



State of Ohio Environmental Protection Agency

Northeast District Office

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

May 27, 2008

RE: **ENVIVA MATERIALS  
SCRAP TIRE RECOVERY FACILITY  
COMPREHENSIVE INSPECTION**

Earl Cindea  
General Manager  
Enviva Materials of Youngstown, LLC  
1130 Performance Place  
Youngstown, OH 44502

Dear Mr. Cindea:

On May 15, 2008, I (Jarnal Singh), accompanied by John Hujar, of the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM) conducted a comprehensive inspection of the Enviva Materials scrap tire recovery facility, located at 1130 Performance Place, Youngstown, in Mahoning County. The purpose for my inspection was to determine compliance with the requirements set forth in Chapter 3745-27 of the Ohio Administrative Code (OAC). We met with, and were accompanied by you and Dave Daley, during my inspection of this facility.

The following violations were identified during this inspection:

- 1) **OAC 3745-27-65(D)(2)** which states, "*The owner or operator shall maintain the scrap tire handling areas and fire lanes to be free of vegetation or other combustible materials and obstructions to emergency vehicles.*"

Scrap tires were in fire lanes located between piles numbered 3 and 6, 6 and 9, 1 and 4. Scrap tires must not be stored in fire lanes.

- 2) **OAC 3745-27-65(D)(4)** states, "*The owner or operator shall store only scrap tires in the temporary scrap tire storage area.*"

Scrap tires were stored by the northeast loading dock and in the de-rimmed area. The loading dock and de-rimmed areas are **not** approved temporary scrap tire storage areas. Scrap tires not stored in compliance with the temporary storage requirements must be relocated to the approved temporary storage areas.

- 3) **OAC 3745-27-65(D)(5)** which states, "*The owner or operator shall maintain drainage such that water does not pond or collect in the scrap tire storage area.*"

Rain water was observed ponding in the fire lanes and in scrap tire storage areas. Surface grading of these areas must be conducted to prevent ponding of water.

- 4) **OAC 3745-27-65(G)** states in part, *"The fire contingency plan for scrap tire storage and recovery facilities required by this rule and any fire safety plans required by local fire codes and the state fire code in rule 1301:7-7-25 of the Administrative Code shall be submitted to the local fire chief.*

*The owner or operator shall maintain and be familiar with a fire contingency plan for the occurrence of a fire at the facility. The contingency plan shall be kept at the facility and shall be updated at least annually. The contingency plan shall be updated within thirty days if the plan fails in an emergency situation, or if information contained in the plan changes. The plan shall include at least the following information:*

- (1) An updated list of names, addresses, and phone numbers of all local police and fire departments, Ohio EPA emergency response team, Ohio EPA district office, local health department, local solid waste management district, contractors, and local emergency response teams.*
- (2) An updated list of names, addresses, and phone numbers of all persons designated to act as emergency coordinators for the facility. This list shall include at least one person authorized to commit resources necessary to procure equipment, materials, and services.*
- (3) A copy of arrangements or agreements with the local police and fire departments, contractors, and local emergency response teams to coordinate emergency services in the event of a fire at the facility.*
- (4) An updated list of all emergency equipment at the facility, including but not limited to, fire extinguishing systems and equipment, spill control equipment, and communications equipment."*

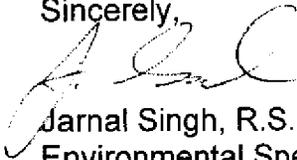
Please update the fire contingency plan to reflect current staffing and any new arrangements made with the Youngstown Fire Department. Robert Mutch was listed as the emergency contact person in the facility's Contingency Plan. I was informed during this inspection that Mr. Mutch no longer works for Enviva Materials.

Earl Cindea  
Enviva Materials of Youngstown, LLC  
May 27, 2008  
Page 3

The above mentioned violations should be addressed immediately. If you have any comments or questions concerning the contents of this letter, please do not hesitate to contact me at (330) 963-1276.

This letter shall not be interpreted to release the entity from responsibility under Chapters 3704, 3714, 3734, or 6111 of the Ohio Revised Code or under the Federal Clean Water or Comprehensive Environmental Response, Compensation, and Liability Acts for remedying conditions resulting from any release of contaminants to the environment.

Sincerely,



Jarnal Singh, R.S.  
Environmental Specialist  
Division of Solid and Infectious Waste Management

JS:cl

cc: Matt Holland, Enviva Materials  
File: [Sowers/Tire/Enviva Materials/COR/50]