

RCRA Compliance Branch INSPECTION REPORT

Inspection Date(s):	8/24/2023	Inspection Announced: No
Facility or Site Name:	AAR Aircraft Component Services	
Facility/Site Physical Location:	747 Zeckendorf Boulevard	
(City, state, zip code)	Garden City, NY 11530	
Mailing address (if different from above):		
Facility/Site Contact:	Anthony J. Sorrentino	Facilities/EHS Specialist, Lead Senior Machinist, Manager Environmental, Health, Safety, Medical and Training
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RCRA ID Number:	NYD077508091	
Facility/Site Personnel Participating in Inspection:		
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Inspector:		
Areeba Khan	AREEBA KHAN	Digitally signed by AREEBA KHAN Date: 2023.11.01 13:43:15 -04'00'
Supervisor:		
Derval Thomas	DERVAL THOMAS	Digitally signed by Derval THOMAS Date: 2023.10.31 16:44:23 -04'00'

SECTION I – INTRODUCTION

Purpose of the Inspection Objective

The purpose of the inspection was to perform a Resource Conservation and Recovery Act (RCRA) comprehensive evaluation inspection (CEI) at this facility. The inspection was conducted by EPA RCRA inspector Areeba Khan.

Opening Conference

EPA Region 2 RCRA inspector Areeba Khan arrived at AAR Aircraft Component Services on August 24, 2023, for an unannounced inspection. I walked into the reception area of the lobby. I was greeted by an employee on his way into work. The employee stated that he will call the health and safety manager to meet me in the lobby. A few minutes later, I met with Alvin Addison the Director of Quality Compliance and Safety, Lawrence Montreuil, Vice President of Business Development, and Anthony J. Sorrentino the Facilities/EHS Specialist. I presented my credentials to Mr. Addison, Mr. Montreuil and Mr. Sorrentino and informed them that this was an EPA inspection to determine the facility's compliance with RCRA regulations. The scope of the inspection was to conduct a compliance evaluation inspection (CEI).

Facility/Site Description

AAR Aircraft Component Services is an aviation services provider located in Garden City, NY. AAR Aircraft Component Services repairs and overhauls airplane parts and craft components. The facility also does military contract work for the Department of Defense. The facility has two central storage areas and eight satellite accumulation areas. The facility generates both hazardous and nonhazardous waste from the following: hydro oil, oil water, alcohol waste, paint thinner, media dust, sludge, and a water evaporator. The sludge and water evaporator waste is in a closed loop system. AAR Aircraft Component Services has a contract with Crystal Clean as their transporter and consultant. Mr. Sorrentino explained that the facility provides Crystal Clean with safety data sheets for them to do a hazard waste determination. Every six weeks Crystal Clean comes to pick up all their waste, hazardous and non-hazardous. The facility also generates used oil and universal waste from general upkeep.

After review of the manifest information and statements made by the facility representatives, the facility was determined to be a Small Quantity Generator (SQG) of hazardous waste at the time of the inspection. The hours of operation are Monday through Friday 6:30 am to 6:30 pm. AAR Aircraft Component Services employs 130 people.

SECTION II – OBSERVATIONS

Bulk Storage Waste Storage (CSA)

The facility representatives guided me outside of the main building to where the central storage area was located. The central storage area was located outside in a fenced area. There was a fire extinguisher present, and a sign labeled hazardous waste storage area/product storage area. Mr. Sorrentino explained that this area is also where they keep their products drums. At the time of the inspection there was no list of emergency phone numbers. There was one 55 gallon drum

dated, closed and labeled. Mr. Sorrentino explained that Crystal Clean do hazard waste determinations of their wastes.

Skydrol Only (SAA)

The facility representatives then proceeded to show me the skydrol area. The facility representatives stated the skydrol area generates caustic, flammable liquid. At the time of the inspection, the following was observed:

- One 55 gallon hazardous (skydrol 500 B4) satellite accumulation container that was in secondary containment. At the time inspection, there was no hazardous waste labeled and the drum had a funnel with no gasket. The satellite accumulation container had a spill in the front. The container was in the secondary containment.

Fuel Accumulation Area (SAA):

The facility representatives stated the fuel accumulation area is where the facility test the calibration fluid components. The employees check to see what parts of the plane they need to replace and if the fuel needs to be changed out. The waste from the tests of the petroleum distillation goes into a 55 gallon drum. At the time of the inspection there was one 55 gallon drum of hazardous waste in the satellite accumulation area that had a funnel with no gasket, placard, in secondary containment and was labeled.

Paint Shop

The facility representatives stated that the paint shop is where the facility paints airplane parts. Mr. Sorrentino explained that any by-products from the paint shop goes into the 55 gallon drums. At the time of the inspection the following were observed:

- One 55 gallon drum of hazardous waste (paint thinner) that had a funnel with no gasket, placard and was labeled.
- One 55 gallon drum of hazardous waste (alcohol) that had a funnel with no gasket, placard and was labeled.
- One 55 gallon drum of hazardous waste (aerosol) that was not labeled.
- The facility representatives stated the empty aerosol cans are disposed of in the garbage.

Dry Media Waste Area

The facility representatives stated the dry media area generates plastic, media blast, and glass waste. Mr. Sorrentino explained the hazardous waste determination is made by Crystal Clean. At the time of the inspection there was one 55 gallon drum container closed, labeled with the hazardous waste label.

Used Oil

The facility representatives then proceeded to show me the used oil area. At the time of the inspection the following were observed:

- One 35-gallon drum of waste rags that was closed, labeled (no HW label) and in secondary containment.
- One 55-gallon drum of used oil that had a funnel with no gasket therefore it was not closed and in secondary containment.

Engineering Cage:

Mr. Sorrentino explained the engineering cage is where they keep their universal waste as well as tools used by the employees. At the time of the inspection, the following were observed:

- Two 5 gallon container that were empty, open, labeled, and dated with the year 2015 but both facility representatives stated it should be 2023.
- One 5 gallon container that contained alkaline batteries that was labeled and dated with the year 2015 but both facility representatives stated it should be 2023.
- One 5 gallon container that contained nickel batteries that was open, labeled, and dated with the year 2015 but both facility representatives stated it should be 2023.
- One 55 gallon drum of absorbant material that was closed and labeled.

General Shop

The general shop contained generator parts that need to be cleaned. The cleaning of the parts is being done by Crystal Clean as part of their contract agreement. At the time of the inspection, there were three parts washers that were all closed.

General Floor Shop

Mr. Sorrentino then showed and explained to me that there was another parts washer on the general floor shop of the facility.

Records Review

- Basic Plan

At the time of the inspection, there was a plan in place.

- Manifests and Land Disposal Restrictions

At the time of the inspection, there were manifests record on site.

- Personnel Training

At the time of the inspection, there was documentation of personnel training.

- Arrangement with Local Authority

At the time of the inspection, the facility had made arrangement with local authorities.

SECTION III – AREAS OF CONCERN

Regulatory Concerns

1. Pursuant to 6 NYCRR § 373-3.9(d)(1), management of containers. (1) A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.
 - a. At the time of the inspection, there was one 55 gallon drum containing hazardous waste (skydrol 500 B4) located in the skydrol area that had a funnel but there was no gasket, therefore it was not closed. After the inspection, Mr. Sorrentino provided proof to inspector Khan showing that the violation was corrected.
 - b. At the time of the inspection, there was one 55 gallon drum containing hazardous waste located in the fuel accumulation area that had a funnel but there was no gasket, therefore it was not closed. After the inspection, Mr. Sorrentino provided proof to inspector Khan showing that the violation was corrected.
 - c. At the time of the inspection, there was one 55 gallon drum containing hazardous waste (paint thinner) located in the paint shop that had a funnel but there was no gasket, therefore it was not closed. After the inspection, Mr. Sorrentino provided proof to inspector Khan showing that the violation was corrected.
 - d. At the time of the inspection, there was one 55 gallon drum containing hazardous waste (alcohol) located in the paint shop that had a funnel but there was no gasket, therefore it was not closed. After the inspection, Mr. Sorrentino provided proof to inspector Khan showing that the violation was corrected.
2. Pursuant to 6 NYCRR § 372.2(a)(8)(i)(a)(2): Containers are marked with the words “Hazardous Waste” and with other words that identify the contents of the containers.
 - a. At the time of the inspection there was one 55 gallon drum of hazardous waste in the skydrol area that was not labeled.
 - b. At the time of the inspection there was one 55 gallon drum of hazardous waste in the paint shop that was not labeled.
 - c. At the time of the inspection there was one 35 gallon drum of hazardous waste in the used oil area that was not labeled with the words hazardous waste.
3. Pursuant to 40 CFR § 273.13(a)(1), management of containers. (1) A small quantity handler of universal waste must contain any universal waste battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container. The container must be closed, structurally sound, compatible with the contents of the battery, and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

At the time of the inspection, there was one 5 gallon container that contained nickel batteries that was open. Mr. Sorrentino promptly closed the container during the inspection.

General Concerns

- Date of the universal waste containers.
- Used oil funnel with no gasket was open.

Closing Conference

The closing conference was conducted by EPA inspector Areeba Khan and the facility representatives Lawrence Montreuil and Anthony J. Sorrentino were present. Mr. Alvin Addison the Director of Quality Compliance and Safety had to go to a meeting and was not present. Inspector Khan explained to the facility representatives the areas of concerns. The facility representatives stated that they will follow up and tend to the areas of concern immediately.