



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

Re: Admirals Pointe Nursing & Rehabilitation  
Infectious Waste Inspection Results  
Generator Registration  
Certificate #18-G-01424

December 3, 2007

Ms. Amy Donaldson  
Admirals Pointe  
1920 Cleveland Road  
Huron, Ohio 44839

Dear Ms. Donaldson:

On November 27, 2007, an inspection of Admirals Pointe Nursing & Rehabilitation (Facility) was conducted by Craig Ward, Anne Reid, and Mark Janowich of the Erie County Health Department, and me, representing the Ohio Environmental Protection Agency (Ohio EPA). Ms. Blanca Lawrence and Mary Willgrube represented the Facility during the infectious waste 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 3745-27-30 through 3745-27-36.

All infectious waste is segregated at the point of generation. Proper sharps containers with labels are being utilized. Segregated infectious waste is immediately taken to one of two soiled utility rooms where it is placed in plastic waste containers that are lined with red biohazard bags. The bags are sealed and taken to the outside storage room which was locked. Ohio EPA recommends that the infectious waste storage shed is labeled with an international biohazard symbol. Infectious waste is shipped off-site for treatment via Accu Medical Waste Services, transporter # 84-T-00260.

The treatment shipping papers were inspected and found to be incomplete and unorganized. At the time of the inspection multiple copies of the white (return copy) sheets were missing for 2007 and one copy of the gold (generator copy) sheet was missing for 2007. Ms. Lawrence stated she had recently taken over responsibility for tracking the shipping papers and she would contact the disposal facilities immediately to obtain copies of the white sheets. Please be advised that OAC Rule 3745-27-33(B)(6) states, in pertinent part, that the white copy "Be returned to the generator within forty-five days of treatment of the waste at a treatment facility. If the copy is not returned then a legible copy of the original shipping paper and a brief letter outlining the generator's efforts to locate the waste shall be submitted to the board of health having jurisdiction and to the Ohio EPA." Furthermore, the shipping papers that were on-site during the inspection did not contain the generator's registration number. OAC Rule 3745-27-33(B)(5) states, in pertinent part, that the shipping papers need to contain the generator's "...registration identification number..." **Therefore, Admirals Pointe Nursing & Rehabilitation is in violation of OAC Rule 3745-27-33(B)(6) and OAC Rule 3745-27-33(B)(5) for failing to maintain copies of complete shipping papers on-site and for failure to ensure shipping papers contain the required information, respectively.** Please ensure shipping papers are filled out completely and are kept on-site in chronological order.

In accordance with OAC Rule 3745-27-30(B)(10), the Facility shall "Develop a spill containment and clean-up procedure. A copy of the procedure shall be posted or readily available on the premises to persons likely to handle infectious waste, including janitorial services. 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." The spill containment and clean-up procedures could not be located during the inspection. Ohio EPA gave Ms. Willgrube a template procedure to utilize for the Facility. **Admirals Pointe Nursing & Rehabilitation is in violation of OAC Rule 3745-27-30(B)(10) for failing to develop and/or have available a spill containment and clean-up procedure.** Please ensure a procedure is developed and/or made readily available.

A spill kit was inspected. The spill kit was missing boundary tape as required by OAC Rule 3745-27-30(B)(11). Please ensure that boundary tape is added to the spill kit(s).

The Facility was unable to locate a copy of the Ohio EPA issued large quantity infectious waste generator certificate for the Facility. Please contact your parent company, Provider Services, to acquire a copy of the certificate.

Please respond to the above cited violations within 14 days of the date of this letter. Your response should include the actions taken to correct each violation. Please submit a copy of the spill containment and clean-up procedure with the response.

This correspondence addressed specific observations only for the areas of Admirals Pointe Nursing & Rehabilitation that were inspected. Nothing present in, nor absent from this correspondence is intended to mean that no other violations existed at the facilities 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 of Admirals Pointe Nursing & Rehabilitation from their obligation to comply with other applicable state and federal laws and regulations.

Please call me at 419-373-3079 if you have any questions regarding this letter.

Sincerely,



Jeremy Scoles, SIT, CHMM  
Environmental Specialist  
Division of Solid and Infectious Waste Management

/llr

pc: Erie County Health Department  
File: Erie County, Infectious Waste