



Environmental  
Protection Agency

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

Re: Birchaven Retirement Village  
Infectious Waste Inspection Results  
Notice of Violation  
Hancock County

October 28, 2010

Mr. Tim Hamlin  
15100 Birchaven Lane  
Findlay, Ohio 45840

Dear Mr. Hamlin:

On September 28, 2010, the Ohio Environmental Protection Agency (Ohio EPA) conducted an inspection at the Birchaven Retirement Village (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.

A review of the treatment shipping paper system was conducted. The treatment shipping papers were inspected and found to be in order.

The Facility had a spill containment and clean-up procedure for the Facility. OAC Rule 3745-27-30(B)(10) states, " a copy of the procedure shall be posted or readily available on the premises to persons likely to handle infectious waste." During last year's inspection Ohio EPA recommended that a "master" procedure be kept readily available. Furthermore, due to the size of the Facility, multiple copies of the procedure should be distributed to the various wings of the Facility. It was evident during this inspection that no master procedure was generated and not all wings of the Facility were aware of the procedure and where to locate it. Ohio EPA was able to locate one copy of the procedure at the wing E/F nurse's station. The format and body of this policy was in compliance with the rules. **However, the owner/operator of Birchaven Retirement Village is in violation of OAC Rule 3745-27-30(B)(10) for failing to post the spill containment procedure or make it readily available to persons likely to handle infectious waste.**

Multiple spill kits (carts) were inspected. The spill kits are located in the isolation cart of each wing (carts are shared between some wings). The spill kits used at the Facility are small "bag" kits and generally had all of the required components as outlined in OAC Rule 3745-27-30(B)(11). However, Ohio EPA recommends that the Facility look into only utilizing the "blood and bodily fluid clean-up kit, #7353 with disinfectant," manufactured by Impact Products, or equivalent, for all of your spill kits. You previously used these kits on some of your carts.

Mr. Tim Hamlin  
October 28, 2010  
Page 2

These larger kits had more contents than the small "bag" kits. For example, the #7353 kits have an aerosol spray disinfectant included with the kits. The small "bag" kits only have disinfectant wipes. In addition, the spill kits in the isolation carts at wing E/F and G/H were in need of more disinfectant wipes and/or spray and the spill kit in isolation cart I/J was in need of absorbent powder.

The infectious waste storage area was inspected, which is located in the housekeeping storage room. This represents the only storage area for the Facility. The waste was within a cage and the gate was locked at the time of inspection. The area was also labeled with an international biohazard symbol. The area was well maintained.

Multiple accumulation areas were inspected for appropriate sharps containers and storage bins. Each wing of the Facility accumulates infectious waste in the soiled linen rooms before transporting waste to the storage area. Waste handling in these areas appeared to be appropriate on this day.

Sharps containers were available in each area inspected, were properly labeled, and were not overfilled. Please ensure all employees responsible for handling infectious waste understand the proper handling and storage procedures.

A copy of the "Ohio EPA Generator of Infectious Waste Certificate Registration" was located during the inspection. Please keep the certificate readily available at the Facility.

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 the Birchaven Retirement Village from their obligations to comply with other applicable state and federal laws and regulations. Please send a response the above noted violation to my attention within 14 days of the date of this letter at the following address:

Ohio EPA, DSIWM  
347 N. Dunbridge Rd  
Bowling Green, Ohio 43402

Mr. Tim Hamlin  
October 28, 2010  
Page 3

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

/llr

pc: c:\DSIWM-NWDO File: Hancock County, Infectious Waste ;

ec: Mike Reiser