

Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

August 17, 2011

PIKE COUNTY
SOUTHERN WOOD PIEDMONT
DMWM-SEDO
OHD089431001

Mr. William P. Arrants, President
Southern Wood Piedmont
P.O. Box 5447
Spartanburg, SC 29304

Dear Mr. Arrants:

On August 4, 2011, I received Southern Wood Piedmont's response to Ohio EPA's June 28, 2011 Notice of Violation (NOV) letter. The response included an updated Site Safety, Environmental Health and Contingency Plan dated August 3, 2011; a Safety Procedures for Entering Confined Spaces document dated September 1, 2009; and a Respiratory Protection Program document dated September 1, 2009. Southern Wood Piedmont also submitted a request for minor amendment to the post-closure plan, updating the facility's post-closure contact information. The request was received on August 2, 2011, and approved by Ohio EPA on August 10, 2011.

Review of the documentation you submitted shows that Southern Wood Piedmont has returned to compliance with the following:

- (1) Post-Closure Plan; Amendment of Plan, OAC Rule 3745-55-18(C);
- (2) Post-Closure Plan; Amendment of Plan, OAC Rule 3745-55-18(D); and
- (3) Content of Contingency Plan, OAC Rule 3745-54-52(D).

However, Southern Wood Piedmont remains in violation of the following regulation. In order to return to compliance, please submit the requested documentation **within 15 days** of your receipt of this letter:

- (4) Arrangements/Agreements with Local Authorities, OAC Rule 3745-54-37(A).
The owner/operator of a hazardous waste disposal unit must attempt to make arrangements to familiarize emergency response agencies with the layout of the facility, the associated hazards, places where personnel will normally be working, facility entrances and possible evacuation routes; to inform such agencies of safety equipment, supplies, and emergency safety procedures applicable to the facility; and to familiarize the local police, fire departments, hospitals, and any other local emergency service listed in the facility's contingency plan with the properties of hazardous waste managed at the facility and the types of injuries or illness that could result from fires, explosions or releases at the facility.

To demonstrate a return to compliance with this rule, please submit documentation that demonstrates that Southern Wood Piedmont has attempted to make the required arrangements/agreements to familiarize emergency response agencies, local police, fire departments, hospitals, and any other local emergency service listed in the facility's updated contingency plan with the properties of hazardous waste managed at the site and the types of injuries or illness that could result from fires, explosions or releases at the facility.

If you have any questions regarding this letter, please contact me at 740-380-5237.

Sincerely,



Vicky B. German
Division of Materials and Waste Management
Ohio EPA, Southeast District Office

VDG/mlm

cc: Trevor Irwin, Ohio EPA, DERR-SEDO

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.