



State of Ohio Environmental Protection Agency

Southeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

May 9, 2007

**HARRISON COUNTY
GENERAL FILE
(DIAL EASTERN STATES
AIRCRAFT PAINTING, INC.)
DHWM/SEDO
OHD987018538**

Mr. Richard Guenther
Dial Eastern States Aircraft Painting Inc.
P.O. Box 106
Cadiz, Ohio 43907

Dear Mr. Guenther:

On August 14, 2006, I inspected the Dial Eastern States Aircraft Painting, Inc. (Dial Eastern) to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). This letter will explain the violations or compliance issues I found and what you need to do to correct them.

Based on this inspection, a Notice of Violation (NOV) letter was issued to you on August 15, 2006. To date, I have not received a response. Another NOV was issued to you on September 21, 2006. We spoke by telephone that same day and you indicated you would have the requested sampling performed in the next two weeks. In October, 2006, I contacted you regarding scheduling a date for sampling and you stated that your facility planned to cease using the methylene chloride (MC)-stripper. On February 5, 2007, I returned to your facility to observe stripping operations and you explained that the MC stripper is now used only for paint remaining after benzyl alcohol and/or hydrogen peroxide strippers are used. This has been approximately one to four gallons of MC stripper per plane. I spoke with you by telephone on May 9, 2007 and you agreed to use two gallons of the MC stripper on the next plane and would collect a water sample from the collection sump immediately after stripping has been completed. You stated that you would provide the sampling data as soon as you receive it from your consultant/testing lab.

Until I receive this documentation, Dial Eastern remains in violation of the following regulation:

- (1) **OAC Rule 3745-52-11, Hazardous Waste Determination:** Any person who generates a waste in the State of Ohio shall determine if that waste is a hazardous waste using the following method: first determine if the waste is excluded from regulation under OAC Rule 3745-51-04, then determine if the waste is listed as a hazardous waste in OAC Rule 3745-51-30 to -35, and then determine if the waste is identified in OAC Rule 3745-51-20 to-24 by testing the waste using the methods in OAC Rule 3745-51-20 to -24 or by applying knowledge of the waste.

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Dial Eastern strips and repaints fixed-wing aircraft in a hangar at the Harrison County airport. Depending on the paint on the aircraft, the stripping solution will either be hydrogen peroxide or a methylene chloride-based product (73000 Zip-Strip Industrial Remover). The solution is applied the aircraft and later rinsed off, the rinse water is collected in a floor sump, pumped into a 250-gallon tank and then treated in a wastewater treatment unit (solids are filtered out and then it passes through an air-stripping column) and the effluent is discharge to a drainage swale at the rear of the hangar. To demonstrate that this rinse water is not a hazardous waste, Dial Eastern must collect a representative samples of this rinse water (for the MC stripping product) as soon as it is collected in the sump and provide a copy of the results, for total volatile organic compounds (SW 846 method 8260), to this office for review.

Should you have any questions, please feel free to call me at (740) 380-5278. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Rich Stewart
District Representative
Division of Hazardous Waste Management

RS/mlm

cc: Dan Messerly, DSW-SEDO
Steve Alspach, DAPC-SEDO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.