



State of Ohio Environmental Protection Agency

Southeast District Office

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

April 20, 2009

**ROSS COUNTY
GENERAL FILE
(ADENA REGIONAL MEDICAL CENTER)
DHWM/SEDO
OHD981961360**

Ms. Sheryl McCorkle
Adena Regional Medical Center
92 Hospital Drive
Chillicothe, Ohio 45601

Dear Ms. McCorkle:

On April 14, 2009, Ohio EPA re-inspected Adena Regional Medical Center ("ARMC") in Chillicothe, Ohio. The purpose of the re-inspection was to determine compliance with Ohio's universal waste regulations as found in OAC 3745-273. Based on the re-inspection, Ohio EPA has determined that ARMC has now abated all violations previously cited as a result of Ohio EPA's October 15, 2009 inspection.

GENERAL COMMENTS

- (a) ARMC is now accumulating spent universal waste fluorescent lamps within a storage facility outside of the main building. This spent lamp storage area is in very close proximity to fork lift traffic. During the inspection, I observed that boxes containing new computers had been placed, by forklift, within inches of boxes which contained spent lamps. In fact, one box of spent lamps appeared to have been bumped by the forklift activities, although no damage to the spent lamps was had occurred. For safety purposes, and in order to avoid an accident where spent lamps could break and release mercury, Ohio EPA recommends that ARMC move the stored universal waste lamps to an area of the storage facility that is designated **only** for spent lamps and in which fork lift traffic and storage of other materials does not occur. Alternatively, ARMC should create a "no fork lift traffic" buffer area around the stored lamps, and reinforce this with barriers or posts surrounding the lamp area. Another alternative would be to construct a caged area for spent lamps. Please submit a written response to this comment, as Ohio EPA is concerned that the current storage situation will result in future violations due to accidental lamp breakage.

- (b) During the inspection, you requested information on the design of a hazardous waste accumulation building and possible sources of funding. I am not aware of any Ohio EPA sources of funding for such buildings. In addition, Ohio EPA does not have design or construction guidance. However, I found the following information on the web after doing a search for "hazardous waste storage building design":

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The Solid Waste Alaska Network (SWAN) guidance on waste storage buildings that includes some design layouts:

http://74.125.47.132/search?q=cache:uSaTMdBYL3YJ:www.ccthitaswan.org/Tutorials/storing_hazwaste.cfm+hazardous+waste+storage+building+design&cd=4&hl=en&ct=clink&gl=us

The US Department of Defense has also produced a very thorough guidance on the design considerations for hazardous waste storage buildings:

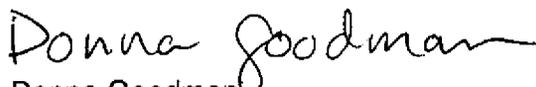
www.wbdg.org/ccb/DOD/UFC/ufc_4_451_10n.pdf

There are companies such as below that provide custom hazardous waste storage buildings. This is being provided for information purposes only. Ohio EPA does not endorse any specific companies that provide hazardous waste storage buildings.

http://www.safebuildingscorp.com/new_hazBuild.html?ovchn=GGL&ovcpn=Hazmat&ovcrn=hazardous+storage+buildings&ovtac=PPC&utm_source=GGL&utm_campaign=Hazmat&utm_content=Hazmat&utm_term=hazardous%2Bstorage%2Bbuildings&utm_medium=PPC

Please submit the above requested documentation to this office within **30 days** of the date of this letter demonstrating that comment (A) above has been addressed. Should you have any questions, please feel free to contact me at 740-380-5293.

Sincerely,



Donna Goodman
District Representative
Division of Hazardous Waste Management

DG/mlm

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.