



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

March 30, 2007

**RE: MONROE COUNTY  
IW - GEN**

John E. Cain, D.D.S.  
Monroe County Clinic  
37984 Airport Road  
Woodsfield, Ohio 43793

**Subject: Small Generator of Infectious Waste**

Dear Dr. Cain:

On March 29, 2007, I conducted an infectious waste inspection at the Monroe Family Health Center. During this inspection, I observed the outside storage area where the shipping boxes of infectious waste are stored prior to being picked up by Stericycle. One box of infectious waste from the Monroe County Clinic was observed being stored in the storage area container.

I spoke with you regarding this situation. You stated that you had contacted Stericycle to set up an account to transport and treat your infectious waste. Please contact this office once a resolution has been reached between your office and Stericycle.

Please find enclosed a copy of the Ohio rules and requirements for small generators of infectious waste.

If you have any questions, please feel free to contact me at (740) 380-5443.

Sincerely,

Trevor L. Irwin, RS  
Environmental Specialist II  
Division of Solid and Infectious Waste Management

TLI/jg

Enclosure

**3745-27-30 Standards for generators of infectious wastes.**

- (A) Each generator of less than fifty pounds of infectious waste in any one month (small generator) shall:
- (1) Identify and separate infectious from non-infectious waste at the point of generation for the purposes of determining whether the generator must comply with paragraph (B) of this rule;
  - (2) Place all of the following in a "sharps" container, as defined in paragraph (B) of rule 3745-27-34 of the administrative Code:
    - (a) Sharp infectious wastes as defined in rule 3745-27-01 of the Administrative Code and paragraph (C) (1) of this rule; and
    - (b) All unused discarded hypodermic needles, syringes, and scalpel blades; and
    - (c) All discarded hypodermic needles, syringes, and scalpel blades used by the generator that are not infectious wastes as defined in rule 3745-27-01 of the Administrative Code.
  - (3)
    - (a) Either treat all specimen cultures and cultures of viable infectious agents on the premises where they are generated to render them noninfectious by any of the methods, techniques, or practices prescribed by paragraph (B) of rule 3745-27-32 of the Administrative Code before they are transported off that premises for disposal; or
    - (b) Ensure that such wastes are treated to render them noninfectious at a treatment facility off that premises that is owned or operated by the generator, a treatment facility that holds a license issued under division (B) of section 3734.05 of the Revised Code, a treatment facility that is authorized by rule 3745-27-32 of the Administrative Code, prior to disposal of the wastes, or a facility in another state operating in compliance with state and federal regulations.
  - (4) Not be considered A treatment facility as "treatment" and "facility" are defined in section 3734.01 of the Revised Code when the generator treats specimen cultures and cultures of viable infectious agents on the premises where they are generated. Such treated cultures may be transported and disposed of in the same manner as solid wastes and need not comply with the shipping paper system as described in paragraph (C) of rule 3745-27-33 of the Administrative Code;
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- (5) Quantify the waste generation rate and keep records recorded in pounds. This generation rate and record shall pertain to the aggregate quantity of waste generated on the premise owned or operated by the generator on a calendar month basis. Upon request of the board of health or its

authorized representative, or the director or his authorized representative, the generator shall provide information regarding the infectious waste generation rate, the generator shall quantify and record the monthly generation rate utilizing one of the following:

- (a) A monthly generation rate log which shall display the month and the weight of all the infectious waste generated on the premises during that calendar month; or
  - (b) Treatment shipping papers that have the weight of all the infectious waste that is generated and sent for treatment documented in pounds for a calendar month; or
  - (c) A combination of a monthly generation rate log and treatment shipping papers to document the monthly generation rate if the generator does not send all infectious wastes generated on the premises for treatment. A generator shall indicate on the monthly generation rate log when this combination is being used. The treatment shipping papers shall be affixed to the corresponding generation rate log page for the indicated month. The mathematical calculation from the log page and the treatment shipping papers shall be clearly indicated on the log page.
- (6) Determine by monthly records, required by paragraph (A) (5) of this rule, if fifty pounds or more of infectious waste is generated. If fifty pounds or more of infectious waste is generated in any one month the generator shall register with the director as a generator of infectious waste on the forms prescribed by the director and as outlined in paragraph (A) of rule 3745-27-36 of the Administrative Code. Generator registration certificates shall apply to premises and shall not include emergency vehicles or public safety vehicles; and
- (7) Comply with paragraph (c) of this rule.

A generator who complies with paragraph (A) (2) of this rule and who generates less than fifty pounds of infectious wastes each month and does not hold a certificate of registration as a generator of infectious wastes may transport and dispose of infectious wastes in the same manner as solid wastes.