



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

August 3, 2009

**LAWRENCE COUNTY  
DOW CHEMICAL CO.  
DHWM/SEDO  
OHD039128913**

Mr. Troy DeHoff  
925 County Road 1-A  
Ironton, Ohio 45638

Dear Mr. DeHoff:

On May 28, 2009, Vicky German and I performed a compliance evaluation inspection of Americas Styrenic (AmSty)'s Styron Plant at Dow Chemical's Hanging Rock facility to determine its compliance with Ohio's hazardous waste laws and regulations, as found in the Ohio Revised Code and the Ohio Administrative Code (ORC and OAC, respectively).

Based on this inspection, a notice of violation was sent to you on June 22, 2009. I received your response letter with attachments on July 17, 2009. However, Dow's Integrated Contingency Plan (ICP) was found to limit notification to Ohio EPA for potentially hazardous waste releases to CERCLA or other reportable quantities and an NOV was issued on July 23, 2009 to AmSty and Dow.

On July 31, 2009, I received Dow's revised ICP which included language to remove this conflict. Therefore, based on my review of the revised plan, Dow has returned to compliance with the following regulation:

- (i) OAC rule 3745-54-56(A) Emergency procedures.

Based on the documentation Dow has provided, all violations from the May 2009 inspection have been abated.

Thank you for your attention to these issues. If you have any questions, please call me at (740) 380-5278.

Sincerely,

Richard Stewart  
District Representative  
Division of Hazardous Waste Management

RS/mim

cc: Mike Ratliff, Dow Chemical Company

**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.