



State of Ohio Environmental Protection Agency

Southwest District

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Ted Strickland, Governor
Lee Fisher, Lt. Governor
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April 18, 2007

137336 NOV

Don Roush
UVMC
3130 N. Dixie Highway
Troy, Ohio 45373

RE: HYATT CENTER, 450 N. HYATT STREET, TIPP CITY, OHIO

Dear Mr. Roush:

On April 16, 2007, I conducted a large generator of infectious waste reinspections 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. For reinspection purposes the lab and suite 202 were visited.
2. During the March 13, 2007 inspection it was not made clear that many of the offices have their own infectious waste shipping papers. I was under the impression that the shipping papers reviewed during the March 13, 2007 inspection were the shipping papers for the entire building. However, during the April reinspection it was brought to my attention that offices have separate infectious waste pick ups and are responsible for their own shipping papers. It was stated that this practice has or will cease and that infectious waste will be picked up from the building as a whole with only one shipping paper for the entire building. Please respond with if this is an accurate statement, which offices did or do have their own shipping papers and on what date if applicable will the infectious waste transporter begin picking up the infectious waste for the whole building with only one shipping paper.
3. The shipping papers for the lab and suite 202 were reviewed. Three years worth of shipping papers were not available for inspection. This is a violation of OAC 3745-27-33(B)(3), 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 kept on file for a minimum of three years.

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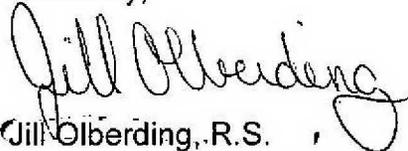
4. Also the shipping papers for the infectious waste from the lab and suite 202 were not being matched up consistently. Please match the shipping paper copy, left at your facility by the infectious waste transporter, with the copy returned to your facility documenting treatment of the waste. OAC 3745-27-33(B)(6), 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. For the lab approximately 12 of the available gold shipping papers were missing the white copy and the facility took no action to verify the waste was treated or to request a copy of the original. This is a violation of OAC 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 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.

5. In the lab the spill procedure and biohazard spill kit were found complete. The violations from the March 13, 2007 inspection were corrected.

A re-inspection will be conducted at this facility in the near future. 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/plh