



State of Ohio Environmental Protection Agency

**Southeast District Office**

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Logan, Ohio 43138

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

April 10, 2008

**LAWRENCE COUNTY  
GENERAL FILE  
(RIVER VALLEY HOSPITAL)  
DHWM/SEDO  
NON-NOTIFIER**

Mr. Kevin Halter, Vice President  
Our Lady of Bellefonte Hospital  
St. Christopher Drive  
Ashland, KY 41101

Dear Mr. Halter:

On March 19, 2008, Ohio EPA conducted a walkthrough of the closed River Valley Hospital (RVH) in Ironton to determine compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). Clint Shuff, John Rochotte, and I represented Ohio EPA during the walkthrough, and Mr. Michael Garrett of Burgess & Niple represented the Ironton Port Authority/Our Lady of Bellefonte. The Ironton Port Authority, in partnership with Our Lady of Bellefonte, applied for and received Clean Ohio Funds (COF) for asbestos abatement and demolition of the hospital.

During the walkthrough, we found the following violation of Ohio's hazardous waste law. In order to correct this violation, you must do the following and send me the required information:

- (1) **OAC Rule 3745-52-11, Hazardous Waste Determination:** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

During the hospital walkthrough, we observed numerous chemicals, wastes, and materials that have not been evaluated to determine if they are hazardous wastes. The following is a list of the chemicals, wastes, and materials observed:

- Lab Chemicals - Histology, Chemistry, Pathology, Hematology, Blood Bank, Bacteriology labs. Potassium ferro cyanide, formalin, acetone, polyethylene glycol, acids/bases, various chemicals observed.
- Storage Room Chemicals - Chromium trioxide, silver nitrate, sodium hydroxide, phenol, various chemicals observed.
- Central Receiving - Toluene, various chemicals
- Cylinders - O<sub>2</sub>, CO<sub>2</sub>, He cylinders
- Electronics - TV's, monitors, electronic equipment
- Boiler Room Chemicals
- Air handling system chemicals - drum of "Ucartherm conc."
- Cleaning Chemicals - Throughout hospital, in numerous cabinets.

- Dark Room Chemicals - Photochemicals
- Maintenance Room - 5 g. buckets, sulfuric acid, 55 g. Wastron drum
- Laundry Room Chemicals - 30 g. of hi-Chlor (bleach), ~200 g. laundry cleaner
- Rooftop Mechanical Room Chemicals - Refrigeration oils, other chemicals
- Fluorescent bulbs - Universal waste
- Equipment with lubricating oils/greases
- Mercury thermostats/Mercury containing devices & equipment
- Lead based paint on walls?
- Lead apron(s)
- Fire extinguishers
- Paint & Wallcovering/Floor Adhesives
- Miscellaneous Batteries - Check for batteries in equipment/electronics
- Unlabeled/unknown containers

The above chemicals, wastes, and materials must be properly evaluated to determine if they are hazardous wastes, and the results sent to my attention at this office. It should be noted that the above list is not an exhaustive list, just what we observed during the walkthrough. All wastes at the hospital will have to be properly evaluated.

Based on our discussions, it is Ohio EPA's understanding that waste identification and evaluation at RVH will commence through implementation of the Clean Ohio Fund's contracting and scheduling process and that these actions will lead to the abatement of these violations. As these actions are completed, please send Ohio EPA the waste evaluation results, and manifests and/or receipts showing that the material was properly disposed.

Should you have any questions, please call me at (740) 380-5288.

Sincerely,



Scott N. Bergreen  
Environmental Specialist  
Division of Hazardous Waste Management

SNB/dh

cc: Tiffani Kavalec, DERR, CO  
Clint Shuff, DSIWM, SEDO  
Harry Sarvis, DHWM, CO  
Michael Garrett, Burgess & Niple  
Craig Butler, Chief, SEDO  
Louis Boerger, Portsmouth Local Air Authority

**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.



**OHR000110981-002-01/31/2007**

**Hazardous Waste**

**NOV**

**LAWRENCE**

**THACKER'S TRUCK REPAIR**

**01/31/2007**



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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Frank Thacker  
 Thacker's Truck Repair  
 231 Township Road 1034  
 South Point, OH 45680

2. Article Number  
 (Transfer from service label)

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**COMPLETE THIS SECTION ON DELIVERY**

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 PO Box No.:   
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