



July 15, 2025

Karim Baroudi
Health Commissioner
Toledo Lucas Co. Health
Department
635 N. Erie St.
Toledo, Ohio 43624

**Re: Toledo Lucas County Health Department
Director's Authorization
Approval
Health District Partners
Lucas County
HD4800**

**Subject: Placement on the Director's Approved Lists
Solid & Infectious Waste Programs
Construction & Demolition Debris Programs**

Dear Mr. Baroudi:

On May 9, 2025, the Ohio Environmental Protection Agency (Ohio EPA) completed its annual survey of your health district regarding your Solid and Infectious Waste Programs and Construction and Demolition Debris Programs in accordance with Ohio Administrative Code (OAC) Rule 3745-37-08. The annual survey included the time period between May 16, 2024, and May 9, 2025.

Upon review of the survey findings, I have determined that the Toledo-Lucas County Health Department is in substantial compliance, and I hereby place the Toledo-Lucas County Health Department on my approved lists of health districts authorized to administer and enforce the solid and infectious waste and construction and demolition debris laws and rules in accordance with Sections 3734.08 and 3714.09 of the Ohio Revised Code (ORC).

Additionally, you are hereby notified that this action of the director is final and may be appealed to the Environmental Review Appeals Commission pursuant to ORC Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the director's action. The appeal must be accompanied by a filing fee of \$70.00 made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the

Toledo-Lucas County Health Department

Director's Authorization

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Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission

30 East Broad Street, 4th floor

Columbus, Ohio 43215

I consider our agencies regulatory partners and appreciate the efforts of your dedicated staff. The role your agency plays is invaluable to the effectiveness of achieving our shared mission of protecting public health and the environment. If, at any time, Ohio EPA can provide assistance to support these programs, please encourage your staff to contact the Division of Materials and Waste Management.

Enclosed, please find a copy of the annual survey evaluation report for your health district, which includes an assessment of administrative and field activities. If you have questions or comments regarding the manner in which our agencies administer these programs, please contact me or Joe Goicochea, Chief of the Division of Materials and Waste Management.

If you have any questions concerning this letter, please contact Chelsea Bray of Ohio EPA by telephone at 419.373.3076.

Sincerely,



John Logue

Director

ec: Brian Dearth, DMWM
 Mike Reiser, DMWM
 Jeremy Carroll, DMWM
 Brittni Bahr, DMWM
 Kristin Tillison, DMWM

Attachment: Annual Survey Evaluation Report



Annual Survey Evaluation Report

Ohio EPA's Delegation of the Solid and Infectious Waste and Construction and Demolition Debris (C&DD) Programs to Local Health Districts

Health District: Toledo-Lucas County Health Department

Survey Period:

Core ID: 134955

Start Date: May 16, 2024

Secondary ID: HD4800

End Date: May 9, 2025

HC Email: Baroudi.k@co.lucas.oh.us

Ohio EPA Inspector: Chelsea Bray

Administrative Review

A health district either meets program requirements (Y), does not meet program requirements (N), or requirements are not applicable (N/A). Upon review of health district records and other documentation, Ohio EPA made the following conclusions:

	Solid and Infectious Waste			Construction and Demolition Debris		
	Y	N	N/A	Y	N	N/A
Ohio Administrative Code (OAC) Rule 3745-37-08(C)(1) and (D)(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Applications for licenses are on file for each licensed solid waste, infectious waste treatment, or construction and demolition debris facility in the health district.						
OAC Rule 3745-37-08(C)(2) and (D)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Applications are properly completed with all required information						
OAC Rule 3745-37-08(C)(3) and (D)(3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
All known solid waste, infectious waste treatment, and C&DD facilities operating in the health district do hold valid and unexpired licenses.						
OAC Rule 3745-37-08(C)(4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
No license has been issued for any new solid waste or new infectious waste treatment facility prior to the director's issuance of required permits and approval of detail plans.						
OAC Rule 3745-37-08(C)(5) and (D)(4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Certification of inspection and compliance has been made to the director within thirty days after issuance of any license						

	Solid and Infectious Waste			Construction and Demolition Debris		
	Y	N	N/A	Y	N	N/A
OAC Rule 3745-37-08(C)(6) and (D)(5)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The health district inspects solid waste, infectious waste treatment, and C&DD facilities with sufficient frequency to ensure substantial compliance.						
OAC Rule 3745-37-08(C)(7) and (D)(6)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The health district maintains a file of information relating to each licensed solid waste, infectious waste treatment, and C&DD facility throughout each facility's operation and applicable closure periods. Each file includes applications for licenses, certification records, inspection records, approved plans, litigation information (except that privileged by the attorney-client relationship), and other pertinent information.						
OAC Rule 3745-37-08(C)(8) and (D)(7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The health district undertakes appropriate actions against persons whenever necessary to bring about substantial compliance with Chapters 3734. and 3714. of the Revised Code and rules adopted thereunder.						
OAC Rule 3745-37-08(C)(9) and (D)(8)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The health district takes immediate action to abate serious hazards to the public health resulting from violations of Chapters 3734. and 3714. of the Revised Code and rules adopted thereunder.						
OAC Rule 3745-37-08(C)(10) and (D)(9)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The health district complies with applicable facility licensing procedures.						
OAC Rule 3745-37-08(C)(11) and (D)(10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The health district seeks legal assistance from appropriate state and local agencies as necessary to carry out its assigned responsibilities.						
OAC Rule 3745-37-08(D)(11)				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Each health district staff person possesses either a registered environmental health specialist or environmental health specialist-in-training certificate, the equivalent educational background required, or two years adequate work experience inspecting waste facilities.						
OAC Rule 3745-37-08(D)(12)				<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The health district maintains a file of information relating to each C&DD exemption and license special term/condition. The file includes a copy of each exemption order issued and each license issued that contains special terms and/or conditions, as well as the health district's written justification for each action.						

Comments

OAC Rule 3745-37-08(D)(2) and (D)(3): The Health Department continues to work with the owner/operator to ensure an accurate and complete license application is received. Creekside landfill is operating under their 2024 license, as provided by Ohio law. Both the Health Department and Facility have been in contact with Ohio EPA and are continuing to work on completing the 2025 license.

OAC Rule 3745-37-08(C)(8) and (D)(7):

The health department referred one case for enforcement action during the survey period, Beebe Scrap Tire Site, which is currently in progress as an enforcement case with Ohio EPA. The health department notifies facility operators and landowners in writing of observed violations and perform follow-up inspections until violations are abated. During the annual survey period, there were nine complaints received by the health department managed under Ohio Revised Code (ORC) 3734.

OAC Rule 3745-37-08(C)(9) and (D)(8):

No serious public health hazards resulting from violations of the solid and infectious waste rules were on record for this survey year.

Additional Comments:

The health district records indicate that Toledo-Lucas County Health Department conducted the required number of comprehensive inspections of all operating facilities during the survey period.

Facility and Inspection Inventory			
Facility Name	Facility Type and Minimum Inspection #	Inspections Completed	
		Comprehensive	Other
Hoffman Road Landfill	MSW Landfill (4)	6	0
Creekside Landfill	C&DD Landfill (4)	7	1
Stericycle, Inc.	IW Treatment Facility (4)	6	0
Allgreen	Composting Facility (Class IV) (1)	1	0
Blue Creek	Composting Facility (Class III) (1)	1	0
Bauer Lawn Maintenance, Inc.	Composting Facility (Class IV) (1)	1	0
City of Toledo	Composting Facility (Class IV) (1)	1	0
CWR Inc. Recycling Facility	Composting Facility (Class IV) (1)	1	0

Toledo-Lucas County Health Department

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Springfield Compost (formerly Denker Properties)	Composting Facility (Class IV) (0)	1	0
Lake Erie Tree Service (Formerly Down 2 Earth)***	Composting Facility (Class IV) (1)	1	0
Florandscape	Composting Facility (Class IV) (1)	1	0
Oregon City Compost	Composting Facility (Class IV) (1)	1	0
Riverside Disposal	Composting Facility (Class IV) (1)	1	0
Sylvania Compost & Recycling	Composting Facility (Class IV) (1)	1	0
Toledo Zoo	Composting Facility (Class IV) (1)	2	0
Toledo Top Soil & Mulch*	Composting Facility (Class IV) (1)	0*	0

*Site has denied access for health department, and Ohio EPA has sent two NOV's regarding the annual report not being submitted. Health department and Ohio EPA continue to try to contact facility owner/operator.

*** Lake Erie Tree Service name change effective on March 26, 2024, amended registration.

Field Survey

Ohio EPA's field survey evaluation is focused on the health district inspector's familiarity with program rules and policies, the ability to recognize and document violations, and the thoroughness of communication with an owner/operator.

Facility Type: Class IV Composting Facility

Facility Name: Bauer Lawn Maintenance, Inc.

Location: 10839 Sager Rd., Swanton

Inspection Type: Comprehensive

Facility Representative(s): Craig Bauer

Health District Inspector(s): Lauren Stein

Ohio EPA Inspector(s): Chelsea Bray

Date: May 2, 2025

Findings/Recommendations:

Ms. Stein demonstrated knowledge of class IV compost facility regulations. She used the *Class IV Composting Inspection Checklist* as a guide and took notes to document observations. Ms. Stein noted the following:

- The facility had a valid registration, reviewed the daily logs, and noted that the daily logs were complete.

- Signage, the limit of access during non-business hours, storage piles, and compost windrows. There was no solid waste in the compost windrows.
- There was ponding during the time of inspection, however, there was heavy rain prior to the inspection, and Ms. Stein advised the facility to regrade the materials placement area.

No violations were observed during the time of the inspection.

Ms. Stein summarized her findings of the site visit to Ohio EPA at the time of inspection. Ohio EPA acknowledged the inspector's findings and made no additional recommendations. After receiving and reviewing a copy of the inspection letter dated May 14, 2025, Ohio EPA determined that the inspector adequately documented the inspection on May 2, 2025.

Facility Type: C&DD Landfill

Facility Name: Creekside Landfill

Location: 4242 Creekside, Toledo, Ohio

Inspection Type: Comprehensive

Facility Representative(s): Bill Garner

Health District Inspector(s): Lauren Stein

Ohio EPA Inspector(s): Chelsea Bray

Date: May 9, 2025

Findings/Recommendations:

Ms. Stein demonstrated knowledge of Construction & Demolition Debris (C&DD) Landfill facility regulations. She used the *Construction & Demolition Debris Landfill Inspection Checklist* as a guide and took notes to document observations. Ms. Stein observed the following:

- The unloading zone, the working face, the surface water control ditches, the cell walls, cell floor, the access roads, and daily logs were inspected and were compliant at the time of inspection.
- Erosion on the north, east and south slopes, as well as a large buildup of soil around leachate pump #2 and leachate pump #1 due to the erosion on the south slope. Ms. Stein suggested focusing on surface water run-off and slope erosion in this area.
- Hydrogen sulfide odor was present on the west side of Cell 2. Recommendations were made to continue monitoring this odor and notify the health department if it continues.
- Dust was significant at the time of inspection, the facility has a water truck that could not reach certain areas of the facility such as the haul road slope, where the dust was generated. Facility stated they will maintain proper dust management equipment on-site, no new equipment at time of inspection.
- Cell 3 slope interior adjacent to the working face was not adequately covered, additionally blown litter was observed along the rail lines, Ms. Stein suggests covering or picking exposed debris.
- Leachate pump #1 was down due to electrical issues. *Mr. Garner documented that leachate pump #1 was in operation again on May 15, 2025. Leachate level was above compliance at 48.6 inches when the pump was restarted.*

The following violation was observed:

- **OAC Rule 3745-400-11(B)(3).** OAC Rule 3745-400-11(B)(3) states that “the owner or operator shall comply with the applicable construction specifications and standards contained in rule 3745-400-07 of the Administrative Code.” OAC Rule 3745-400-07(F)(2)(b) states that the facility environs shall contain plan drawings that include “the location of all existing or proposed maintenance buildings, weighing facilities, storage buildings and other structures within the facility boundary.”

The facility has moved the scale and associated office trailers to a location off Lagrange Street. The approved 2023 license has the proposed scale building located off Creekside Avenue. Facility does not have an approved 2024 license at this time and is required to complete all work within the scope of the 2023 license until the time that any changes proposed in the 2024 license have been approved by the licensor.

Ms. Stein summarized her findings of the site visit to Ohio EPA at the time of inspection, Ohio EPA acknowledged the inspector's findings and made no additional recommendations. After receiving and reviewing a copy of the inspection letter dated May 20, 2025, Ohio EPA determined that the inspector adequately documented the inspection on May 9, 2025.

Facility Type: MSW Landfill

Facility Name: Hoffman Road Landfill

Location: 3962 Hoffman Rd., Toledo, Ohio

Inspection Type: Comprehensive

Facility Representative(s): Ryan Murphy

Health District Inspector(s): Lauren Stein

Ohio EPA Inspector(s): Chelsea Bray

Date: May 2, 2025

Findings/Recommendations:

Ms. Stein demonstrated knowledge of municipal solid waste landfill facility regulations. She used the *MSW Landfill Inspection Checklist* as a guide and took notes to document observations. Ms. Stein observed the following:

- Working face, daily cover, alternate daily cover, intermediate cover, final cover, new cell construction, the ditches, sedimentation, basins, access roads, and daily records.
- The facility has a contract for commercial mowing and litter picking (ACES Services, LLC) for 2025. Blown litter was observed on the north and east portions of the site, the facility used the Barber litter picker machine on the side slopes.
- Erosion was observed on the north and east slope of Section 3 and the facility planned on repairing the erosion damage and seeding in May 2025.

No violations were observed during the time of the inspection.

Ms. Stein summarized her findings of the site visit to Ohio EPA at the time of inspection, Ohio EPA acknowledged the inspector's findings and made no additional recommendations. After receiving and reviewing a copy of the

inspection letter dated May 5, 2025, Ohio EPA determined that the inspector adequately documented the inspection on May 2, 2025.

Facility Type: IW Treatment Facility

Facility Name: Stericycle

Location: 1301 E. Alexis Rd., Toledo, Ohio

Inspection Type: Comprehensive

Facility Representative(s): Mike Feathergill, Andy O'Brien, and Don Nuss

Health District Inspector(s): Lauren Stein

Ohio EPA Inspector(s): Chelsea Bray

Date: May 1, 2025

Findings/Recommendations:

Ms. Stein demonstrated knowledge of the infectious waste regulations. She used the appropriate *Infectious Waste Autoclave Facility Inspection Checklist* as a guide and took notes to document observations. Ms. Stein inspected the following:

- Autoclave area, the tub wash area, the receiving dock, the compactor, and the dumpster area. Disposal shipping papers were reviewed and found to be complete. The daily logs were inspected to ensure the validated temperature and pressure were maintained during the treatment cycle.
- Ms. Stein also checked for odors and spills, and noted there were none on the chemotherapy storage trailer or the infectious waste trailer at the dock.
- Observed the exterior fence on the east side of the building is broken and needs repaired. The facility is scheduled with a fencing company for repair work.

Ms. Stein held discussions with facility representatives on the following topics.

- The facilities' interest in adding an additional bin to the autoclave cycle. OAC Rule 3745-570-219 discusses permit and license provisions for an infectious waste treatment facility. Adding an additional bin would be considered a modification. Recommended to continue conversation with Anthony Blevins, Ohio EPA-DMWM, regarding the requirements for approving the use of an additional bin.
- That the infectious waste tonnage reported on the 2024 annual report does not match the monthly tonnages submitted on the 2024 monthly fee returns. The facility shall identify and correct reporting and/or fee return errors.
- Additionally, Ms. Stein addressed the new infectious waste rules with the facility. Ms. Stein noted the Facility was observed with 4.4×10^5 Geobacillus stearothermophilus spores which met the previous rule requirements. The new rules went into effect on April 6, 2025. The facility must obtain the appropriate challenge population of spores and conduct biological challenge testing in accordance with OAC Rule 3745-570-203(E). Facility began the process of reaching out to their spore supplier to obtain the proper spores at time of inspection.

No violations were observed during the time of the inspection.

Ms. Stein summarized her findings of the site visit to Ohio EPA at the time of inspection, Ohio EPA acknowledged the inspector's findings and made no additional recommendations. After receiving and reviewing a copy of the inspection letter dated May 27, 2025, Ohio EPA determined that the inspector adequately documented the inspection on May 1, 2025.

Facility Type: IW Large Generator

Facility Name: ProMedica Laboratories

Location: 660 Beaver Creek Circle, Suite 120, Maumee, Ohio

Inspection Type: Comprehensive

Facility Representative(s): Kim Thomas, Stephanie Twigg

Health District Inspector(s): Lauren Stein

Ohio EPA Inspector(s): Chelsea Bray

Date: May 2, 2025

Findings/Recommendations:

Ms. Stein demonstrated knowledge of the infectious waste regulations. She used the appropriate *Large Infectious Waste Generator Inspection Checklist* as a guide and took notes to document observations. Ms. Stein inspected the following:

- Infectious Waste was placed in approved containers, the storage room was labeled with a biohazard sign, draw areas and lab area had sharps containers that were properly labeled, and shipping papers were on file.

No violations were observed during the time of the inspection.

Ms. Stein summarized her findings of the site visit to Ohio EPA at the time of inspection, Ohio EPA acknowledged the inspector's findings and made no additional recommendations. After receiving and reviewing a copy of the inspection letter dated May 6, 2025, Ohio EPA determined that the inspector adequately documented the inspection on May 2, 2025.

Facility Type: Scrap Tire Facility

Facility Name: Shrader Tire & Oil

Location: 6032 Hagman Rd., Toledo, Ohio

Inspection Type: Comprehensive

Facility Representative(s): Greg Melroy, Lawrence Cope

Health District Inspector(s): Lauren Stein

Ohio EPA Inspector(s): Chelsea Bray

Date: May 2, 2025

Findings/Recommendations:

Ms. Stein demonstrated knowledge of the scrap tire regulations. She used the appropriate *Scrap Tire Generating Business or Operation Checklist* as a guide and took notes to document observations. Ms. Stein inspected the following:

- Scrap tires were observed to be kept in an enclosed trailer behind the building, no scrap tire nuisance conditions were observed at time of inspection.
- The facility uses a registered scrap tire transporter, Entech, Inc., to remove the tires from the site. Shipping papers were observed on file.

No violations were observed during the time of the inspection.

Ms. Stein summarized her findings of the site visit to Ohio EPA at the time of inspection, Ohio EPA acknowledged the inspector's findings and made no additional recommendations. After receiving and reviewing a copy of the

inspection letter dated May 6, 2025, Ohio EPA determined that the inspector adequately documented the inspection on May 2, 2025.

Solid and Infectious Waste Programs Summary

The health department conducts inspections at licensed and registered facilities within its jurisdiction to ensure compliance with the solid and infectious waste regulations.

It is the role of Ohio EPA to provide oversight and education to the health department in each of the programs outlined in this letter. The health department's ability to recognize, identify and cite violations in all program areas, as well as familiarity with the regulations during all types of inspections is critical to complete thorough site evaluations and enforcement of the regulations. The health department staff periodically called or emailed Ohio EPA's staff with any questions within the program areas. Ohio EPA will continue to provide technical assistance to the health department, as necessary. Ms. Stein's knowledge was demonstrated during the survey, she is efficient, and maintains good relationships with facilities.

Construction and Demolition Debris Summary

Ms. Stein shows a good working knowledge of construction and demolition debris (C&DD) rules and maintains open communication with Ohio EPA. The health department will respond to C&DD complaints and cite violations as needed.

Post-Survey Conference

On May 9, 2025, I held a post-survey conference with Lauren Stein, MPH, Registered Environmental Health Sanitarian (REHS) to summarize the annual survey findings due to limited availability of management. Jodi Vaughan, supervisor of Food-safety division and Jennifer Gottschalk, Environmental Health Director, were contacted in regard to the post-conference survey by Ms. Stein. Ms. Gottschalk was comfortable with forgoing the post-survey conference. Ms. Stein briefed Ms. Gottschalk on the post-conference survey. During the post-survey conference, we discussed the health department's compliance with ORC Sections 3734.08 and 3714.09. Additionally, I shared my intention to recommend the health district remain on the approved lists.

Toledo-Lucas County Health Department

Annual Survey Evaluation Report

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This Annual Survey Evaluation Report is for internal use to perform a preliminary assessment of approved health districts. It is not to be used as an indication of a health district's overall compliance with OAC Rule 3745-37-08, which is a determination of the director of Ohio EPA. This Report and any accompanying information will be forwarded to the director for consideration and to determine substantial compliance with OAC Rule 3745-37-08.

____ Chelsea Bray _____

July 2, 2025

Signature

Date

Chelsea Bray
Environmental Specialist II
Division of Materials and Waste Management