



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

October 29, 2008

**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 October 15, 2008, Ohio EPA inspected Adena Regional Medical Center ("ARMC") in Chillicothe, Ohio. The purpose of the inspection was 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). This letter will explain violations I found, general concerns I have, and what you need to do to respond to my general concerns and any pollution prevention opportunities I identified.

I found the following violations of Ohio's hazardous waste laws. In order to correct these violations, you must do the following and send me the required information **within thirty days** of the date of this letter:

- (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 failed to evaluate spent fluorescent lamps in order to determine if they are a listed or characteristic hazardous waste. Lamps are currently disposed of as a solid waste. While ARMC has submitted MSDS information for spent lamps, it does not address whether lamps meet TCLP limits for lead, mercury and cadmium.

In order to abate this violation, you must immediately evaluate all types of spent lamps that you generate and submit analytical results to this office for review. Alternatively, you may submit to this office TCLP results from the manufacturer for mercury, cadmium and lead for each type of bulb that ARMC uses and disposes of. 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.

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>

GENERAL COMMENTS

- (a) As discussed in our most recent telephone conversation, please submit a copy of all manifests for ARMC wastes that were managed by BBU Services. We'd appreciate receiving these copies by US mail, as faxes of manifests are not typically legible.
- (b) Please submit all receipts for recycling or disposal of used oil in the past three years. I received one manifest dated 10/23/07 which includes one drum of used oil.
- (c) During the inspection, I was informed that your company plans to purchase a fluorescent lamp bulb crusher. ARMC has not yet adequately determined if lamps are a hazardous waste when spent. However, regardless of whether they are hazardous or not, Ohio EPA does not recommend crushing of spent fluorescent lamps prior to either disposal or recycling. We recommend recycling all (hazardous or non hazardous) spent lamps as a universal waste, as even the "green tip" lamps contain small but recoverable amounts of mercury, lead and cadmium. Information on lamp recycling is included in citation #1, above. If lamps happen to break while managing them onsite, broken lamps should be immediately cleaned up, containerized and managed as a universal waste. Note that harmful mercury vapors can be released from broken lamps and from lamp crushing units, even if they are designed to control emissions. Please see an article at the following link called "Do You Crush Your Lamps?" While dated, this article explains Ohio EPA's position on lamp management:

<http://www.epa.state.oh.us/dhwm/pdf/NotifierSpring04.pdf>

- (d) Please submit a description of all waste streams on the manifests that ARMC has submitted for 2006, 2007 and 2008, other than the xylene lab waste, batteries and used oil. For example, for the 10/18/07 manifest, please describe what "waste ethyl acetate" (F003/D001) and "waste phenol" (U188") were, and how they were generated.
- (e) While ARMC was a conditionally exempt small quantity generator (CESQG) at the time of the inspection, ARMC is typically an episodic small quantity generator (SQG) during some months of the year when slightly larger volumes of hazardous waste are generated. Because ARMC is undergoing a large expansion and business is on the rise, it is expected that ARMC will become an SQG on a regular monthly basis, as it is currently just on the verge of that each month. As discussed during the inspection, Ohio EPA encourages ARMC to immediately begin to comply with all SQG rules each month in order to assure ongoing compliance. The following Generator Handbook contains information on the SQG regulations and how to comply with them:

http://www.epa.state.oh.us/dhwm/pdf/gen_handbook.pdf

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Enclosed, you will find a copy of the checklists that were completed as a result of the inspection. Should you have any questions, please feel free to call me at (740) 380-5293. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,

Donna Goodman

Donna Goodman
District Representative
Division of Hazardous Waste Management

DG/mlm

Enclosure

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.

Ohio Environmental Protection Agency
RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM

For Ohio EPA use only

E-mail this completed form to
tammy.mcconnell@epa.state.oh.us or mail it to Tammy
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD981961360									
3. Site Name	Name: Adena Regional Medical Center					Website: (Optional)				
4. Site Location Information	Street Address: 92 Hospital Road									
	City, Town, or Village: Chillicothe					State: OH				
	County Name:					Zip Code: 45601				
5. Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>		
6. NAICS code(s) www.census.gov/epcd/www/naics.html	622110									
7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Sheryl			MI:	Last Name: McCorkle					
	Phone Number: 740-779-7509				Phone Number Extension:					
	E-Mail Address:									
	Fax Number:				Fax Number Extension:					
	Street or P.O. Box:									
	City, Town or Village:			State:			Country:		Zip Code:	
	Name of Site's Legal Owner: Adena Regional Medical Center									
Date Became Owner (mm/dd/yyyy):										
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
	Street or P.O. Box:									
	City, Town or Village:				Owner Phone #:					
	State:				Country:		Zip Code:			
	Name of Site's Operator:					Date Became Operator (mm/dd/yyyy):				
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
	Street or P.O. Box:									
	City, Town or Village:				Operator Phone #:					
State:				Country:		Zip Code:				
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No									
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)										
<input type="checkbox"/> Not Regulated					<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11					<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)					<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)										
<input type="checkbox"/> Hazardous Waste Transporter					<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste					<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste					<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility										

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))			
<input type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.			
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
Announced	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments:
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Donna Goodman			10/15/2008 10:00 AM
14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.			
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)	Date (mm/dd/yyyy)

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: #100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: $\geq 1,000$ Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No N/A

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes No N/A

TREATMENT OF HAZARDOUS WASTE

4. Does the generator treat hazardous waste in a:

a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A

b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes No N/A

c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A

d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

REMARKS

#1. Spent lamps were not evaluated.

USED OIL GENERATOR REQUIREMENTS

NOTE: (Short Version) - This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes No NA
- Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes No NA
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No NA
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes No NA

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes No NA
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes No NA
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No NA
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No NA
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)] Yes No NA
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes No NA
- b. Contained the release? Yes No NA
- c. Cleaned up and properly managed the used oil and other materials? Yes No NA
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No NA

10. Does the generator burn used oil in used oil fired space heaters? [3745-279-23] If so: Yes No NA
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No NA
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No NA
- c. Are the combustion gases from heater vented to the ambient air? Yes No NA
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No NA

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes No NA
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No NA
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes No NA

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No NA

REMARKS

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Adena Regional Medical Center Facility Type: CESQG Date of Inspection: EPA ID#: OHD981961360

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 Tissue prep and stainer in Histology laboratory	Spent xylene/alcohol F003/D001	26 to 30 gallons		Veolia, W. Carrolton, OH	Solvent still in histology lab	
2 Miscellaneous activities	Unused or offspec lab chemicals or cleaners	varies		Same as above		

REMARKS/GENERAL INFORMATION

General Process Information:

Adena Regional Medical Center (ARMC) is a large regional hospital and medical facility that is in the process of expansion. Lab wastes are generated in the histology lab. Future lab wastes will also be generated in the dermatology office. During the inspection ARMC was a CESQG, however, they are on the verge of becoming an SQG and episodically generate SQG volumes of wastes during some months if miscellaneous lab chemicals and waste cleaning products are manifested offsite. It is probable that the company will become a SQG on a monthly basis in the near future. During the inspection, SQG rules were discussed with them.

Regulatory/Enforcement History (if applicable):

ARMC clean closed a waste pit in the 1990's. Waste lab chemicals were burned in this pit.

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other: ARMC has fulfilled its corrective action obligations regarding the waste pit. No other units have been found at the facility.