

# Hazardous Waste Enforcement: U.S. Environmental Protection Agency and New Jersey Medical Hospital Operator Enter into Consent Agreement



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The United States Environmental Protection Agency (“EPA”) and Lourdes Health System (“LHS”) entered into a June 30th Consent Agreement and Final Order (“CA”) addressing alleged Resource Conservation and Recovery Act (“RCRA”) violations. See Docket Number: RCRA-02-2017-7103.

The CA describes LHS as an owner and operator of:

... medical hospitals/institutions engaged in the business of diagnosing and treating medical illnesses and diseases with a full range of services such as obstetrics, operating rooms, same day surgery, pediatrics, imaging and diagnostics, and cardiology.

LHS is stated to own and operate hospitals in Camden, New Jersey and Willingboro, New Jersey.

The LHS hospitals are described as RCRA hazardous waste generators.

EPA is stated to have conducted an inspection of the two New Jersey facilities on April 17, 2015 and July 9, 2015 to determine their compliance with Subtitle C of RCRA and its implementing regulations. Also referenced is documentation submitted by LHS to EPA in response to an inspection and information provided to the company in response to an EPA Information Request Letter and Notice of Violation.

EPA is stated to have issued a Complaint alleging that LHS at the time of the previously referenced inspections or at times prior thereto had failed to:

- Make hazardous wastes determinations for certain waste found at its Camden facility
- Have hazardous permits or meet conditions necessary to accumulate hazardous waste without having obtained a permit or qualifying for interim status at both its Camden and Willingboro facilities, and that these failures were violations of RCRA rules

A civil penalty of \$30,000 is assessed to LHS.

[A copy of the CA can be downloaded here.](#)