



State of Ohio Environmental Protection Agency

Southwest District

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Dayton, Ohio 45402-2911

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

June 25, 2007

Tim Landis  
HCF of Piqua Inc.  
1840 West High Street  
Piqua, Ohio 45356

135329 NOV

RE: HCF of PIQUA, 1840 W. HIGH STREET, PIQUA, OHIO

Dear Mr. Landis:

On June 21, 2007, 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. The biohazard spill kit did not contain boundary tape. 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. Materials utilized in the clean-up of a spill of infectious wastes shall include, but are not limited to... A first aid kit, unless emergency medical care is available on the premises, boundary tape, and other appropriate safety equipment.*

2. The infectious waste shipping papers were reviewed and the generator ID number was not proved on the shipping paper. This is a violation of OAC Rule 3745-27-33(B)(2), which states in part that "The treatment shipping paper shall: Be legible and complete."
3. The spill procedure did not contain all required information. 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**

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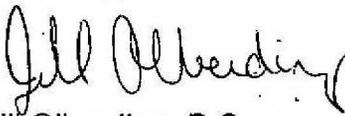
**facility, shall be listed at the top of the spill containment and clean-up procedure.** Copies of the procedure shall be provided at the request of the board of health with jurisdiction or the director of the Ohio EPA or their authorized representative.

Please provide a spill procedure which meets the requirements of OAC 3745-27-30(B)(10).

4. The shipping papers for the infectious waste were not being matched up. 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.

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