

ST. BERNARD  
IW



State of Ohio Environmental Protection Agency

Southwest District

401 East Fifth Street  
Dayton, Ohio 45402-2911

TELE: (937)285-6357 FAX: (937)285-6249  
www.epa.state.oh.us

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

**CERTIFIED MAIL**

July 17, 2007

18216  
NOV

Ms. Laura Bommarito  
Procter & Gamble  
F&HCIC Historic Wing  
5299 Spring Grove Avenue  
Cincinnati, Ohio 45217

**Re: Large Generator of Infectious Waste Inspection  
Procter & Gamble, St. Bernard, Hamilton County, Ohio**

Dear Ms. Bommarito:

On June 28, 2007, I met with Mr. Dean Callos to conduct a large generator of infectious waste inspection of Procter & Gamble in St. Bernard. During my visit we performed a full facility inspection, including treatment shipping papers, infectious waste segregation and sharps containers in the Health Clinic, Microbiology and Analytical Labs, infectious waste spill kit procedures and contents in the Health Clinic, dock area, microbiology labs and hazmat cart, infectious waste packaging, and infectious waste storage area. During our inspection the following compliance issues were observed:

1. The infectious waste spill clean-up procedures were in the process of being updated with current contact names. Also, since the Microbiology Labs are no longer being maintained at this site, the facility is also in the process of re-evaluating the number and location of all the infectious waste spill clean-up kits on site. Please ensure that all infectious waste spill clean-up kit procedures contain current and accurate contact personnel and locations.
2. The infectious waste spill clean-up kit in the Historic Wing Dock did not contain an absorbent. This is a violation of Ohio Administrative Code (OAC) Rule 3745-27-30(B)(11)(a) which requires the infectious waste spill clean-up kit to contain materials designed to absorb spilled liquids. Mr. Callos placed paper towels in the kit at that time. Please ensure that all infectious waste spill clean-up kits contain all required clean up materials.
3. Sharp infectious waste such as clear plastic transfer pipets were not consistently being placed in appropriately labeled sharps boxes in the Analytic Labs. This is a violation of OAC Rule 3745-27-34(B) which requires all unused or discarded syringes to be packaged in appropriately labeled containers. These items meet the definition of syringe and therefore must be managed as a sharp. I have enclosed a copy of an interpretation letter written by Ms. Alison Shockley, supervisor of the Infectious Waste Unit. This letter further clarifies the Ohio Environmental Protection Agency's position in determining a syringe/sharp infectious waste.

Ms. Laura Bommarito  
Procter & Gamble  
F&HCIC Historic Wing  
July 17, 2007  
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Please response within thirty (30) days upon receipt of this correspondence regarding your remedy to the above compliance issues.

I would like to thank Mr. Callos for his assistance and cooperation during our inspection. I look forward to working with you in the future. If you have any questions or need additional information, please do not hesitate to contact me at the above letterhead address, or by telephone at (937) 285-6072.

Sincerely,



~~Holly Hillier~~  
Environmental Specialist  
Division of Solid and Infectious Waste Management

cc: James Dean, Miami Valley Laboratories  
Dean Callos, Ivorydale / ITC

HHH/plh



State of Ohio Environmental Protection Agency

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SOUTHWEST DISTRICT

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

COPY OF  
INTERPRETATION  
LETTER

August 25, 1999

Mr. John W. McKinney III  
Director  
Facilities Management Services and Safety Officer  
Middletown Regional Hospital  
105 McKnight Drive  
Middletown, OH 45044-4898

Dear Mr. McKinney:

I am writing in response to your letter of July 31, 1999 regarding the definition of "sharps" as it applies to a bulb syringe that has no visible blood or body fluid contamination. Paragraph (B)(15)(g) of Rule 3745-27-01 of the Ohio Administrative Code (OAC) states that sharp wastes include syringes. OAC Rule 3745-27-30(A)(2)(c) states that all discarded hypodermic needles, syringes, and scalpel blades used by the generator that are not infectious wastes must still be packaged in puncture resistant containers in accordance with OAC Rule 3745-27-34(B)(2). Webster's New World Dictionary, Third College Edition, defines syringe as "a device consisting of a narrow tube fitted at one end with a rubber bulb or piston by means of which a liquid can be drawn in and then ejected in a stream: used to inject fluids into, or extract from, body cavities, to cleanse wounds, etc." Given these rule citations and the dictionary definition, a bulb syringe that is not contaminated with blood or body fluids is not an infectious waste but must still be packaged in a rigid, puncture resistant container that is closed tightly to prevent loss of contents.

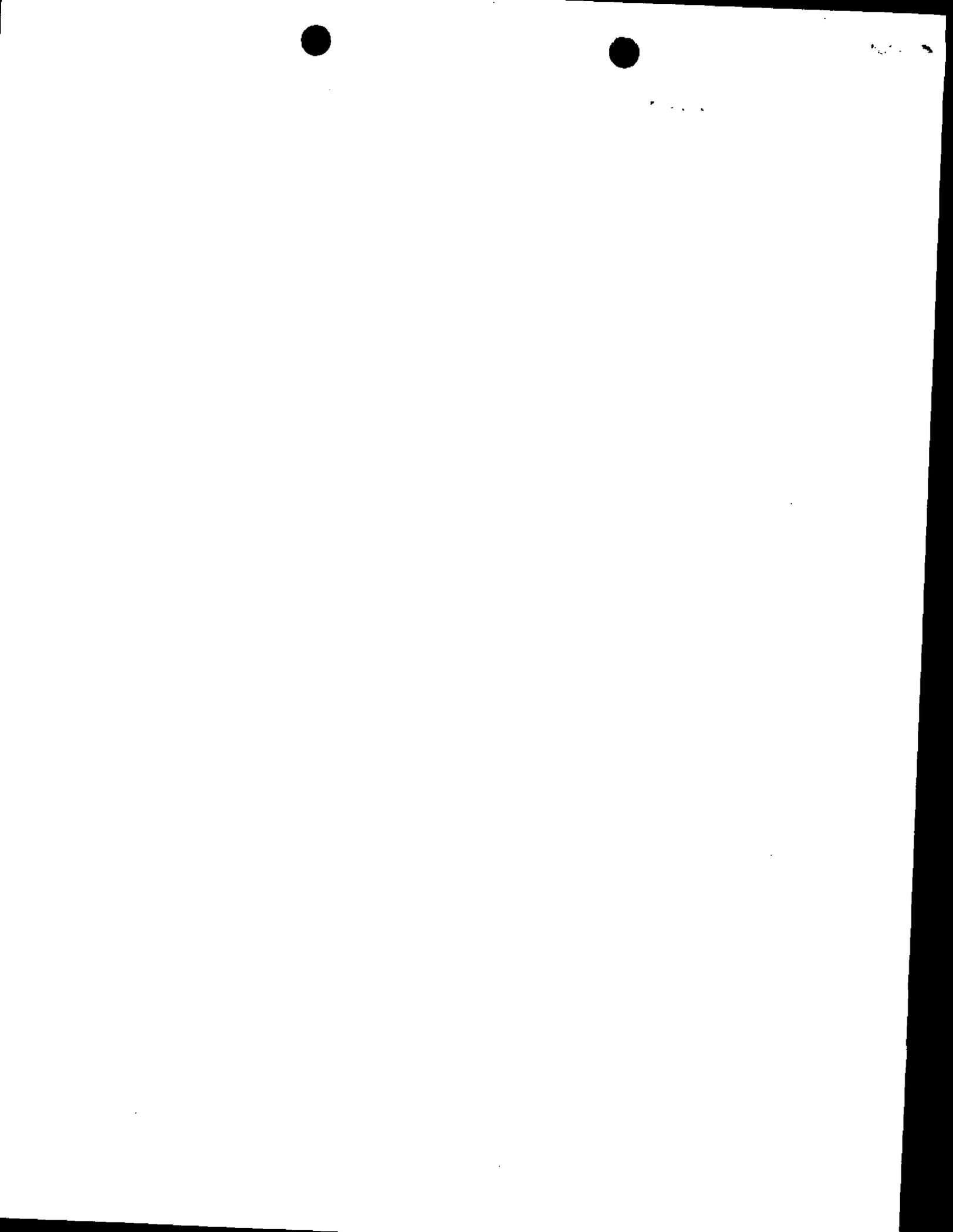
If I may be of any further assistance, please do not hesitate to contact me at the above letterhead address, by e-mail at [alison.shockley@epa.state.oh.us](mailto:alison.shockley@epa.state.oh.us), or by telephone at (614) 728-5335.

Sincerely,

Alison M. Shockley  
Infectious Waste Unit Supervisor  
Division of Solid and Infectious Waste Management

AMS/dk

cc: Holly Hillyer, OEPA-SWDO



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Laura Bommarito  
 Procter & Gamble  
 F + HCIC Historic Wing  
 5299 Spring Grove Ave  
 Cincinnati Oh  
 45217

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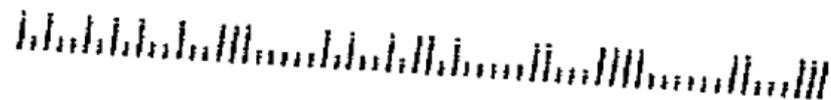
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