

**Environmental  
Protection Agency**

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

Re: Fisher-Titus Medical Center  
OHD076893635  
Hazardous Waste  
Huron County  
Partial Return to Compliance

June 27, 2012

Ms. Lorna Schwab Strayer, Senior Vice President  
Administrative Services  
Fisher-Titus Medical Center  
272 Benedict Avenue  
Norwalk, Ohio 44857

Dear Ms. Strayer:

Thank you for your response dated May 22, 2012, and received by Ohio EPA via email on May 29, 2012. This was submitted in response to Ohio EPA's May 9, 2012, Notice of Violation/Partial Return to Compliance (NOV/PRTC).

On May 29, 2012, you submitted your pharmaceutical waste policy outlining how you intend to manage and manifest your P-listed hazardous waste in the future so that there are no discrepancies between the amount of waste indicated that is picked up for disposal and what Fisher-Titus states is actually being generated to satisfy Area of Concern A.) P wastes coded on the manifests, as outlined in the May 9, 2012, NOV/PRTC. This information was satisfactory to address this concern.

In addition, your response stated that "Metal-bearing hazardous wastes (D007, D010, D011) shall be co-generated with hazardous waste that must be combusted...." to satisfy Area of Concern B.) Incineration of metal-bearing hazardous wastes, as outlined in the May 9, 2012, NOV/PRTC. Upon further review, Ohio EPA believes that your metal-bearing wastes (D007, D010, D011) most likely contain greater than 1% TOC and thus meet the requirement of OAC Rule 3745-270-03(C), via this condition (not the condition of co-generated with hazardous waste that must be combusted).

My review of this documentation reveals that Fisher-Titus has adequately demonstrated abatement of the following violations discovered during the March 29, 2012, and April 3, 2012, compliance evaluation inspection (CEI) as listed below:

<b>Violation</b>	<b>Date Violation Observed</b>	<b>Date Violation Abated</b>
2. OAC Rule 3745-52-20(A) Use of Hazardous Waste Manifest.	March 29, 2012	March 29, 2012
3. OAC Rule 3745-65-33 Testing and Maintenance of Equipment.	March 29, 2012	April 4, 2012
4. OAC Rule 3745-270-07(A)(1) Land Disposal Restrictions, Must determine if hazardous waste needs to be treated.	March 29, 2012	March 29, 2012
5. OAC Rule 3745-270-07(A)(2) Land Disposal Restrictions, Notification Requirements.	March 29, 2012	March 29, 2012
6. OAC Rule 3745-273-13 (A)(1) Waste management - standards for small quantity handlers of universal waste (batteries).	March 29, 2012	April 4, 2012
7. OAC Rule 3745-273-14 (A) Waste management - Labeling/marketing standards for small quantity handlers of universal waste (batteries).	March 29, 2012	April 4, 2012
8. OAC Rule 3745-273-13 (D) (1) Waste management - standards for small quantity handlers of universal waste (lamps).	March 29, 2012	April 4, 2012
9. OAC Rule 3745-273-14 (E) Waste management - Labeling/marketing standards for small quantity handlers of universal waste (lamps).	March 29, 2012	April 4, 2012

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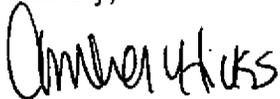
*In addition, Fisher-Titus satisfied the areas of concern outlined in the May 9, 2012, NOV/PRTC with their May 29, 2012, response. Thus, no additional violations of Ohio's hazardous waste laws were found based on this information.*

Ohio EPA cited one additional violation in the May 9, 2012, NOV/PRTC, to Fisher-Titus. Fisher-Titus remains in violation of the following hazardous waste law as outlined in that NOV/PRTC:

Violation	Date Violation Observed
1. ORC Section 3734.02 (F) Unlawful transportation of hazardous waste to an unauthorized facility.	March 29, 2012

No response to this letter is necessary. Should you have any questions, please feel free to call me at (419) 373-3082 or email me at [amber.hicks@epa.ohio.gov](mailto:amber.hicks@epa.ohio.gov).

Sincerely,



Amber M. Hicks  
Division of Materials and Waste Management

/llr

pc: Cindy Lohrbach, DMWM, NWDO  
Colleen Weaver, DMWM, NWDO

ec: Amber Hicks, DMWM, NWDO  
Colleen Weaver, DMWM, NWDO

**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.