



**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

June 28, 2011

**CERTIFIED MAIL**

Mr. Matt Reed  
Ashtabula County Medical Center  
2420 Lake Avenue  
Ashtabula, OH 44004

**RE:** Certified Warning letter for failure to submit permit applications, usage records and notifications.  
Ohio EPA Facility ID 02-04-01-0055

Dear Mr. Reed:

The purpose of this letter is to notify you that Ashtabula County Medical Center is operating emission units B005, P001, and two emergency generators in violation of Ohio Administrative Code (OAC) Rules 3745-31-03(A)(4), 3745-31-02(A)(1)(b), 3745-15-03(A), Ohio Revised Code (ORC) 3704.05(C), and 40 CFR Part 63 Subpart WWWW. After the inspection performed on April 21, 2011, the following information was requested in a follow-up letter:

- Permit-by-Rule notification for two emergency generators installed in the early 1980's;
- an updated PTIO application for B005; and
- a copy of the last 5 years of ethylene glycol usage records. Although purchase records are maintained for ethylene oxide, they are not kept on a rolling 12-month average basis as required by PTI 02-0101 issued 05/15/1996.

Moreover, on 12/28/2007, U.S. EPA released the National Emission Standards for Hospital Ethylene Oxide Sterilizers. The rule contains specific requirements for the sterilizer and a deadline to submit initial notification of compliance to U.S. EPA.

To date, this information has not been submitted. Consequently, Ashtabula County Medical Center is operating these sources in violation of permit terms and conditions, the OAC, ORC and Code of Federal Regulations.

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In order to move toward compliance, please submit the required information at the Northeast District Office **within thirty (30) days of receipt of this letter**. Since several years of data are missing for the ethylene oxide sterilizer, the required information may be submitted in a condensed form as a summation of usage for each year. Failure to respond to this request in the stated time frame can result in a referral to the Central Office of Ohio EPA, and the U.S. EPA for the appropriate enforcement action.

Free assistance with state and/or federal regulations, rules, laws or permit conditions can be provided at no charge through the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP). The OCAPP contact in NEDO is Adrienne La Favre, who can be contacted at (330) 963-1250.

The submission of the requested data does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in ORC 3704.06. Ohio EPA will decide whether to pursue or decline to pursue penalties regarding this matter at a later date.

Should you have any questions, please feel to call me at (330) 963-1222.

Sincerely,



Zorica Dejanovic  
Environmental Specialist  
Division of Air Pollution Control

ZD:bo

enclosure

pc: Bill MacDowell, U.S. EPA, Region 5  
Tom Kalman, Ohio EPA, DAPC, CO  
Ed Fasko, Ohio EPA, NEDO, DAPC  
Tim Fischer, Ohio EPA, NEDO, DAPC  
Bob Princic, Ohio EPA, NEDO, DAPC