



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Re: Brown Mackie College
Infectious Waste Inspection Results
Hancock County

October 21, 2010

Mr. Wayne Korpics
1700 Fostoria Avenue, Ste. 100
Findlay, OH 45840

Dear Mr. Korpics:

On September 24, 2010, the Ohio Environmental Protection Agency (Ohio EPA) conducted an infectious waste inspection at Brown Mackie College (Facility), located in Findlay. 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 Ms. Martha Schreiber, Ms. Joyce Ann Paniagua, and Ms. Amy Kinney represented the Facility during the inspection.

The Facility, which consists of a nursing program and allied health program, generates used hypodermic needles and glucose testing lancets. However, the used needles do not come into contact with any type of infectious agents. The needles are used on practice dummies and not on humans. Liquids injected into the dummies and extracted are placebos. The lancets used for glucose testing come into contact with human blood.

The initial phase of the inspection consisted of a review of the sharps generation areas and the infectious waste storage room. Each generation area had the proper sharps containers. The waste storage area was labeled with the international biohazard symbol at all points of access, as required by OAC Rule 3745-27-35(A)(3). However, the two totes used to store the sharps containers were overflowing. The red bags inside the totes should have been tied off signifying that the totes were full. **The owner/operator of Brown Mackie College is in violation of OAC Rule 3745-27-34(A)(3) for failing to tie off filled bags of infectious waste.** Please ensure the bags are tied off when the totes are full and a new tote(s) is put into service.

The spill containment and clean-up procedure was also reviewed. The format and body of this policy was in compliance with the rules. However, not all manuals that were inspected contained the same version of the procedure. Please ensure the procedure is updated as needed and reconciled in all manuals.

A spill containment kit, as required by OAC Rule 3745-27-30(B)(11), was available and being stored in Room 130. The kit contained all the required components.

The shipping papers were inspected and found to be in order, with the exception of the February 4, 2010, generator (white) copy missing. Ohio EPA received a copy of the missing shipping paper on September 27, 2010, from the owner/operator of the Facility. No further action is required.

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The current generator registration certification for Brown Mackie College was readily available during the inspection.

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 Brown Mackie College 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, RS
Environmental Specialist II
Division of Solid and Infectious Waste Management

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pc: ~~File- Hancock County, Infectious Waste~~

ec: Mike Reiser