



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

January 15, 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:

I received your response to my October 29, 2008 Notice of Violation letter on December 1, 2008. The documents you submitted included documentation of the offsite disposal or recycling of used oil, manifests from BBU, a description of certain waste streams, and "certificates of analysis" for mercury for a variety of GE lamps used by ARMC.

My review of this documentation reveals that ARMC remains in violation of the following:

- (1) **OAC Rule 3745-52-11, Waste Evaluation:** Any person who generates a waste in the state of Ohio must evaluate the waste to determine if it is a hazardous waste.

ARMC has failed to adequately evaluate spent fluorescent lamps in order to determine if they are a characteristic hazardous waste. Lamps are currently disposed of as a solid waste. While ARMC has, to date, submitted MSDS information for spent lamps and has submitted certificates of analysis for mercury, ARMC has failed to adequately determine whether spent lamps meet or exceed the TCLP limits for lead and cadmium. In addition, the TCLP information submitted for mercury does not provide information which would allow us to conduct a data validation. This was explained to you in a detailed email dated December 10, 2009 in which I requested ARMC's response by January 1, 2009. I received an email from you on December 26 stating that ARMC was "working on" a response. To date, a response has not been received.

In order to abate this violation, ARMC must immediately evaluate all types of spent lamps that it generates and submit analytical results for lead, cadmium and mercury (not summaries such as certificates of analysis) to this office for review. The results must be adequate on which to conduct a data validation. Alternatively, and recommended by Ohio EPA, ARMC may begin to manage spent lamps by recycling them as universal waste, therefore, negating the need to provide a waste evaluation. The following is information on proper management of spent lamps as a universal waste, and a list of lamp recyclers. If you do choose this option, please submit a description of how ARMC plans to manage spent lamps from this point forward.

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[http://www.epa.state.oh.us/dhwm/pdf/Universal\\_Waste\\_Rules\\_for\\_Handlers\\_of\\_Lamps.pdf](http://www.epa.state.oh.us/dhwm/pdf/Universal_Waste_Rules_for_Handlers_of_Lamps.pdf)

<http://www.epa.state.oh.us/dhwm/pdf/comp.lamp.ballast.list.pdf>

**Failure to abate the above violation within the requested time frame may result in escalated enforcement action, including fines and penalties.** Please submit the above requested documentation to this office within **15 days** of the date of this letter demonstrating that all violations have been abated. Should you have any questions, please feel free to contact me at 740-380-5293.

Sincerely,

*Donna Goodman*

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.***