



**Environmental  
Protection Agency**

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

Re: Richland County  
0370010004  
Stack Test  
HPV-GC8  
**Notice of Violation**

January 13, 2012

CERTIFIED MAIL

Mr. Terry Hall  
MedCentral Health Systems  
335 Glessner Avenue  
Mansfield, Ohio 44903

Dear Mr. Hall:

The stack test conducted on November 8, 2011, on Ohio EPA emissions unit No. N004 (Medical Waste Incinerator), has been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures. Our review confirms the following reported data is accurate:

**Critical Test Data  
(In Three Run Averages)**

Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	Maximum Source Operating Rate <sup>a</sup>
PM	0.03 lb/hr 0.00163 gr/dscf	0.72 lb/hr 0.015 gr/dscf at 7% O <sub>2</sub>	600 lbs waste/hr	600 lbs waste/hr
CO	0 ppm db at 7% O <sub>2</sub>	100 ppm db at 7% O <sub>2</sub>	600 lbs waste/hr	600 lbs waste/hr
HCl	0.63 lb/hr 137.7 ppm db at 7% O <sub>2</sub>	4.0 lbs/hr 100 ppm db at 7% O <sub>2</sub>	600 lbs waste/hr	600 lbs waste/hr

The emissions unit was being operated in violation of its allowable emissions rate for HCl (violation of the Title V term and condition (C)(4)(b)(1)(c), OAC rule 3745-75-02, and Ohio Revised Code 3704.05). It will therefore be necessary to retest this unit or take other appropriate action to achieve compliance with the applicable emission limitation. However, Ohio EPA is aware that the unit was retested on December 20, 2011, and we await the results of that test.

<sup>a</sup> Maximum Source Operating Rate (MSOR) is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

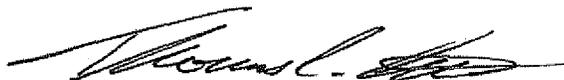
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This office is requesting that the facility submit a written response to this letter which includes, at a minimum, a compliance plan and schedule. The facility is required to submit this information by no later than February 15, 2012.

Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If you have any questions concerning this letter, please feel free to call me at (419) 373-3137 or contact me via e-mail at [thomas.cikotte@epa.state.oh.us](mailto:thomas.cikotte@epa.state.oh.us).

Sincerely,



Thomas C. Cikotte  
Division of Air Pollution Control

/l/r

pc: Thomas C. Cikotte, DAPC-NWDO  
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