Ohio | Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Midwest Community Health Associates Inc.
Infectious Waste Inspection Results
Generator Registration Certificate #86-G-00024

June 8, 2011

Ms. Krystal Miller
Midwest Community Health Associates Inc.
442 West High Street
Bryan, Ohio 43506

Dear Ms. Miller:

On May 17, 18, and 26, 2011, an inspection of the Midwest Community Health Associates Inc. (MCHA) and its satellites, infectious waste generation number 86-G-00024, was conducted by myself representing the Ohio Environmental Protection Agency (Ohio EPA). The purpose of this inspection was to determine MCHA's compliance with the infectious waste regulations outlined in the Ohio Administrative Code (OAC) Rule 3745-27-30 through 36. The facilities inspected on these days included the Bryan Medical Center, Edgerton Medical Center, Williams County Family Medical Center in Montpelier, and Edon Medical Center.

A review of the infectious waste treatment shipping papers, spill procedure, storage area, sharps containers and spill kits was conducted at all locations.

Bryan Medical Center – 442 West High Street - Bryan

Ms. Lou Ann Counts represented MCHA for the inspection conducted on May 17, 2011. All infectious waste is segregated at the point of generation. Proper sharps containers with labels are being utilized. The storage room was labeled with the international biohazard symbol. The treatment shipping papers were inspected and found to be well organized. However, the February and July 2010 "white" copies of the shipping papers were missing. Please ensure your infectious waste transporter is contacted to obtain copies of these missing documents. Furthermore, the incorrect generator registration number has been used on the shipping papers since March 2010. OAC Rule 3745-27-33(B)(2) states that the shipping papers "be legible and ***complete***." As the generator of the infectious waste, the owner/operator is responsible for ensuring that all information on the shipping papers is accurate and complete before signing. **The owner/operator of Bryan Medical Center is in violation of OAC Rule 3745-27-33(B)(2) for failing to ensure the shipping papers are accurate and complete.** Since your infectious waste transporter provides pre-printed shipping papers, it is your responsibility to ensure the pre-printed information is correct before signing them.

The spill containment and clean-up procedure listed the location of the spill kits in accordance with OAC Rule 3745-27-30(B)(10). Multiple spill kits were inspected and contained all the required components in accordance with OAC Rule 3745-27-30(B)(11).

Stryker Medical Center – 109 North Defiance Street - Stryker

This facility appears to have been closed since June 19, 2010. Please investigate the need to update your registration certificate to remove this facility from the list of satellites.

Edgerton Medical Center – 324 West Vine Street - Edgerton

Ms. Pam Taylor represented the facility for the inspection conducted on May 18, 2011. All infectious waste is segregated at the point of generation. Proper sharps containers with labels are being utilized. The storage room was labeled with the international biohazard symbol. The treatment shipping papers were inspected and found to be well organized. However, the incorrect generator registration number has been used on the shipping papers since March 2010. OAC Rule 3745-27-33(B)(2) states that the shipping papers "be legible and ***complete***." As the generator of the infectious waste, the owner/operator is responsible for ensuring that all information on the shipping papers is accurate and complete before signing. **The owner/operator of Edgerton Medical Center is in violation of OAC Rule 3745-27-33(B)(2) for failing to ensure the shipping papers are accurate and complete.** Since your infectious waste transporter provides pre-printed shipping papers, it is your responsibility to ensure the pre-printed information is correct before signing them. Furthermore, please ensure that the "white" copies of the shipping papers are returned to the facility from the Bryan office in a timely manner. The "white" copy of the February 21, 2011, shipping paper was still in the Bryan office.

The spill containment and clean-up procedure was reviewed and found to be complete, in accordance with OAC Rule 3745-27-30(B)(10). The spill kits were inspected and contained all the required components in accordance with OAC Rule 3745-27-30(B)(11).

Williams County Family Medical Center - 935 Snyder Avenue - Montpelier

Ms. Shera Norrick represented the facility for the inspection conducted on May 18, 2011. All infectious waste is segregated at the point of generation. Proper sharps containers with labels are being utilized. The storage room was labeled with the international biohazard symbol.

The spill containment and clean-up procedures did list the location of the spill kits in accordance with OAC Rule 3745-27-30(B)(10). The spill kits were inspected and contained all the required components in accordance with OAC Rule 3745-27-30(B)(11).

The treatment shipping papers were inspected and found to be well organized. However, the incorrect generator registration number has been used on the shipping papers since March 2010. OAC Rule 3745-27-33(B)(2) states that the shipping papers "be legible and ***complete***." As the generator of the infectious waste, the owner/operator is responsible for ensuring that all information on the shipping papers is accurate and complete before signing. **The owner/operator of Williams Co. Family Medical Center is in violation of OAC Rule 3745-27-33(B)(2) for failing to ensure the shipping papers are accurate and complete.** Since your infectious waste transporter provides pre-printed shipping papers, it is your responsibility to ensure the pre-printed information is correct before signing them.

In addition, "white" copies of the October 19, 2010, January 11, 2011, and January 25, 2011, shipping papers were missing. Please ensure "white" copies are returned to the satellite facility from the Bryan office or contact the infectious waste transporter for a copy of the "white" shipping papers.

Edon Medical Center – 110 East Indiana Avenue - Edon

Ms. Sinh Xayyachack represented the facility for the inspection conducted on May 26, 2011. All infectious waste is segregated at the point of generation. Proper sharps containers with labels are being utilized. The storage room was labeled with the international biohazard symbol.

The spill containment and clean-up procedures did list the location of the spill kits in accordance with OAC Rule 3745-27-30(B)(10). The spill kits were inspected and contained all the required components in accordance with OAC Rule 3745-27-30(B)(11).

The treatment shipping papers were inspected and found to be complete, but using the incorrect registration number. OAC Rule 3745-27-33(B)(2) states that the shipping papers "be legible and ***complete***." As the generator of the infectious waste, the owner/operator is responsible for ensuring that all information on the shipping papers is accurate and complete before signing. **The owner/operator of the Edon Medical Center is in violation of OAC Rule 3745-27-33(B)(2) for failing to ensure the shipping papers are accurate and complete.** Since your infectious waste transporter provides pre-printed shipping papers, it is your responsibility to ensure the pre-printed information is correct before signing them.

Summary of Compliance

- Please ensure the correct generator registration number is used on the shipping papers at all the facilities.
- Please ensure "white" copies of all shipping papers are maintained at each respective facility.

This correspondence addresses specific observations only for the areas of the Midwest Community Health Associates and its satellites 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 inspections.

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 and its satellites from their obligation to comply with other applicable state and federal laws and regulations.

Please notify me once the correct registration number is being used on the shipping papers. You may e-mail me at jeremy.scoles@epa.state.oh.us with a scanned copy of a correct and complete shipping paper or fax it to me at 419-352-8468. I request just one copy from any of the above locations.

If there are any questions regarding this correspondence, please contact me at (419) 373-3079.

Sincerely,

Jeremy Scoles, RS
Environmental Specialist II
Division of Material and Waste Management

/lr

pc: File: DMWM-SW, Williams County, Infectious Waste
Pam Taylor, Edgerton Medical Center
Jackie Rufenacnt, Williams County Family Medical Center
Sinh Xayyachack, Edon Medical Center

ec: Mike Reiser