



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

July 2, 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.

Please provide the information requested below within 30 days of your receipt of this letter.

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.

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 approximately once every two weeks (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. You collected a grab sample of the rinseate from the floor sump and faxed the results to me on May 31,

Mr. Richard Guenther  
July 2, 2007  
Page 2

2007. These results indicate that methylene chloride (MC) remains in the rinsewater at approximately 240 ppm. Unfortunately, Ohio is not yet authorized to use direct sample results to determine whether a wastewater is a hazardous waste. The evaluation must instead be based on the following calculation: the maximum total weekly usage of the solvents divided by the average weekly flow of wastewater into the facility's wastewater treatment or pretreatment system. If this number is greater than 25 ppm for MC, it is a hazardous waste. If you need help with this calculation, please call me at (740) 380-5278.

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

**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.