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Hazardous Waste Enforcement: Alabama Department of Environmental Management and Oxford, Alabama Aircraft Repair/Maintenance Facility Enter into Consent Order

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The Alabama Department of Environmental Management (“ADEM”) and Aerospace Coatings International, LLC (“ACI”) entered into a December 4th Consent Order (“CO”) addressing alleged violations of the ADEM Administrative Code regulating hazardous waste. See Consent Order No. 20-XXX-CHW.

The CO provides that ACI operates an aircraft repair and maintenance facility (“Facility”) in Oxford, Alabama.

The Facility has an Environmental Protection Agency Hazardous Waste Identification Number. As a result of Facility operations, it is stated to be a large quantity generator as defined in the ADEM Administrative Code.

A representative of the United States Environmental Protection Agency (Region 4) and ADEM’s Industrial Hazardous Waste Branch are stated to have conducted a Compliance Evaluation Inspection (“CEI”) of the Facility to determine compliance with applicable requirements of Division 14 of the ADEM Administrative Code.

The CEI and a review of ACI’s compliance is stated to have indicated the following:

- The ACI Facility is stated to have failed to conduct timely removal of certain wastes; thereby operating a secondary containment systems/floor drain systems as hazardous waste storage tanks with no secondary containment.
- The ACI Facility is stated to have failed to meeting the conditional exclusions applicable to storage of hazardous waste in tanks by a large quantity generator.
- The ACI Facility is stated to have failed to keep closed eight satellite accumulation containers of hazardous waste.
- The ACI Facility is stated to have failed to mark or label five satellite accumulation containers of hazardous waste with the words “Hazardous Waste.”
- The ACI Facility is stated to have failed to note the time of each inspection in records of inspections at its central accumulation areas.

- The ACI Facility is stated to have failed to operate three satellite accumulation areas in a manner that minimized the possibility of release of hazardous waste into the environment.
- The ACI Facility is stated to have failed to submit the most recent revision of its contingency plan to local emergency responders.
- The ACI Facility is stated to have failed to submit a quick reference guide of its contingency plan to local emergency responders.
- The ACI Facility is stated to have failed to keep closed one container of universal waste.

ADEM submitted a Notice of Violation to ACI to which the company responded.

ACI neither admits nor denies ADEM's contentions.

A civil penalty of \$25,000 is assessed.

A copy of the CO can be downloaded [here](#).