



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

April 16, 2011

Ms. Cherie Martin
UC Health Primary Care
5900 West Chester Road, Suite G
West Chester, Ohio 45069

**Re: UC Health Primary Care, Infectious Waste Notice of Violation (NOV), Butler County,
Reg # 09-G-01414.**

Dear Ms. Rodriguez:

On May 16, 2011, I met with you at UC Health Primary Care to conduct a Large Generator of Infectious Waste inspection. The purpose of the inspection was to determine compliance with applicable State of Ohio Infectious Waste regulations, Ohio Administrative Code (OAC) Rules 3745-27-30, 33, 34, 35, and 36.

During my visit, I conducted a full facility inspection, which included but was not limited to; review of the shipping papers, infectious waste segregation, sharps containers, packaging of infectious waste, and infectious waste storage areas.

The following violation was documented as a result of the inspection. All violations are prefaced by the appropriate Ohio Administrative Code (OAC) citation.

1) Spill Containment / Cleanup procedures. OAC 3745-27-30 (A)(11)(e).

-This regulation 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 waste shall include but are not limited to:

- (a) Materials designed to absorb spilled materials;
- (b) A U.S. EPA registered hospital disinfectant that is also a tuberculocidal, for a contact time as specified by the manufacture, an unexpired dated stabilized bleach product that is a U. S. EPA registered hospital disinfectant that is also a tuberculocidal, for a contact time as specified by the manufacturer, or materials necessary to prepare a minimum 10 per cent sodium hypochlorite solution prepared immediately prior to use with a minimum of thirty minutes of contact time with the waste;



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- (c) Red or biohazard labeled bag(s) as specified in paragraph (a) of rule 3745-27-34 of the Administrative Code;
- (d) Latex gloves, or equivalent type of glove, and any other personal protective equipment necessary to implement the spill containment and clean-up procedure; and
- (e) A first aid kit, unless emergency medical care is available on the premises, boundary tape, and other appropriate safety equipment.

- During my inspection, it was determine that UC Health Primary Care did not have roll of boundary tape in the spill kit.

2) Standards for Handling Infectious waste. OAC 3745-27-35 (A)(3).

-This regulation states in part:

Designate infectious waste storage areas. Those storage areas that are not locked, shall be visibly labeled with a sign stating "warning: infectious waste" and/or displaying the international biohazard symbol at all points of access.

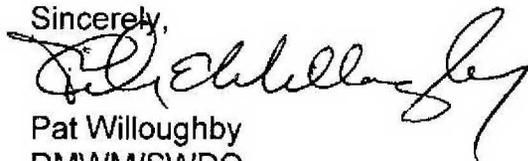
- During my inspection, it was determine that UC Health Primary Care did not lock the door nor have an international biohazard symbol on the door of the infectious waste storage area.

Please correct the violation immediately and submit documented proof of the correction within thirty (30) days of the date of this letter.

Failure to list specific deficiencies in this correspondence does not relieve you from complying with all applicable Solid and Infectious waste rules and regulations.

Should you require any technical or regulatory assistance, please feel free to contact me at (937) 285-6648.

Sincerely,



Pat Willoughby
DMWM/SWDO

cc: DMWM/SWDO file
PW/bp

