



State of Ohio Environmental Protection Agency

Southwest District Office

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May 29, 2007

Dave Crow
Heartland of Piqua
275 Kienle Drive
Piqua, Ohio 45356

RE: HEARLAND OF PIQUA, 275 KIENLE DRIVE, PIQUA, OHIO

Dear Mr. Crow:

On May 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 provided 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 outside infectious waste storage area was found unlocked. This is a violation of OAC Rule 3745-27-35(A)(2), which states in part, "Lock outside storage areas containing infectious wastes containers to prevent unauthorized access."
4. The disinfectant provided in the spill kit stated its active ingredient as Sodium Hypochlorite 0.525%. Please ensure this product meets the Rule requirement for a disinfectant as provided in OAC Rule 3745-27-30(B)(11)(b), which states;

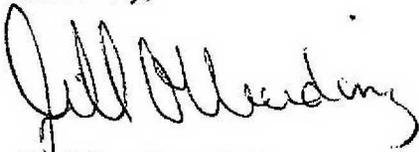
An U.S. EPA registered hospital disinfectant that is also tuberculocidal, for a contact time as specified by the manufacturer, a unexpired dated stablized bleach product that is an U.S. EPA registered hospital disinfectant that is also tuberculocidal, for a contact time as specified by the manufacturer, 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;

[Comment: Household bleach depending upon brand is three to five per cent sodium hypochlorite by volume. A 1:10 dilution of household bleach (one part household bleach to nine parts of water) contains a minimum ten cent volume/volume sodium hypochlorite solution and will produce a solution with 3000-5000 parts per million of free available chlorine.

To make a ten per cent household bleach solution for disinfection, add approximately 6.4 ounces of household bleach to 57.6 ounces of tap water. This yields 1/2 gallon of solution.]

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

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