



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

Re: Paulding County Hospital  
Infectious Waste Inspection Results  
Generator Registration Certificate #63-G-00071  
Transporter Registration Certificate #63-T-00249

December 14, 2007

Mr. Bud Larimore  
Paulding County Hospital  
1035 Wayne Street  
Paulding, Ohio 45879

Dear Mr. Larimore:

On December 4, 2007, an inspection of the Paulding County Hospital (Facility) was conducted by me, representing the Ohio Environmental Protection Agency (Ohio EPA). You represented the Facility during the infectious waste inspection. The purpose of this inspection was to determine if the Paulding County Hospital 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. Red biohazard bags are being used at the point of generation. The bags are sealed and taken to the storage room which was locked and labeled with the international biohazard symbol. Infectious waste is shipped off-site for treatment via Stericycle. The treatment shipping papers were inspected and found to be complete. A few yellow copies were missing the white, return copies. These shipping papers were approaching the 45 days in which the generator needs to receive them back from the disposal facility. Please ensure all white copies are obtained within the required timeframe.

The spill containment and clean-up procedures were inspected. Policy number IC-235, of the Infection Control Policy Manual, was reviewed and found to be in need of an update. Ensure that the procedure is updated with the correct names, addressees, and telephone numbers of the infection control manager(s) and their backup(s), in accordance with OAC Rule 3745-27-30(B)(10). Ohio EPA made the same request during the previous inspection, conducted on September 6, 2006. **The Paulding County Hospital is in violation of OAC Rule 3745-27-30(B)(10) for failing to adequately maintain a spill containment and clean-up procedure.** Please update the procedure and send Ohio EPA a copy of the procedure within 14 days of the date of this letter. The clean-up procedures listed the location of the spill kits. Multiple spill kits were inspected. Some of the spill kits were missing boundary tape as required by OAC Rule 3745-27-30(B)(11). Please ensure that boundary tape is added to all the spill kits that were missing it.

The Paulding County Hospital is also registered as an infectious waste transporter under the registration number 63-T-00249. The infectious waste from the Facility's satellite (Oakwood Medical Center) is transported to the Paulding County Hospital for storage and then shipped off-site for treatment. In the past, the Facility has picked up the satellite's infectious waste and used shipping papers provided by the final transporter/disposal facility. However, due to a recent change in

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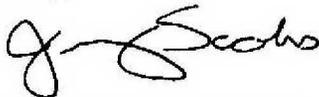
disposal facility, the Paulding County Hospital has not used shipping papers for transportation of wastes from the Facility's satellite locations since June 2007. During the inspection we discussed your options of either generating your own shipping paper system or utilizing your provider's shipping paper system. Regardless of which shipping paper system you implement, there needs to be a record of infectious waste transported from your satellite locations back to the hospital and subsequently to the infectious waste treatment facility. Failure to re-implement a tracking system may result in future violations of OAC Rule 3745-27-33. Furthermore, you stated that you would evaluate the need for the Facility to remain a registered transporter versus having Stericycle take over responsibility of picking up the wastes at the satellite locations.

This correspondence addressed specific observations only for the areas of the Paulding County Hospital 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 the Paulding County Hospital 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

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pc: ~~File: Paulding County Infectious Waste~~