



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

January 10, 2013

RE: BRECKSVILLE VA MEDICAL CENTER  
CUYAHOGA COUNTY  
OH7 360 011 467  
NOV

Mr. Don Albaugh  
Engineering Service  
VA Medical Center  
10701 East Blvd.  
Cleveland, Ohio 44106

Dear Mr. Albaugh:

Thank you and David Sabol for accompanying me during Ohio EPA's December 12, 2012, inspection of the Louis Stokes Cleveland VA Medical Center (VA), Brecksville Division, in Brecksville, Ohio. I inspected the Medical Center's laundry building in follow-up to a release of hazardous waste to the environment that occurred there on, or about November 28, 2012.

The VA Medical Center was a veteran's hospital operated by the Veterans Administration. The facility has closed over the previous two years prior to the release and is currently completing Ohio's Cessation of Regulated Operations' process. At the time of the inspection, you indicated that the future status of the complex's buildings is undecided.

The release of hazardous waste resulted in the following violation of Ohio's hazardous waste rules:

**1. ORC § 3734.02(E)&(F), Unlawful Disposal of Hazardous Waste:**

According to Ohio EPA's investigation and statements from VA staff, the release of hazardous waste originated in the idled laundry building as a result of maintenance staff activities intended to "winterize" the closed laundry. The release discharged to a small nearby stream where it was discovered on December 1, 2012, by a local resident and reported to Ohio EPA. The Ohio Division of Natural Resources and Ohio EPA's Emergency Response Section (DERR) responded to the release (spill identification number 1212-18-2866). Initial investigation revealed extremely high pH measurements within the affected stream (some above 12.5). The source was traced back to a 12 inch storm drain, within a culvert, slowly discharging to the stream water with a pH of 11. Up

Mr. Don Albaugh  
VA Medical Center  
January 10, 2013  
Page 2

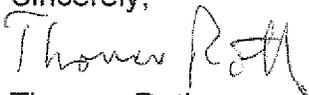
stream of this discharge the pH measured normal (7). Ohio EPA contracted with its emergency response Level of Effort Contractor (Chemtron) for assistance in containing the spill and removal of hot spot areas. The storm drain was suspected to be associated with the adjacent VA Medical Center so that the facility's maintenance supervisor was contacted. The supervisor arrived at the site, allowed access, was interviewed, and stated that he recently winterized the laundry room. The winterizing included emptying two partially full 5,000 gallon above ground tanks located in the laundry; one labeled "NaOH" the other "Caustic", into a floor drain he believed connected to the sanitary sewer. A dye test by Northeast Ohio Regional Sewer District (NEORS) later confirmed that this drain discharged to the storm water drainage system and ultimately the affected stream, not to the sanitary sewer. During the DERR investigation, the maintenance supervisor stated that he believed the tanks contained water so he did not have their contents characterized. The DERR on scene coordinator measured a pH of 13+ for the residual remaining within the tanks.

As a result of the above release to the environment, the VA Medical Center has conducted unlawful disposal of hazardous waste in violation of ORC § 3734.02(E)&(F). No further information is requested at this time.

Due to the nature of the violation, Ohio EPA is considering escalated enforcement action.

Should you have any questions, please feel free to call me at (330) 963-1231. 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,



Thomas Roth  
District Representative  
Division of Materials and Waste Management

TR/cl

ec: Jeff Mayhugh, DMWM, CO  
Nyall McKenna, DMWM, NEDO  
Natalie Oryshkewych, DMWM, NEDO  
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