEK contaminated wipes. The facility has accumulated all the waste generated over the past 2½ years onsite. Employees wear respirators during the painting process.

The paint stripping process starts with applying a methylene chloride based stripper to the outside of aircraft. The stripper material is a gel that sticks to the outside surfaces of the plane. The stripper peels the paint from the aircraft. The concrete floor of the hangar is sprayed with water prior to applying the stripper. After the paint has been

removed the majority of paint chips are swept up and placed in 5-gallon containers. The floor is then cleaned with water. The wastewater collects in the shop floor drain and is pumped to an outside underground concrete tank. The tank is approximately 50-gallons in size. The wastewater is then pumped, via above ground piping, to the sloped concrete pad. The wastewater is continuously circulated over the surface of the pad until all liquid has evaporated. The waste paint chips are carried to the outside pad and placed in a metal tray where the liquid is evaporated and the chips are then placed in 55-gallon containers. There were (3) 5-gallon containers of waste paint chips/stripper located inside the hangar area and there were (2½) 55-gallon containers located in the facility's waste storage area. The containers were not labeled or dated and several of the containers were open at the time of the inspection. The (3) 5-gallon containers of waste paint chips/stripper were observed to be leaking onto the hangar concrete floor at the time of the inspection. The containers are designed to leak so that the liquid material evaporates once on the concrete floor. The wastewater evaporative process may constitute as hazardous waste disposal and treatment and the facility does not have a permit. Based on the properties of methylene chloride, soil contamination may have occurred from the stripper material leaching through the concrete hangar floor, concrete underground tank and ancillary equipment, and through the sloped concrete evaporative pad (see deficiency section).

The facility also generates waste paint thinner from the painting operation. The thinner is a toluene and methanol based solvent. There was one 55-gallon container of waste thinner in the paint mixing area. The container was not properly labeled and the containers funnel was open. There were also spills of thinner waste on the outside of the funnel. There were (5) 55-gallon containers and (1) 2½-gallon container of waste thinner located in the facility's waste storage area. The containers were not properly labeled or dated and several of the containers were not properly closed. Waste solvent wipes are generated when an MEK based solvent is applied to the surface of aircraft, prior to priming. The waste MEK wipes are disposed as solid waste (see deficiency section).

* **Digital photos were taken to document violations. Copies of the facility's MSDS for paint stripper, paint thinner, and MEK solvent were obtained at the time of the inspection. An "8700-12 Notification of Regulated Waste Activity" form was left with Mr. Silverman at the time of the inspection. An example weekly inspection document and emergency arrangement letter was also provided.**

7. **Waste Type:**

Waste paint chips/stripper
Waste paint thinner
Waste MEK wipes

8. Site Deficiencies:

- **15A NCAC 13A .0109(a)** - Aircraft Painting & Interiors, LLC is in violation of this regulation in that the facility has treated, stored, and disposed of a hazardous/solid waste and the facility does not have a permit.
- **40 CFR 262.11** – Aircraft Painting & Interiors, LLC is in violation of this regulation in that the facility has not conducted a proper hazardous waste determination on waste paint chips/stripper, waste paint thinner, waste MEK wipes, or the wastewater from the stripping process.

*** Above violations were addressed on an Immediate Action Notice of Violation.**

9. Reminders:

- Once the facility returns to operation a generator status determination must be made. If the facility generates more than 220-pounds of hazardous waste during any calendar month the facility must notify as a small quantity generator and comply with all applicable requirements.

INSPECTOR (DATE)

(SENT BY CERTIFIED MAIL)
FACILITY CONTACT

cc:
MRO Files
Western Area Compliance Supervisor
Central Office Files
Ken Silverman, Aircraft Painting & Interiors, LLC

