



State of Ohio Environmental Protection Agency

**Southwest District Office**

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Dayton, Ohio 45402

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

February 12, 2007

137337

Mr. Don Roush  
UVMC  
3130 North Dixie Highway  
Troy, Ohio 45373

**RE: STANFIELD PLACE, 31 STANFIELD ROAD, TROY, OHIO**

Dear Mr. Roush:

On February 7, 2007, I conducted a large generator of infectious waste inspection at the above mentioned facility in the presence of Mary Ann Timmerman and yourself. This inspection was conducted in order to determine compliance with Ohio Administrative Code (OAC) 3745-27, specifically rules governing large generators of infectious waste. Violations and comments are documented in this letter.

1. During the inspection the following areas were inspected: Lab, Suite 202 and Suite 301.
2. Upon review of the facilities infectious waste shipping papers, two (2) white shipping papers showing proof of treatment were not present and UVMC has not contacted Ohio EPA to inform us of work they have done to locate the missing forms and loads of infectious waste. The date of the shipping papers missing the returned white copy were picked up April 6, 2006 and October 24, 2006. Not taking action to locate the missing infectious waste and not contacting Ohio EPA is a violation OAC Rule 3745-27-33(B)(6), which states in part:

*The treatment shipping paper shall accompany the shipment of untreated infectious wastes that are described on the shipping paper. The treatment shipping paper shall be used when a shipment of infectious waste is transported to an infectious waste treatment facility that is not owned or operated by the generator of the infectious waste. The treatment shipping paper shall:*

*Be returned to the generator within forty-five days of treatment of the waste at a treatment facility. If the copy is not returned then a legible copy of the original shipping paper and a brief letter outlining the generator's efforts to locate the waste shall be submitted to the board of health having jurisdiction and to the Ohio EPA.*

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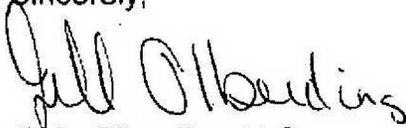
Please provide Ohio EPA with information on your attempt to locate the treatment shipping papers.

3. Spill kits and spill procedures were available in each area noted above.
4. UVMC needs to provide Ohio EPA with a list of all the facilities in the building and state which facilities UVMC are responsible for. Please amend your large generator of infectious waste registration by stating specific suites in the building that are to be included on the registration.

Please respond in writing within fourteen days of receiving this correspondence. A re-inspection will be conducted.

Thank you for taking the time to complete the inspection. If in the future you have any questions, please contact me at (937)285-6094.

Sincerely,



Jill L. Olberding, R.S.  
Division of Solid and Infectious Waste Management

JLO/br