



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Caughman Health Clinic
Infectious Waste Inspection Results
Hancock County

August 28, 2008

Brenda Sciranka
1800 N. Blanchard Street Ste. 121
Findlay, OH 45840

Dear Ms. Sciranka:

On August 21, 2008, the Ohio Environmental Protection Agency (Ohio EPA) conducted an infectious waste inspection at Caughman Health Clinic (Facility). This Facility is a registered large quantity generator of infectious waste and must meet the standards set forth in Chapter 3745-27 of the Ohio Administrative Code (OAC). I represented Ohio EPA and you represented the Facility during the inspection.

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, with the exception of the yellow copy of the April 30, 2008, shipment not being available. The spill containment and clean-up procedure was also reviewed. It was found to be in order and contained all of the required components.

The spill kit was inspected. The kit had all of the required components as outlined in OAC 3745-27-30(B)(11).

The infectious waste storage room was inspected. This represents the only storage area for the Facility. The international biohazard symbol was located on the door and the door was locked. There were two storage totes in the storage area and both were full. One of the totes was overflowing with waste and neither red bag liner was tied off. The waste was putrescent. You indicated the waste was intended to be shipped out on August 6, 2008, by Stericycle. However, due to a merger of Midwest Waste Services (previous transporter) and Stericycle, the waste pick-up was missed. Please be aware that the generator of the waste is responsible for proper storage and for ensuring the waste is disposed of in a timely fashion. Please communicate with Stericycle in order to ensure timely pick-ups.

OAC Rule 3745-27-34(A)(3) states, "Filled bags shall be securely tied or sealed to prevent leakage or expulsion of wastes from them during storage. . ."

OAC Rule 3745-27-35(B)(1) and (2) states, "Maintain infectious wastes in a nonputrescent state, using refrigeration or freezing when necessary;" and "If infectious waste becomes putrescent, then the waste must be immediately refrigerated or frozen and shall be treated and disposed of as soon as possible regardless of any storage time frame;"

Ms. Brenda Sciranka
August 28, 2008
Page 2

The Caughman Clinic is in violation of OAC Rule 3745-27-34(A)(3), OAC Rule 3745-27-35(B)(1), and OAC Rule 3745-27-35(B)(2) for failing to properly store the infectious waste. Ohio EPA received a fax from the Caughman Clinic on August 22, 2008, showing that Stericycle had picked up the infectious waste previously stored at the Facility.

Multiple rooms were inspected for appropriate sharps containers and storage. Sharps containers were available in each area, were properly labeled, and were not overfilled. This correspondence addresses specific observations only for the areas of the Facility 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 the inspection.

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

If you have any questions, please contact me at the Northwest District Office at (419) 373-3079.

Sincerely,



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

/csl

cc: NWDO File: Hancock County, Infectious Waste

cc: Mike Reiser