



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

February 17, 2010

**RE: SCIOTO COUNTY  
IW GEN**

Concord Health and Rehabilitation Center  
Attention: Jennifer Chaffin, Administrator  
1242 Crescent Drive  
Wheelersburg, Ohio 45662

Dear Mrs. Chaffin:

On February 9, 2010, I conducted an inspection of Concord Health and Rehabilitation Center to determine the compliance status of your infectious waste program in accordance with the Ohio Administrative Code (OAC) Rules, 3745-27-30, 3745-27-33(B), 3745-27-34, 3745-27-35, and 3745-27-36.

During this comprehensive inspection, I met with you and your staff to observe your infectious waste program. Concord Health and Rehabilitation is currently using Stericycle as the registered transporter of infectious waste. You indicated that you have approximately 37 residents and are planning to grow in resident numbers. We discussed that as a generator of infectious waste you must determine if Concord Health and Rehabilitation Center is a large or small generator of infectious waste. This procedure is verified by weighing the infectious waste and logging the information. Currently, this is not being completed by Concord Health and Rehabilitation Center.

This is a violation of Ohio Administrative Code (OAC) 3745-27-30(A)(5)(6).

You stated that you would begin the process of registering the facility as a large generator of infectious waste.

**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:

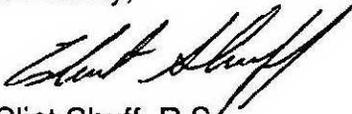
- (5) Quantify the waste generation rate and keep records recorded in pounds. This generation rate and record shall pertain to the aggregate quantity of waste generated on the premise owned or operated by the generator on a calendar month basis. Upon request of the board of health or its authorized representative, 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.

To register as a large generator of infectious waste you should contact Maera Flynn at the Central Office of Ohio EPA at 614-728-5336.

Should you have questions, please contact me at (740) 380-5246.

Sincerely,



Clint Shuff, R.S.  
Environmental Specialist  
Division of Solid and Infectious Waste Management

CAS/jg

cc: Mike Trapp, Scioto County Health Department