



Environmental  
Protection Agency

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

January 14, 2011

Kelly Hughes  
Queen City Physicians Ltd.  
3721 Rossgate Ct.  
Hamilton, OH 45013

RE: **Notice of Violation**

Dear Ms. Hughes:

On January 13, 2011, I conducted a site visit at the Queen City Physicians Ltd., located at 3721 Rossgate Ct., Hamilton, OH 45013. This inspection was conducted in order to determine compliance with Ohio Administrative Code (OAC) Rule 3745-27-30, 33, 34, 35 and 36.

The following violations were noted during the inspection:

1. Treatment shipping papers were not available on the premises. Treatment shipping papers must be available on the premises in order to comply with Rule OAC Rule 3745-27-33 (B)(1)(a), which states in part:

The treatment shipping paper... shall consist, at a minimum, of the following: page one (top copy) shall be white and returned to the generator; the second page (copy two) shall be yellow and kept on file by the treatment facility; the third page (copy three) shall be pink and kept in the transporter's file; and the fourth page (copy four) shall be gold and be **kept in the generator's file**...

2. Three years of treatment shipping papers were not on file at the premises. OAC Rule 3745-27-30 (B)(3), which states that treatment shipping papers must:

**Be kept on file for a minimum of three years;**

3. The infectious waste spill kit did not contain all of the materials necessary to comply with OAC Rule 3745-27-30 (B)(11), 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... **an U.S. EPA registered hospital disinfectant that is also tuberculocidal, for a contact time as specified by the manufacturer, a unexpired dated stabilized bleach product that is an U.S. EPA registered hospital disinfectant that is also tuberculocidal, for a contact time as specified by the manufacturer...**

Kelly Hughes  
Queen City Physicians, Ltd.  
January 14, 2011  
Page 2

4. Three years of treatment shipping papers were not on file at the premises. OAC Rule 3745-27-30 (B)(3), which states that treatment shipping papers must:

**Be kept on file for a minimum of three years;**

5. During the inspection, staff took a sharps container and banged it on a countertop in order to get the sharps to compact and potentially compromise the integrity of the packaging. This is a violation of Ohio Administrative Code (OAC) 3745-27-35 (A)(1) which states:

**Handle infectious waste containers in a manner and location that maintains the integrity of the packaging;**

**Please reply within 14 days of receipt of this letter. I will conduct a follow up inspection.**

If you have additional questions or comments regarding this letter, or need further assistance, please contact me at (937) 285-6647.

Sincerely,

*Monte Bluebaum R.S.*

Monte Bluebaum, R.S.  
Division of Solid and Infectious Waste Management

MB/mab