



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Molly Joseph Ward  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4000  
1-800-592-5482

July 8, 2016

Mr. Timothy Borris  
Vice President of Operations  
Hoover Treated Wood Products Inc. Corporate Office  
154 Wire Road  
Thomson, Georgia 30824

### Via Electronic Mail

**Re: Renewal of Hazardous Waste Management Permit – Approval  
Hoover Treated Wood Products, Inc. – Milford, Virginia  
EPA ID# VAD988190021**

Dear Mr. Borris:

Enclosed is the final Hazardous Waste Management Permit (Permit) issued to Hoover Treated Wood Products, Inc. (Hoover) site, located in Milford, Virginia by the Virginia Department of Environmental Quality (DEQ). The final permit has been approved and will become effective on July 8, 2016.

The final permit decision is in accordance with the Virginia Hazardous Waste Management Regulations (VHWMR), 9 VAC 20-60, 9 VAC 20-60-124, which incorporates 40 CFR Part 124 by reference. The Permit is for renewal allowing the facility to defer post-closure care to site-wide corrective action and continue to manage hazardous waste generated from this unit. The renewal permit incorporates proposed final remedies, as detailed in the Statement of Basis (SB), dated May 13, 2016. These final remedies include: groundwater extraction to reduce concentrations of arsenic in groundwater, continued groundwater monitoring, and implementation of institutional controls for groundwater and soils to restrict the facility to non-residential uses.

The draft permit was assembled after finding that the Part A and Part B permit application received on June 17, 2015 with additional information received on September 10, 2015 were complete and technically adequate. Public notice on the draft permit was advertised in *The Free Lance Star*, servicing the Milford, VA area on May 16, 2016 and re-advertised on May 31, 2016 and the radio announcement was broadcasted on radio station WWUZ 96.9 FM on May 19, 2016. The public comment period ended on July 5, 2016.

Mr. Tim Borris  
Hoover Treated Wood Products, Inc.  
July 8, 2016  
Page 2 of 3

Two (2) written comments were received during the public comment period. The DEQ received no comments expressing the opinion that the permit should be denied. Therefore, in accordance with 40 CFR § 124.15, the Director of the DEQ has made a final decision to issue the Hazardous Waste Management Permit for Corrective Action. The final permit is enclosed [Enclosure 1].

With this final permit decision, the DEQ has prepared the enclosed "Response to Comments Document" dated July 6, 2016 for Hoover [Enclosure 2] which is in accordance with 40 CFR § 124.17. The "Response to Comments Document" specifies which provisions of the draft permit, if any, have been changed in the final permit decision, and the reasons for the change. In addition, this document describes and responds to all significant comments on the draft permit or the permit application, raised during the public comment period.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date of service of this decision to initiate an appeal by filing a notice of appeal with:

David K. Paylor  
Director, Virginia Department of Environmental Quality  
P.O. Box 1105  
Richmond, Virginia 23218

In the event that this decision is served to you by mail, three days are added to this period. Please refer to Part 2A of the rules of the Supreme Court of Virginia, which describes the required contents of the Notice of Appeal, including specification of the Circuit Court to which the appeal is taken, and additional requirements governing appeals from the decisions of administrative agencies.

The DEQ appreciates the courtesy and professionalism shown during the permitting process. If we can provide further assistance, please contact Angela Alonso of my staff at (804) 698-4328 or by e-mail at [Angela.Alonso@deq.virginia.gov](mailto:Angela.Alonso@deq.virginia.gov).

Sincerely,



Leslie A. Romanchik  
Hazardous Waste Program Manager  
Office of Financial Responsibility and Waste Programs

Enclosures:

1. Final Hazardous Waste Management Permit
2. Response to Comments Document

Mr. Tim Borris  
Hoover Treated Wood Products, Inc.  
July 8, 2016  
Page 3 of 3

cc: Cassie McGoldrick, EPA, Region III (3LC50)  
Richard Doucette – DEQ, NRO  
Angela Alonso, Brett Fisher, Tara Mason – DEQ, CO  
CO File

Kevin Sommers – ATC Group Services, LLC  
John Johnson, Troutman Sanders, LLP  
Brian Davis, Hoover Treated Wood Products, Inc.