



Environmental
Protection Agency

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

August 24, 2011

148123

Ms. Susan Hileman
Tri County ENT
752 Waycross Road
Cincinnati, OH 45240

Re: Tri County ENT, Infectious Waste Notice of Violation (NOV), Warren County,
Reg # 31-G-01296

Dear Ms. Hileman,

On August 23, 2011, I visited Tri County ENT located at 7450 Mason - Montgomery Rd., Mason, Ohio, to conduct a "Large Generator of Infectious Waste" inspection. The purpose of the inspection was to determine compliance with applicable State of Ohio Infectious Waste regulations, Ohio Administrative Code (OAC) Rules 3745-27-30, 33, 34, 35 and 36.

During my visit, I conducted a full facility inspection, which included but was not limited to; review of the shipping papers, infectious waste segregation, sharps containers, packaging of infectious waste, and infectious waste storage areas.

The following violations were documented as a result of the inspection. The violations are prefaced by the appropriate Ohio Administrative Code (OAC) citation.

1) Spill Containment / Cleanup procedures OAC 3745-27-30 (A)(11)(e)

-This regulation states in part:

Ensure that clean-up materials / kits are available in those areas designated in the spill containment and clean-up procedures. Materials utilized in the clean-up of a spill of infectious waste shall include but are not limited to:

- (a) Materials designed to absorb spilled materials;
- (b) A U.S. EPA registered hospital disinfectant that is also a tuberculocidal, for a contact time as specified by the manufacture, an unexpired dated stabilized bleach product that is a U. S. EPA registered hospital disinfectant that is also a tuberculocidal, for a contact time as specified by the manufacturer, or materials necessary

to prepare a minimum 10 per cent sodium hypochlorite solution prepared immediately prior to use with a minimum of thirty minutes of contact time with the waste;

- (c) Red or biohazard labeled bag(s) as specified in paragraph (a) of rule 3745-27-34 of the Administrative Code;
- (d) Latex gloves, or equivalent type of glove, and any other personal protective equipment necessary to implement the spill containment and clean-up procedure; and
- (e) A first aid kit, unless emergency medical care is available on the premises, boundary tape, and other appropriate safety equipment.

- During my inspection, it was determined that Tri County ENT did not have a spill kit on site.

2) Spill Containment / Cleanup Procedures OAC 3745-27-30 (A)(10)

-This regulation states in part:

"Develop a spill containment and clean-up procedure. A copy of the procedure shall be posted or readily available on the premises to persons likely to handle infectious waste, including janitorial services. The name, address, and telephone number of the infection control manager or the infectious waste control manager and their backup, along with the location of all spill containment and clean-up materials / kits at the facility, shall be listed at the top of the spill containment and clean-up procedure."

- During my visit, it was determined that Tri County ENT did not have established cleanup procedures that were readily available to persons likely to handle infectious waste.

3) Shipment of infectious wastes OAC 3745-27-30 (A)(9)

-This regulation states in part:

"Ensure that all infectious wastes, whether treated or untreated, that are transported off the premises where they are generated are accompanied by a shipping paper that meets the requirements of rule 3745-27-33 of the Administrative Code;

- *During my visit, it was determined that Tri County ENT did not have any shipping papers to show that infectious waste was properly shipped off site.*

4) Storage of Infectious Waste OAC 3745-27-35(A)(3)

-This regulation states in part:

"Designate infectious waste storage areas. Those storage areas that are not locked, shall be visibly labeled with a sign stating "warning: infectious waste" and/or displaying the international biohazard symbol at all points of access;"

- *During my visit, it was determined that Tri County ENT was storing infectious waste in a storage area that was not properly labeled.*

Please correct the violations immediately and submit documented proof of the correction within thirty (30) days of the date of this letter.

Failure to list specific deficiencies in this correspondence does not relieve you from complying with all applicable Solid and Infectious waste rules and regulations.

Should you require any technical or regulatory assistance, please feel free to contact me at (937) 285-6648.

Sincerely,



Pat Willoughby
Division of Materials and Waste Management
Southwest District Office

PW/uf

cc: DMWM/SWDO file