



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: HCF of Fox Run
Infectious Waste Inspection Results
Hancock County

August 17, 2007

Tom Heavrin
2101 Greendale Boulevard
Findlay, OH 45840

Dear Mr. Heavrin:

On August 13, 2007, the Ohio Environmental Protection Agency (Ohio EPA) conducted an inspection at HCF of Fox Run (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. Mr. Mike Summers 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 excellent order. However, the generator registration identification number was not included on the shipping papers from April 28, 2006, to present. OAC Rule 3745-27-33(B)(5)(a) states that the shipping papers shall "Contain, at a minimum...the name, *registration identification number*...of the premises where the wastes were generated." **HCF of Fox Run is in violation of OAC Rule 3745-27-33(B)(5)(a) for failure to ensure all required information is included on the shipping papers.** Please be aware that this same deficiency was noted during the August 22, 2006, inspection. Please ensure the registration identification number is included on all shipping papers. It is requested that a copy of the next shipping paper showing the registration identification number be sent to my attention to verify the violation has been rectified.

The spill containment and clean-up policy was also reviewed. The format and body of this policy was in compliance with the rules.

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

The infectious waste storage rooms were inspected and were labeled with the international biohazard symbol. The outside storage area was also inspected. The doors were locked and the appropriate biohazard label was on the door. All sharps containers inspected were labeled and managed appropriately.

Mr. Tom Heavrin
August 17, 2007
Page Two

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 Fox Run Manor 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, S.I.T., CHMM
Environmental Specialist
Division of Solid and Infectious Waste Management

/lb

cc: ~~File: Hancock County; Infectious Waste~~

Large Generator of Infectious Waste - Inspection Checklist

Generator Name: HCF of Fox Run ID #: _____ Date: 8/13/07 County: Hancock

Generator Address: 2101 Greendale Blvd Findlay Facility Phone #: _____

Operator Name: _____ Operator Phone #: _____

Corporate Address: _____ Corp. Phone # (If Diff.): _____

Health District: City of Findlay Inspector(s): Jeremy Scates

Is this facility being operated in compliance with the following regulations (YES or NO)? Place an X in the appropriate column to denote compliance status. Placing an X in the NO column indicates that a violation has been noted. Write N/A on the lines that are not applicable. This checklist is not all inclusive of regulations applicable to "Large generators of Infectious Waste" operations.

This is a: Comprehensive Inspection Partial Inspection

YES NO

3745-27-30 Standards for Generators

(B) Large Generators

- (1) Segregation at point of generation
- (2) Wastes, other than sharps, in plastic bags
- (3) Sharps in proper containers
- (4) Untreated waste not ground or compacted
- (5) Waste treated or shipped off-site for treatment
- (6) Use registered transporter
- (7) Shipments only untreated waste
- (10) Spill containment / cleanup procedure
- (11) Cleanup materials / kits
- (12) Implement clean up
- (C) All Generators**
- (7) Hazardous / infectious waste mixture
- (8) Radioactive / infectious waste mixture

3745-27-33(B) Shipping Paper System

- (2) Complete and legible
- (3) Shipping papers on file 3 years

3745-27-34 Standards for Packaging

(A) Biohazard bags & Secondary Containers

- (1) Bag specifications
- (2) Impervious to moisture
- (3) Filled bags tied or sealed
- (4) Proper packaging for off-site treatment
 - (a) Biohazard label on 2 sides
 - (b) Good repair, clean, tight covers
 - (c) Reusable containers cleaned & disinfected

(B) Sharps Containers

- (1) Properly labeled sharps container
- (2) Unused, discarded sharps properly packaged
- (C) Containers properly managed

3745-27-35 Standards for Handling Inf. Waste

(A) In-Use and Stored Containers

- (1) Maintain integrity of packaging
- (2) Outside storage areas locked
- (3) Lock or visibly label with signs and/or intl. biohazard symbol posted at all access points
- (4) Contain & clean up spills

(B) Management of Inf. Waste Within Containers

- (1) Maintain non putrescent state
- (2) Putrescent IW refrigerated / frozen & treated ASAP
- (3) Protect from animals & insects
- (4) Spill containment / clean up

YES NO

3745-27-36 Registration Certificates

- (A) Generator certificate # 02 G 00466
- (B) Transporter certificate # T

3745-27-32(E)

Chemical Treatment (cultures)

(E)(1) Approved Method

- (E)(1)(a) Proper strength bleach
- (E)(1)(b) Minimum 20 minute submersion
- (E)(1)(c) Class III and IV prohibition
- (E)(1)(d) Mixed immediately prior to use
- (E)(1)(e) Decanted before disposal

(I) General Facility Requirements

- (I)(5) Operating procedures available
- (I)(15) Shall not treat radioactive waste
- (I)(16) Shall not treat hazardous waste
- (I)(18) Spill containment and clean-up kits
- (I)(18)(b) Appropriate disinfectants
- (I)(19) Clean-up procedure
- (I)(20) Handling treated waste

3745-27-32(F)

Sharps Treatment Heat Encapsulation

(F)(1) Approved Method

- (F)(1)(a) ≥ 70% plastic
- (F)(1)(b) Minimum 30 minutes at 330°F
- (F)(1)(c) Total encapsulation of all sharps
- (F)(1)(d) Only treat sharps
- (F)(1)(e) Residual liquids only

(F)(2) General Facility Requirements

- (F)(2)(a) Daily log/on file 3 years
- (F)(2)(c) Shall not treat cytotoxics
- (F)(3) Quality Assurance**
- (I)(5) Operating procedures available
- (I)(15) Shall not treat radioactive waste
- (I)(16) Shall not treat hazardous waste
- (I)(18) Spill containment and clean-up kits
- (I)(18)(b) Appropriate disinfectants
- (I)(19) Clean-up procedure
- (I)(20) Handling treated waste

Large Generator of Infectious Waste - Inspection Checklist (page 2 of 2)

If Treating Waste on Site, Mark Treatment Method

(1) Sharps Encapsulation (2) Chemical treatment (3) Autoclaving (4) Incineration

Comments:

• registration id # not populated on shipping papers
(4/28/06 - present)

Jeremy Scales

Print Name of Inspector Completing Form

Form: 052-iw_large_gen_ckl.pdf

Jeremy Scales

Inspector's Signature

Revised: November, 1998

12/13/07

Date