



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Central District Office

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 728-3778 FAX: (614) 726-3698
www.epa.state.oh.us

P.O. Box 1049
Columbus, OH 43216-1049

May 12, 2008

Mr. Walter Raleigh
Air Tahoma
Building 597, Rickenbacker International Airport
Columbus, OH 43217

Re: **Air Tahoma (complaint investigation)**
Non-notifier, Franklin County

Dear Mr. Raleigh:

Thank you and to Mr. Brady for your assistance during my inspection at your facility at Building 597 at the Rickenbacker Airport on April 10, 2008. Ohio EPA had received a complaint (#3391) regarding your facility. Ohio's laws under Chapter 3745 of the Ohio Administrative Code and Chapter 3734 of the Ohio Revised Code establish a system for safe and responsible management of hazardous waste and used oil. This letter summarizes my findings.

Two violations were noted:

1. **Hazardous Waste Evaluation, OAC rule 3745-52-11:** Wastes which are generated, must be adequately evaluated according to steps set forth in this chapter, to determine if they may be hazardous waste.

The following potential hazardous wastes had not yet been adequately evaluated:

- Solid residues and sludge from the aircraft paint stripping operations, which may fail the TCLP test for leachable heavy metals.
- Solid or liquid wastes from the alodining process which may contain Chromium (VI), a TCLP heavy metal constituent.

Please ensure that all potential hazardous wastes are properly evaluated by testing if necessary, and advise me of the specific results of your determination with regard to the above mentioned wastes.

2. **Used Oil Container and Tank Marking, OAC rule 3745-279-22(C):** Containers and tanks of used oil must be clearly labeled or marked, "Used Oil".

Five 55-gallon drums of used oil inside the main building, and two 55-gallon drums of used oil inside a "dog house" shed next to the main building, lacked the required marking as "used oil".

Please provide proper labeling/marketing of the drums and send photos showing that you have corrected this problem.

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

In addition to the above-noted violations, the following comments are also offered:

- ▶ During my visit we discussed the plumbing of the floor drains inside the building. For your general information, I later incidentally learned during a conversation with Paul Kennedy of the Regional Airport Authority, that the drains are believed to be properly plumbed to the sanitary sewer.
- ▶ There were two drums (each strapped onto two pallets) that were being used as ballast to keep an airplane outside from rolling in the wind. The drums appeared to contain oily water. You indicated that they will be replaced with drums of clean water.
- ▶ The older aircraft parked outside the building, had engines of a type known to drip and leak oil. Spill containment trays with a hydrophobic (non-water absorbent) pad material, are recommended for placement underneath these sources of stormwater pollution, in order to prevent runoff of oil contaminated water from the site.
- ▶ For internal tracking purposes only at this time, Ohio EPA is assigning a Hazardous Waste identification number to your facility location.
- ▶ I have enclosed some more information about obtaining a generator ID number which may be needed soon if regulated amounts of hazardous waste are generated from the alodining operations that are planned in the near future. Small Quantity Generators have 180 days from the time of generation, to ship their hazardous wastes to a permitted Treatment, Storage and/or Disposal (TSD) facility. Related guidance on that is also enclosed.

I look forward to receiving a response from you within 30 days with the above requested return-to-compliance information. If you have any questions, do not hesitate to call me at (614) 728-3885.

Sincerely,



J. David Hohmann
Division of Hazardous Waste Management
Central District Office
Environmental Specialist

c: Tammy McConnell, DHWM/CO
Paul Kennedy, CRAA
CDO File

JDH/nsm Air Tahoma NOV

Notice: Ohio EPA's failure to list specific deficiencies/violations in this letter does not relieve your company from general obligations to comply with all applicable regulations.

USED OIL INSPECTION CHECKLIST FOR GENERATORS + COLLECTION CENTERS & AGGREGATION POINTS

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? Yes No N/A
If yes: [N/A]
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes No N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? *RMK: No burning for energy recovery was being done on site.* Yes No N/A

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so [N/A] Yes No N/A
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes No N/A
6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes No N/A
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked as "Used Oil"? [3745-279-22(C)] Yes No N/A
RMK: Five drums inside the building and 2 drums in a "dog house" shed outside lacked marking as "Used Oil".
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
RMK: Incidental drippage of oil from a parked plane's engines onto the pavement were noted. Accumulation of generated used oil was being done in areas with secondary containment to prevent releases to the environment. Supplies in the shop included granular absorbent spill cleanup material.
- a. Stopped the release? Yes No N/A
- b. Contained the release? Yes No N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A

ON-SITE BURNING IN SPACE HEATER [N/A]

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes No N/A
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A

GENERATOR TRANSPORTATION [N/A]

COLLECTION CENTERS AND AGGREGATION POINTS [N/A]

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

Safety Equipment Used: Safety glasses, steel toed boots

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A
Alodine waste needed to be evaluated for TCLP chromium hazardous characteristics. Paint stripping sludge needed to be evaluated for possible TCLP metals characteristics.

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. (approximately 25-30 gallons) of hazardous waste per month? or < 1 Kg. of acutely hazardous waste? Yes No N/A

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes No N/A

TREATMENT OF HAZARDOUS WASTE [N/A]

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: *Air Tahoma, Inc.* **Facility Type:** CESQG, Used Oil generator **Date of Inspection:** 4/10/08 **EPA ID#:** unassigned

Description of Waste			On- or Off-Site Management		P2 Activities		
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc) and EPA Waste Code	QTY Generated per month; Type of accumulation (container, tank) & location	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility. (EPA ID # of Off-site facility?)	Current P2 Activities	P2 Opportunities	
1	Conversion coating of aluminum aircraft	Alodine contaminated wastes	Over 30 gallon batch likely in the near future. Prior to this, very small amounts.	N/A	To be determined		
2	Parts cleaning	Spent naphtha solvent	35 gallons per batch from two parts cleaner units	N/A	Crystal Clean (??) reuse as a roof lapping compound ingredient	N/A Will send info on adding a filter (comic book guidance)	Sent the new parts-washer handbook with info on this topic.
3	Oil and fuel spill cleanup	Spent absorbent materials	20-50 lbs./month	N/A	Central Ohio Waste Oil takes (not clear if recycled or disposed by them)		N/A
4	Other maintenance activities	Used oil	7 drums on site. Generation rate varies	N/A	Central Ohio Waste Oil takes.		
5	Paint stripping activities	Paint residues (mostly dry), not evaluated for hazardous characteristics	Variable. Up to estimated 4-5 drums from one plane.	N/A	Disposed to solid waste dumpster		

REMARKS-GENERAL INFORMATION

General Process Information; Regulatory/Enforcement History, additional P2 remarks and information: See narrative Report.

Would this facility be interested in a P2 assessment? **No**

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html