

**Environmental
Protection Agency**

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

December 9, 2010

Yvonne Tudor
Providence Medical Group
2912 Springboro W Ste 201,
Dayton, Ohio 45439

284143

RE: ^{Practice} **Tippecanoe Family Care, 110 South Tippecanoe Drive, Tipp City, OH**

Dear Ms. Tudor:

On December 2, 2010, I conducted a large generator of infectious waste inspection at the above mentioned facility. 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. A biohazard spill kit was not provided upon request during the inspection. This is violation of OAC Rule 3745-27-30(B)(11)(e), which states in part:

Ensure that clean-up materials / kits are available in those areas designated in the spill containment and clean-up procedures.

Please obtain a spill kit and review the above violated Rule citation to ensure the spill kit contains all the required materials.

2. A spill containment and clean-up procedure was not provided upon request during the inspection. This is a violation of OAC 3745-27-30(B)(10), which states:

*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 infectious waste control manager and their back-up, along with the location of all spill containment and clean-up materials/kits at this facility, shall be listed at the top of the spill containment and clean-up procedure.** Copies of the procedure shall be provided at the request of the board of health with jurisdiction or the director of the Ohio EPA or their authorized representative.*

Please provide a spill procedure which meets the requirements of OAC 3745-27-30(B)(10) and ensure all staff are familiarized of the procedure and its location.

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3. The infectious waste disposal shipping papers were not provided upon request during the inspection. Please match the shipping paper copy, left at your facility by the infectious waste transporter, with the copy returned to your facility documenting treatment of the waste. OAC 3745-27-33(B)(6), requires your facility to take action if the shipping paper is not returned to you within forty-five days of treatment of the waste. Unless you take the time to match the two forms together, you will be unaware if a problem exist.
4. An IW container in the storage room was found overfilled, losing its ability to be properly packaged. The Facility's failure to properly manage and maintain the integrity of packaging for in-use containers is a violation of OAC Rule 3745-257-35(A)(1) which states in part:

Generators shall handle infectious waste containers in a manner and location that maintains the integrity of the packaging.

and a violation of OAC Rule 3745-27-30(B)(3), which states in part:

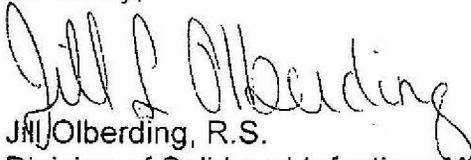
Containers holding infectious wastes shall not be dropped, managed, or transferred in such a manner as to cause damage to the bag or container.

In addition, please be advised that overfilled IW containers are also a problem because IW cannot be compacted per OAC Rule 3745-27-30(B)(4).

5. During the inspection, the room for infectious waste storage was not locked nor was a biohazard symbol emblem on the door. This is a violation of OAC Rule 3745-27-35(A)(2) which requires the door to be locked or visibly labeled with signs and/or international biohazard symbol posted.

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