



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 Kordeski, Director

March 27, 2008

278852

The Knolls of Oxford
6727 Contreras Road
Oxford, Ohio 45056

RE: **Notice of Violation**

Dear Mr. McGowan:

On March 20, 2008, I conducted a site visit at the Knolls of Oxford, located at 6727 Contreras Road, Oxford, OH 45056. 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. The Knolls of Oxford is not registered as an infectious waste generator with the director of the Ohio EPA. The facility must register in order to comply with OAC Rule 3745-27-36 (A)(1), which states in part:

All persons who generate fifty pounds or more of infectious waste in any one month at any one location shall register with the director of Ohio EPA..

2. The infectious waste spill containment and clean-up procedure was missing the name, address, and telephone number of the infection control manager and their backup, along with the location of all spill containment and clean-up materials/kits. These items should be listed at the top. These items must be added in order to comply with OAC Rule 3745-27-30 (B)(10), which states in part:

Develop a spill containment and clean-up procedure...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 facility, shall be listed at the top of the spill containment and clean-up procedure...

Please mail a copy of the corrected spill containment and clean-up procedure to me at the address listed on the letterhead within 14 days of receipt of this letter.

3. The infectious waste spill kit did not contain all of the materials necessary to comply with Rule OAC Rule 3745-27-30 (B)(11), which states in part:

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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,....:

- (a) Materials designed to absorb spilled liquids;
- (b) An U.S. EPA registered hospital disinfectant that is also tuberculocidal... or materials necessary to prepare a minimum ten per cent sodium hypochlorite solution...;
- (c) Red or biohazard labeled bag(s)....;
- (d) Latex gloves, or equivalent type of glove, and any other personal protective equipment...;
- (e) A first aid kit, **unless emergency medical care is available on the premises**, boundary tape, and other appropriate safety equipment...

4. Treatment shipping papers were not complete. The generator ID number was not listed on the treatment shipping. This section must be completed in order to comply with Rule OAC Rule 3745-27-33 (B)(2), which states in part:

Be legible and complete

5. This facility is unregistered. A facility that generates 50 pounds or more of infectious waste in any one month must register in order to comply with OAC Rule 3745-27-36 (a)(1), which states in part:

All persons who generate fifty pounds or more of infectious waste in any one month at any one location shall register with the director of Ohio EPA...

Thank you for your time and consideration during my inspection. If you have additional questions or comments regarding this letter, or need further assistance, please contact me at (937) 285-6647.

Between March 31, 2008 and June 6, 2008, I will be out of the office. Please contact Cheryl Allen for assistance at (937) 285-6650 during this time.

Sincerely,



Monte Bluebaum, R.S.
Environmental Specialist 2
Division of Solid and Infectious Waste Management

MB/plh

