

Environmental  
Protection Agency

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

March 27, 2012

RE: LAKE HEALTH – WEST MEDICAL CENTER  
OHD034517193  
LAKE COUNTY  
RTC

Roger Millirons  
Lake Health – West Medical Center  
36000 Euclid Ave.  
Willoughby, OH 44094

Dear Mr. Millirons:

I have received your March 13, 2012 letter which responded to my February 29, 2012 letter regarding my recent inspection of Lake Health – West Medical Center (Lake Health) located at 36000 Euclid Avenue, Willoughby, Ohio. As outlined below, all violations and concerns have been corrected.

1. **OAC Rule 3745-52-40 – Recordkeeping.**  
Previously corrected.
2. **OAC Rule 3745-52-34(D)(5)(c) – Employees familiar with waste handling and emergency procedures.**  
Your letter and its attachments document your correction of this violation.
3. **OAC Rule 3745-52-34(C)(1) – Satellite accumulation area.**  
I have received a copy of the manifest for the March 1, 2012 shipment which included this waste xylene and which documents the correction of this violation. New waste containers must be labeled as waste xylene and/or as hazardous waste.
4. **OAC Rule 3745-52-34(D)(4) – Container labeling.**  
Previously corrected.
5. **OAC Rule 3745-66-74 – Inspections of container storage areas.**  
You sent completed example inspection logs for both the laboratory satellite accumulation area and the hazardous waste storage room which documents the correction of this violation. Areas that fit the satellite accumulation partial exemption do not need to comply with this weekly inspection requirement.
6. **OAC Rule 3745-65-33 – Testing and maintenance of equipment.**  
Your letter and its attachments document your correction of this violation.
7. **OAC Rule 3745-279-22(C) - Used oil labels.**  
Previously corrected.
8. **OAC Rule 3745-273-14(A) - Universal waste battery labeling.**  
Previously corrected.

Roger Millirons  
Lake Health – West Medical Center  
March 27, 2012  
Page 2

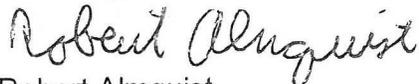
9. OAC Rule 3745-273-13 (D)(1) - Universal waste lamp containers.  
Previously corrected.
10. OAC Rule 3745-273-14 (E) - Universal waste lamp labeling.  
Previously corrected.

The following concerns were found:

1. As mentioned in number 3 above, I have received a copy of that manifest.
2. Your letter states these containers will be emptied within 24 hours of being put into the hazardous waste storage room.
3. You sent the analysis results of this waste and stated it will no longer be disposed of into the sanitary sewer. The analysis shows that it is an ignitable hazardous waste with the D001 waste code. It must be managed and disposed of as a hazardous waste.
4. This waste was shipped to Chemtron on March 1, 2012. You stated that any similar waste generated will be managed as universal waste.

If you have any questions, please contact me at (330) 963-1217, or [robert.almquist@epa.state.oh.us](mailto:robert.almquist@epa.state.oh.us).

Sincerely,



Robert Almquist  
Division of Materials and Waste Management

RA:cl

ec: Frank Popotnik, DMWM, NEDO  
Natalie Oryshkewych, DMWM, NEDO  
Marlene Kinney, DMWM, NEDO  
Jeff Mayhugh, DMWM, CO