OhioEPA

State of Ohio Environmental Protection Agency

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Ted Strickland, Governor
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March 18, 2008

RE: ENVIVA MATERIALS
SCRAP TIRE RECOVERY FACILITY

Robert E. Mutch
Enviva Materials of Youngstown, LLC
1130 Performance Place
Youngstown, OH 44502

Dear Mr. Mutch:

On March 12, 2008, I (Jarnal Singh), 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). I met with, and was accompanied by you 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 that were being sorted from within an approved storage pile were stored in a fire lane. Scrap tires must not be stored in the fires lanes.

2) **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"*

   Ponding of rain water was observed in fire lanes and in one of the partially empty temporary scrap tire storage areas. Surface grading of these areas should be conducted to prevent ponding of water.

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]