



State of Ohio Environmental Protection Agency

Northwest District Office

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TELE: (419) 352-8461 FAX: (419) 352-8468
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Mercy Hospital of Defiance
Infectious Waste Inspection Results
Generator Registration Certificate #20-G-01367

October 19, 2007

Mr. Mark Hopper
Mercy Hospital of Defiance
1404 East Second Street
Defiance, Ohio 43512

Dear Mr. Hopper:

On October 3, 2007, an inspection of the Mercy Hospital of Defiance (Facility), infectious waste generator number 20-G-01367, was conducted by myself, representing the Ohio Environmental Protection Agency (Ohio EPA). You 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.

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 complete and 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. Please remember to continue to match the white and gold copies to document the infectious waste is treated properly.

The spill kits in the storeroom and PCU were inspected. All the required components within the spill kit in PCU were included in accordance with OAC Rule 3745-27-30(B)(11). The spill kit in the storeroom was missing boundary tape and red biohazard bags. The storeroom spill kit was also placed in an area of the storeroom where it was not readily accessible. Please add boundary tape and red biohazard bags to the storeroom spill kit and locate it in a more accessible area.

The spill containment and clean-up procedure for the Facility was located during the inspection. The name, address and phone number of the infectious control manager and his back-up have changed, but the procedure has not been updated. The locations of the spill kits were not included in the spill containment procedure. These same issues were raised during the 2006 inspection and were never addressed. **The owner or operator of Mercy Hospital of Defiance is in violation of OAC Rule 3745-27-30(B)(10) for failure to update the spill containment and clean-up procedure. The owner or operator will remain in violation of OAC Rule 3745-27-30(B)(10) until the procedure is updated. Please fax a copy of the updated procedure to my attention at (419) 352-8468.**

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It appears that a major update of the Facility's procedures is needed and it also appears that you do not have enough time to dedicate to this task. It may benefit the owner/operator to hire additional staff or delegate this task to other staff personnel.

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 storage room. The main storage room was labeled with the international biohazard symbol and locked. Infectious waste was also being stored in the ER. The storage room in the ER must be labeled with an international biohazard symbol.

This correspondence addresses specific observations only for the areas of Mercy Hospital of Defiance 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.

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 from their obligation to comply with other applicable state and federal laws and regulations.

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

Sincerely,

Michael A. Reiser

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

/cs

pc: ~~DSIWM, NWDO File - Defiance County, Infectious Waste~~