

**Environmental  
Protection Agency**

Tim Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

August 31, 2010

Don Roush  
Director/Plant Operations  
UVMC  
3130 N. Dixie Highway  
Troy, Ohio 45373

137348

**RE: OUTPATIENT CARE CENTER NORTH, PIQUA, OHIO**

Dear Mr. Roush:

On August 25, 2010, I conducted a large generator of infectious waste inspection at the above mentioned facility in the presence of Deanne Rhoades. This inspection was conducted in order to determine compliance with Ohio Administrative Code (OAC) 3745-27, specifically rules governing large generators of infectious waste. The following comments are a result of the inspection:

1. During the inspection, the following areas were inspected: lab, Suite 204 and PT.
2. The spill kit provided in Suite 204 did not contain caution tape. In addition, please be sure that all disinfectants provided in the kit are tuberculocidal. Failure to ensure that a complete IW spill kit is available in those areas designated in the spill containment and clean-up procedures is a violation of OAC Rule 3745-27-30(B)(11) which states:

*All generators need to maintain spill containment and clean-up kits in a readily accessible area. Spill kits shall, at a minimum, consist of:*

- (1) *Material designed to absorb spilled liquids.*
- (2) *An U.S. EPA registered hospital disinfectant that is also tuberculocidal, for a contact time as specified by the manufacturer, a unexpired dated stabilized bleach product that is an U.S. EPA registered hospital disinfectant that is also tuberculocidal, for a contact time as specified by the manufacturer, or materials necessary to prepare a minimum ten per cent sodium hypochlorite solution prepared immediately prior to use with a minimum of thirty minutes of contact time with the waste;*

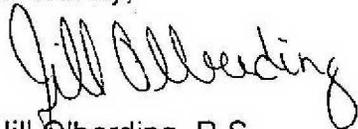
- (3) *Red plastic bags, or other color bags conspicuously labeled with the international biohazard symbol, or sufficient bags to overpack all infectious waste that is spilled and/or ruptured containers. Bags shall meet the ASTM one-hundred and sixty-five gram "Dropped Dart Test" and the twenty-five pound carry test of rule 3745-27-34 of the Administrative Code and are accompanied by seals and labels or have imprinted labels and can be tied or self-sealed. These bags shall be large enough to overpack any box or other container normally used for infectious waste management;*
- (4) *Latex gloves, or equivalent type, and any other personal protective equipment necessary to implement the spill containment and clean up procedure; and*
- (5) *A first-aid kit, fire extinguisher, **boundary tape**, lights, and other appropriate safety equipment.*

3. Personnel in PT had difficulty locating their infectious waste spill procedure. Please be aware that OAC Rule 3745-27-30(B)(10) requires that a copy of the procedure to be posted or readily available on the premises to persons likely to handle infectious waste, including janitorial services.

Compliance with the requirements outlined in this letter shall not relieve you of your obligation to comply with other legal obligations, including, but not limited to, Chapters 3704, 3714, 3734, or 6111 of the Ohio Revised Code or under the Federal Clean Water Act, Clean Air Act, Comprehensive Environmental Response, Compensation, and Liability Act, or Resource Conservation and Recovery Act remedying conditions resulting from any release of contaminants to the environment.

Correction of the violation cited herein is expected to begin immediately. **A re-inspection will be conducted to verify and document your return to compliance with Ohio law. I would like to thank your staff for cooperating in this inspection.** If you have any questions, please contact me at (937) 285-6094.

Sincerely,



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

JO/ka