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October 18, 2013

VIA FEDEX STANDARD OVERNIGHT DELIVERY

Lydia Guy
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 3
1650 Arch Street, Mail Code 3RC00
Philadelphia, PA 19103-2029

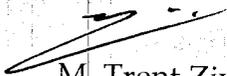
Re: **Supplemental Filing
Hagerstown Aircraft Services, Inc.
Docket No. RCRA-03-2011-0112
EAB RCRA (3008) Appeal No. 13-01**

Dear Ms. Guy:

Please find enclosed for consideration by the Regional Judicial Officer/Presiding Officer in the above-referenced matter a copy of the Maryland Department of the Environment's Report of Observations for a follow-up compliance inspection completed at Hagerstown Aircraft Services on September 18, 2013. This report, received by Hagerstown Aircraft Services on or about October 10, 2013, supplements the information and exhibits contained in the Motion to Set Aside Default Order and Temporarily Stay Proceedings filed with the Environmental Appeals Board on August 5, 2013, and ordered transferred for consideration by the Regional Judicial Officer for Region 3 on August 15, 2013.

Please don't hesitate to contact me at tzivkovich@wtplaw.com or 410-347-8778 with any questions.

Sincerely,


M. Trent Zivkovich

REGIONAL HEARING CLERK
EPA REGION III, PHILA. PA

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Lydia Guy, EPA Region 3 Regional Hearing Clerk
October 18, 2013
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Enclosure

cc: Joyce Howell, Esq., U.S. EPA Region 3

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EPA REGION 3
PHOTO COPY

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Supplemental Filing to be served on the date, by the manner indicated, to the following people:

Via FedEx, Standard Overnight Delivery and courtesy copy via electronic mail:

Joyce Howell, Esq.
Senior Assistant Regional Counsel
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Dated: October 18, 2013



Maryland Department of Environment
Land Management Administration
Hazardous Waste Program
1800 Washington Blvd, Baltimore MD 21230
(410) 537-3400

Report of Observations

RCRA ID #:	MDD042682398	Generator Status:	LQG
Facility Name:	Hagerstown Aircraft Services (HAS)		
Address:	14235 Oak Springs Road	State:	MD
City:	Hagerstown	Zip:	21742
County:	Washington		
Site Contact:	Kim Potter		
Title:	Owner/Operator	Phone #:	(301) 733-7604
Other Contact:	Alan Shanholtz, Consultant		
Inspection Type:	FUI-On-Site	Activity #:	
Inspection Start Date:	September 18 th , 2013		
End Date:	September 18 th , 2013		
MDE Lead Inspector:	Anthony Enweze		
Other Inspector:	Paul Sudano		

Documentation

<input checked="" type="checkbox"/> Photos/Videos taken	<input type="checkbox"/> Other documentation
<input type="checkbox"/> Documents obtained from facility	<input type="checkbox"/> Request for submission of documents
<input type="checkbox"/> Samples taken by outside source	<input type="checkbox"/> Samples taken by the Department

Checklist: Generator TSD Facility

Introduction

On September 18th, 2013, the Maryland Department of the Environment (MDE), solid Waste Program visited Hagerstown Aircraft Services (thereafter referred as "H.A.S") facility to conduct a second follow-up inspection (FUI). Mr. Paul Sudano and I of MDE arrived at the facility at about 10:25 AM. We met Ms. Kim Potter, the facility owner and staff consultant, Andy Shanholtz. We held a pre-inspection meeting where we discussed all the violations from the initial inspection. Mr. Shanholtz gave an update of improvements made at the facility since MDE last inspection.

Review of outstanding issues

The pre-inspection meeting with Ms. Potter and Mr. Shanholtz of H.A.S revealed that the facility has corrected and resolved the violations uncovered during recent MDE inspections. Based on inspection observations and review of submitted reports, the following corrective measures were achieved to date:

1. Based on H.A.S application, EPA Identification number under the name Alphin Aircraft Services was reassigned to H.A.S effective July 16th, 2013;
2. Hazardous waste containers were labeled and dated to comply with COMAR requirements;
3. Hazardous waste in less than 90-Days storage is disposed within 90 days without permit;
4. Liquid hazardous wastes are kept in containment to prevent releases into the environment;
5. Weekly inspection for less than 90-Day storage was in place as at the time of the inspection;
6. Universal Waste (used lamps) were in closed boxes, labeled, and dated;
7. Contingency plan was completed and implement at the time of the inspection;
8. Employees' CHS training record of July 31st, 2013 were on file at the time of inspection;
9. Aerosol can waste determination was performed and CHS properly stored for disposal;
10. Wastewater treatment unit was disconnected, dismantled and all CHS disposed;
11. Wastewater treatment unit sump with surrounding gutters was cleaned and waste disposed.

Recommendation

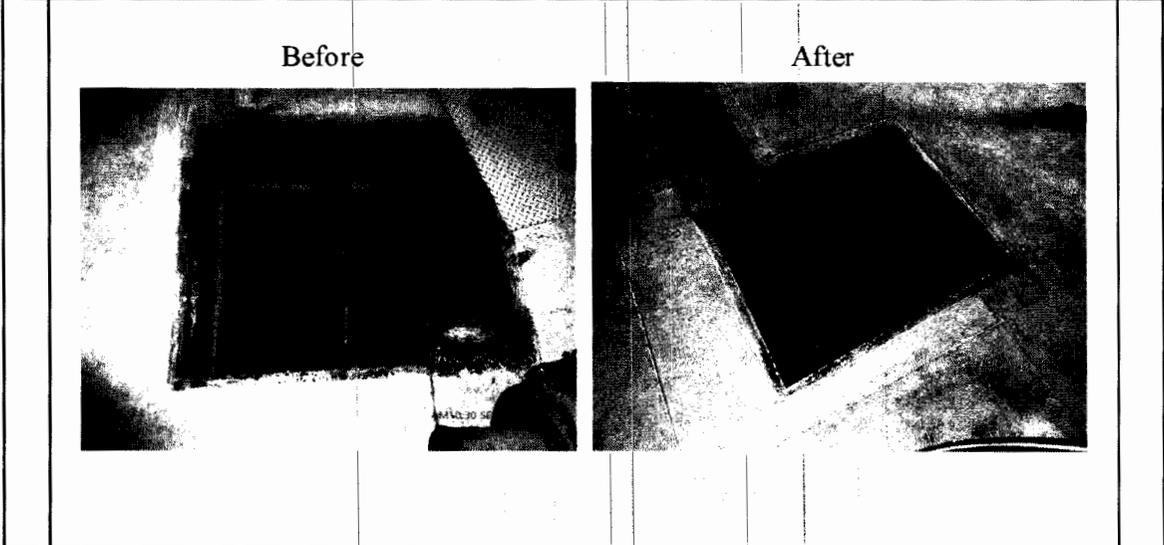
None at this time

Conclusion

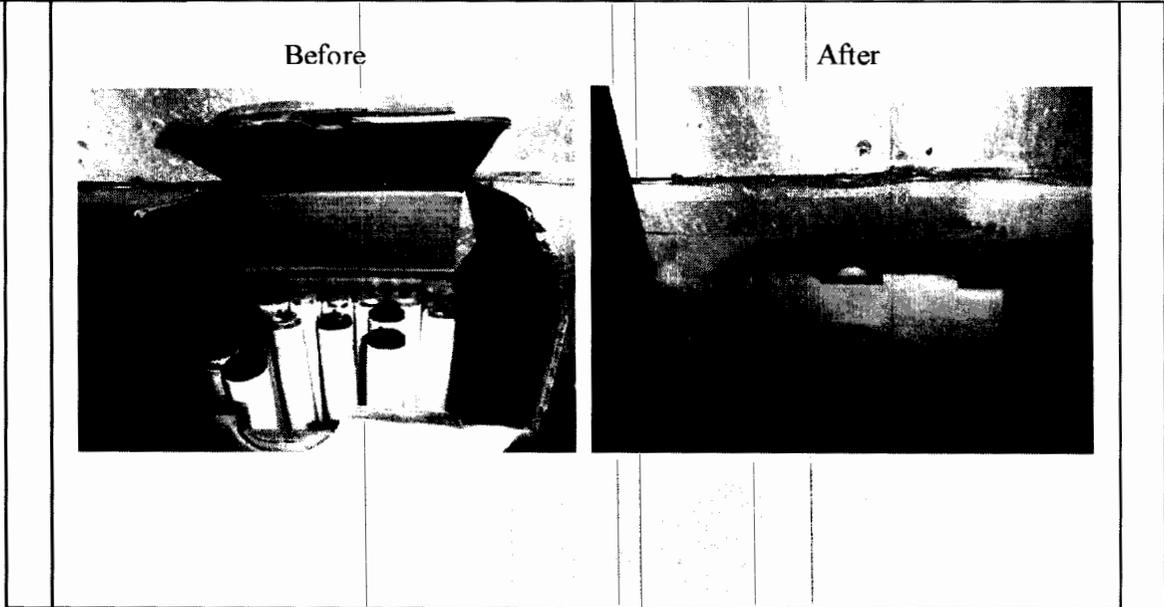
The inspection ended with a post-inspection meeting. MDE informed Ms. Potter and Mr. Shanholtz that the violations uncovered during the MDE initial inspection were corrected without any outstanding issues at the time of this inspection, September 18, 2013.

**Maryland Department of the Environment (MDE)
Hazardous Waste Program
Official Photograph Sheet**

Location:	14235 Oak Springs Road, Hagerstown in Washington County						
Photographer:	Anthony N. Enweze				Witness:		
Photo #	1	of	3	Date:	9/18/2013	Time:	
Description:	Sludge (CHS) in Sump cleaned and waste disposed						

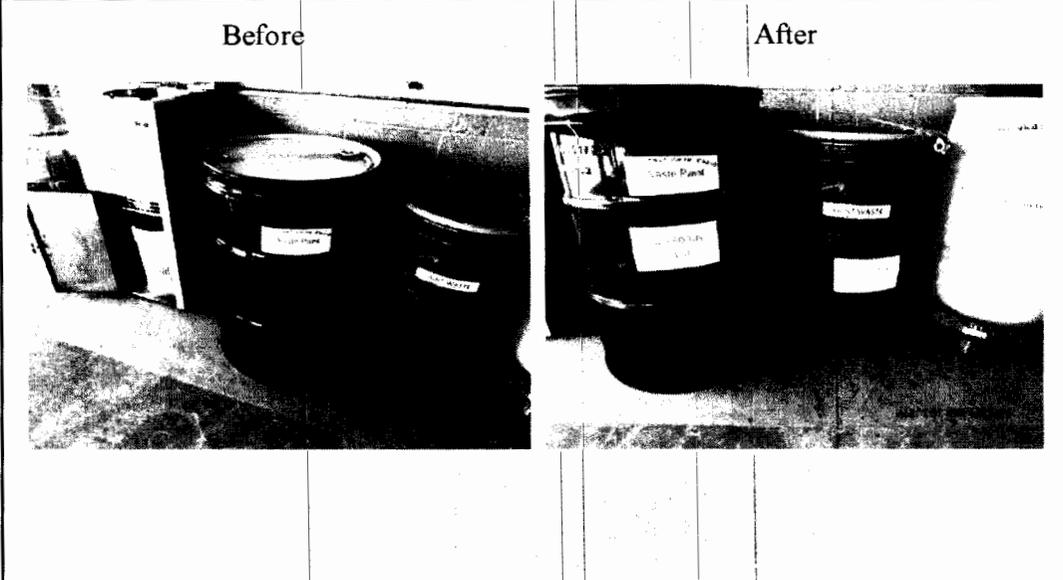


Description:	Open universal waste box corrected (closed) onsite at the time of inspection
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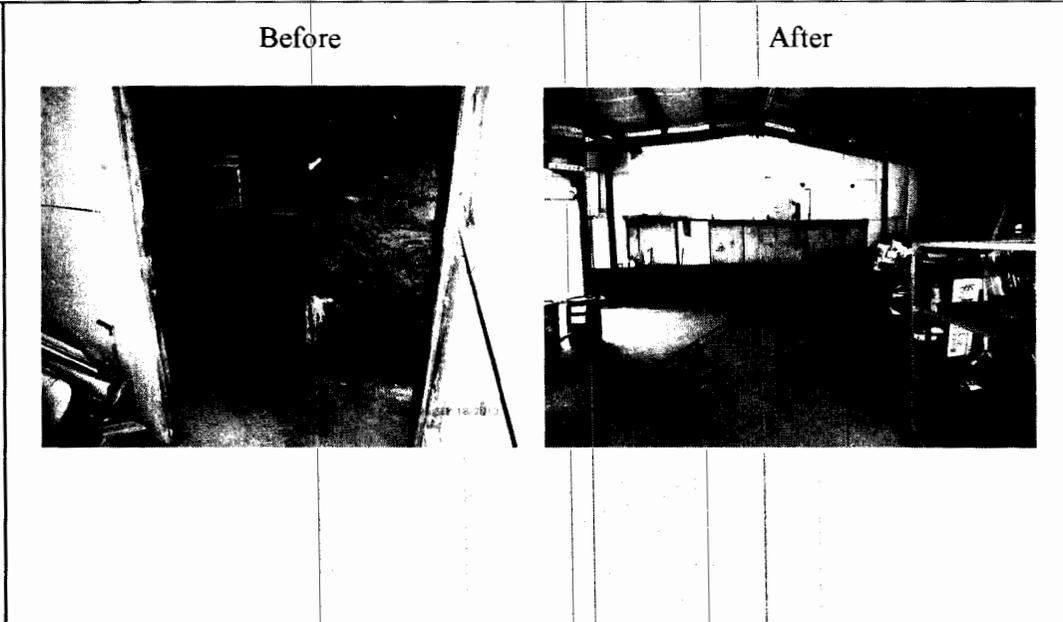


**Maryland Department of the Environment (MDE)
Hazardous Waste Program
Official Photograph Sheet**

Location:	14235 Oak Springs Road, Hagerstown in Washington County						
Photographer:	Anthony N. Enweze			Witness:	None		
Photo #	2	of	3	Date:	9/18/2013	Time:	
Description:	Unlabeled Hazardous Waste Drums at <90-Day Storage labeled during inspection						



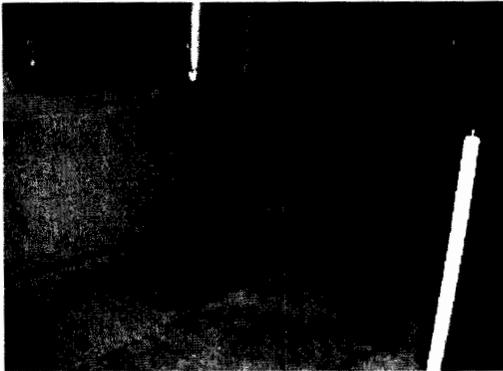
Description:	Wastewater Treatment Unit Disassembled and removed (Empty)
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**Maryland Department of the Environment (MDE)
Hazardous Waste Program
Official Photograph Sheet**

Location:	14235 Oak Springs Road, Hagerstown in Washington County						
Photographer:	Anthony N. Enweze			Witness:	None		
Photo #	3	of	3	Date:	9/18/2013	Time:	
Description:	No containment for liquid CHS containers corrected						

Before



After



Description:

Cleaned Gutter at the CHS Storage Building

