



**Environmental  
Protection Agency**

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

OHIO E.P.A.

JUN 14 2012

ENTERED DIRECTOR'S JOURNAL

JUN 14 2012



**CERTIFIED MAIL**

Michael R. Herman  
Southern Wood Piedmont Company  
1301 Riverplace Boulevard  
Suite 2300  
Jacksonville, FL 32207

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By: Donna Cassler Date: 6-14-12

**Re: Amended Post-Closure Plan Approval  
Southern Wood Piedmont  
OEPA ID# OHD089431001**

Dear Mr. Herman:

On October 12, 2011, Southern Wood Piedmont submitted to Ohio EPA an amended post-closure plan for the aeration pond and rainwater pond located at 279 Industrial Park Drive near Waverly, Ohio. Revisions to the amended post-closure plan were received on March 23, 2012. The amended post-closure plan was submitted pursuant to rule 3745-66-18 of the Ohio Administrative Code (OAC) in order to demonstrate that Southern Wood Piedmont's proposal for amended post-closure complies with the substantive requirements of OAC rule 3745-66-18.

The owner or operator and the public were given the opportunity to submit written comments regarding the amended post-closure plan in accordance with the hazardous waste rule requirements. No public comments were received by Ohio EPA.

Based upon review of Southern Wood Piedmont's submittal and subsequent revisions, I conclude that the amended post-closure plan for the hazardous waste facility at 279 Industrial Park Drive, as modified herein, meets the performance standard contained in OAC rule 3745-66-11 and complies with the pertinent parts of OAC rule 3745-66-18.

The amended post-closure plan submitted to Ohio EPA on October 12, 2011, and revised on March 23, 2012 by Southern Wood Piedmont, is hereby approved with the following modifications:

Section 8.2 Confirmatory Sampling, page 10 of 19: The editorial comment that was added regarding the material being classified as F034 is not needed and should be removed.

Section 8.8 Decontamination Efforts – Heavy Equipment. Page 13 of 19: The text is somewhat unclear as to the management of waste from decontamination efforts. However, the text indicates that all loose or adhering soil that is generated through decontamination will be returned to the excavation or shipped as a hazardous waste (F034).

The text also indicates that any debris will also be managed with the hazardous waste stream. A hazardous debris, as defined in OAC rule 3745-270-02, must be managed as defined in OAC rule 3745-270-45. Section (C) provides a conditional exclusion for hazardous debris if it is treated according to Table 1 of this citation. However, some PPE would not fall in this category. The text can be modified to state that hazardous debris from decontamination efforts will be managed according to OAC rule 3745-270-45. This will allow options for disposal.

Section 9.0 Ground Water Treatment Following Excavation page 15 and 19: Since the Target Level for dibenzo(a,h)anthracene (0.00000751 mg/L) is less than the Practical Quantitation Limit (PQL) (0.00005 mg/L), a weight of evidence approach will be used to evaluate this chemical of concern (COC). Provided that the other COC's meet their Target Levels and dibenzo(a,h)anthracene is equal to or less than the PQL, dibenzo(a,h)anthracene will be assumed to meet its Target Level.

Compliance with the approved post-closure plan, including the modifications specified herein, is expected. Ohio EPA will monitor such compliance. Ohio EPA expressly reserves the right to take action, pursuant to chapters 3734. and 6111. of the Ohio Revised Code, and other applicable law, to enforce such compliance and to seek appropriate remedies in the event of noncompliance with the provisions and modifications of this approved plan. Please be advised that approval of this amended post-closure plan does not release Southern Wood Piedmont from any responsibilities regarding corrective action for all releases of hazardous waste or constituents from any waste management unit, regardless of the time at which waste was placed in the unit.

You are hereby notified that this action of the director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within 30 days after notice of the director's action. The appeal must be accompanied by a filing fee of \$70.00 (made payable to "Ohio Treasurer of State") which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the director within three days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17<sup>th</sup> Floor  
Columbus, OH 43215

When post-closure is completed, OAC rule 3745-66-20 requires the owner or operator of a facility to submit to the director of Ohio EPA, certification by the owner or operator and an independent registered professional engineer that the facility has completed the post-closure case period in accordance with the approved post-closure plan. The certification by the owner or operator shall include the statement found in OAC rule 3745-50-42(D). These certifications should be submitted to:

Ohio Environmental Protection Agency  
Division of Environmental Response and Revitalization  
P.O. Box 1049

Columbus, Ohio 43216-1049  
Attn: Edwin Lim, Engineering Section

A copy should also be sent to:

Ohio Environmental Protection Agency  
Division of Environmental Response and Revitalization  
Southeast District Office,  
2195 Front Street  
Logan, Ohio 43138  
Attn: Trevor L. Irwin, RS

If you have any questions about implementing this post-closure plan, contact Trevor L. Irwin at (740)385-8501.

Sincerely,



Scott J. Nally  
Director

cc: Ed Lim, Manager, DERR, CO  
Trevor L. Irwin, DERR, SEDO  
Erik Hagen, DERR, CO  
Connie Livchak, FARU-DMWM, CO  
Brad Hauser, RADMU-DMWM, CO  
Cynthia J. Lilly, Rayonier Inc  
Warren Snyder, Rayonier Inc  
Barb Knecht, HzW