



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Defiance Clinic
Infectious Waste Inspection Results
Generator Registration Certificate #20-G-00378

October 19, 2007

Ms. Shelly Lindsay, Lab Manager
Defiance Clinic
1400 East Second Street
Defiance, Ohio 43512

Dear Ms. Lindsay:

On October 3, 2007, an inspection of the Defiance Clinic (Facility), infectious waste generator number 20-G-00378, was conducted by myself, representing the Ohio Environmental Protection Agency (Ohio EPA). Cathy Franzdorf represented the Facility during the inspection. The purpose of this inspection was to determine if the Facility was in compliance with the infectious waste regulations outlined in the Ohio Administrative Code (OAC) Rule 3745-27.

Treatment Shipping Paper System

The initial phase of the inspection consisted of a review of the treatment shipping paper system. The treatment shipping papers were inspected and found to be in order except for one manifest. The white copy of the May 22, 2007, treatment shipping paper was missing. Please contact Stericycle and obtain a copy of this manifest. Stericycle, transporter number 00-T-00199, transports the infectious waste for off-site treatment.

Spill Kits

The spill kit located in the lab was inspected. All the required components within the spill kit were included in accordance with OAC Rule 3745-27-30(B)(11). The Agency recommends placing an additional spill kit in the inside storage room.

Spill Containment and Clean-up Procedure

The spill containment and clean-up procedure for the Facility was located during the inspection. The infectious control manager and his back-up have changed. The location of the spill kit has also changed. In accordance with OAC Rule 3745-27-30(B)(10), please revise the spill containment and clean-up procedure to include the name, address and telephone number of the infectious control manager and his back-up along with the location of all spill kits.

Infectious Waste Handling

Multiple rooms where infectious waste would be handled were inspected. Sharps containers were available in each area, were properly labeled, and were not overfilled. All sharps containers were filled to a reasonable level, sealed, and taken to the inside storage room. The inside storage room was labeled with the international biohazard symbol. The outside storage room was locked and labeled with the international biohazard symbol.

Upon inspection of the outside storage room, it was noted that six totes of infectious waste were taken to the storage room with the red biohazard bag open. In accordance with OAC Rule 3745-27-34(A)(3), filled bags shall be securely tied or sealed to prevent leakage or expulsion of waste from them during storage, handling, or transport. **The owner/operator of the Defiance Clinic is in violation of OAC Rule 3745-27-34(A)(3) for failure to securely tie or seal filled bags of infectious waste.** Stericycle refused to transport the infectious waste because the bags were not tied or sealed. Ms. Franzdorf tied the bags during the inspection. In the future, please ensure all filled infectious waste bags are tied or sealed before they are moved to the outside storage room.

One tote filled with infectious waste was noted in the hallway adjacent to the inside storage room. According to Ms. Franzdorf, the infectious waste tote was in the hallway waiting for Service Master to take it to the outside storage room. The owner/operator contracts with Service Master to handle their infectious waste. Since the general public has access to this hallway, an unsafe situation is created by storing untreated infectious waste in the hallway. Please revise your storage procedure to ensure all full totes of infectious waste are kept in the storage room until Service Master has the opportunity to haul them to the outside storage room. Please inform Service Master of this change of procedure.

A cardboard box of infectious waste was in the outside storage room. The type of infectious waste inside the box was not designated. Please designate the infectious waste placed in the box as "chemo" or "path" waste. Stericycle will need this designation in order to ensure proper treatment.

The infectious waste from the Defiance Clinic and Mercy Hospital are stored in the same outside storage room. The infectious waste is stored together and both shipments are signed-off by Mercy Hospital personnel. This practice is not acceptable. Mercy Hospital personnel cannot be responsible for the Defiance Clinic's infectious waste. The Defiance Clinic's infectious waste must be manifested separately by Stericycle and signed-off by Defiance Clinic personnel. Please inform Stericycle and the appropriate Defiance Clinic personnel of this change in procedure.

Summary of Inspection Results

1. Obtain the white copy of the May 22, 2007, treatment shipping paper from Stericycle.
2. Place an additional spill kit in the inside storage room.
3. Revise the spill containment and clean-up procedure to include the new infectious control manager and his back-up and the new location of the spill kits.
4. Ensure that full red biohazard bags are tied or secured before they are moved.
5. Do not place full totes in the hallway – Service Master must pick up full totes from inside the storage room.
6. Designate "chemo" or "path" waste on the infectious waste storage boxes.
7. Ensure an employee of the Defiance Clinic signs off on the treatment shipping paper for the Defiance Clinic's infectious waste.

Ms. Shelly Lindsay
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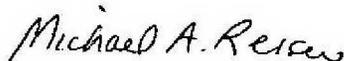
Please respond, in writing, within 14 days indicating the owner/operator's willingness to address the violation and deficiencies noted above. Please fax a copy of the revised spill containment and clean-up procedure to my attention at (419) 352-8468.

Compliance with the requirements outlined in this letter or the solid and infectious waste provisions contained in Ohio Revised Code Chapter 3734 and the rules promulgated thereunder, does not relieve the owner/operator of the Defiance Clinic from their obligation to comply with other applicable state and federal laws and regulations.

This correspondence addresses specific observations only for the areas of the Defiance Clinic office that were inspected. Nothing present in, nor absent from, this correspondence is intended to mean that no other violations existed at the facility at the time of inspection.

Please call me at (419) 373-3126 if you have any questions regarding this letter.

Sincerely,



Michael A. Reiser, R.S.
Environmental Supervisor
Division of Solid & Infectious Waste Management

/cs

pc: Mark Hopper, Mercy Hospital of Defiance
Cathy Franzdorf, Defiance Clinic
~~DSIWM, NWDO File Defiance County, Infectious Waste~~
NWDO Follow-up File