



State of Ohio Environmental Protection Agency

265446

Southwest District

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

November 17, 2008

Ms. Michele Hacker
Coram Alternate Site Services
4305 Mulhauser Drive
Fairfield, Ohio 45014

**Re: Coram Alternate Site Services, Infectious Waste Notice of Violation (NOV),
Butler County, Reg # 19-G-00971.**

Dear Ms. Hacker:

On November 12, 2008, I met with you at Coram Alternate Site Services to conduct a "Large Generator of Infectious Waste" inspection. The purpose of the inspection was to determine compliance with applicable State of Ohio Infectious Waste regulations, Ohio Administrative Code (OAC) Rules 3745-27-30, 33, 34, 35, 36.

During my visit, I conducted a full facility inspection, which included but was not limited to; review of the shipping papers, infectious waste segregation, sharps containers, packaging of infectious waste, and infectious waste storage areas.

The following violations were documented as a result of the inspection. All violations are prefaced by the appropriate Ohio Administrative Code (OAC) citation.

1) Spill Containment / Cleanup procedures. OAC 3745-27-30 (A)(11)(e).

- This regulation states in part:

"Ensure that clean-up materials / kits are available in those areas designated in the spill containment and clean-up procedures. Materials utilized in the clean-up of a spill of infectious waste shall include but are not limited to:

(a) Materials designed to absorb spilled materials;

- (b) A U.S. EPA registered hospital disinfectant that is also a tuberculocidal, for a contact time as specified by the manufacture, an unexpired dated stabilized bleach product that is a U. S. EPA registered hospital disinfectant that is also a tuberculocidal, for a contact time as specified by the manufacturer, or materials necessary to prepare a minimum 10 per cent sodium hypochlorite solution prepared immediately prior to use with a minimum of thirty minutes of contact time with the waste;
 - (c) Red or biohazard labeled bag(s) as specified in paragraph (a) of rule 3745-27-34 of the Administrative Code;
 - (d) Latex gloves, or equivalent type of glove, and any other personal protective equipment necessary to implement the spill containment and clean-up procedure; and
 - (e) A first aid kit, unless emergency medical care is available on the premises, boundary tape, and other appropriate safety equipment."
- During my inspection, it was determine that Coram Alternate Site Services did not have a spill kit located on site.

2) Spill Containment / Cleanup Procedures. OAC 3745-27-30 (A)(10).

- This regulation states in part:
- "Develop a spill containment and clean-up procedure. A copy of the procedure shall be posted or readily available on the premises to persons likely to handle infectious waste, including janitorial services. The name, address, and telephone number of the infection control manager or the infectious waste control manager and their backup, along with the location of all spill containment and clean-up materials / kits at the facility, shall be listed at the top of the spill containment and clean-up procedure."
- During my visit, it was determined that Coram Alternate Site Services did not have established cleanup procedures that were readily available to persons likely to handle infectious waste.

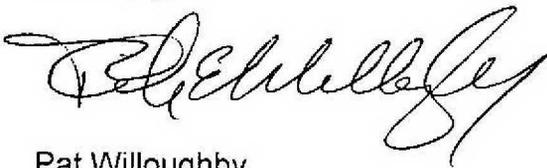
Ms. Michele Hacker
November 17, 2008
Page 3

Please correct these violations and areas of concern immediately and submit documented proof of the corrections within thirty (30) days of the date of this letter.

Failure to list specific deficiencies in this correspondence does not relieve you from complying with all applicable Solid and Infectious waste rules and regulations.

Should you require any technical or regulatory assistance, please feel free to contact me at (937) 285-6648.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pat Willoughby', written in a cursive style.

Pat Willoughby
DSIWM/SWDO

cc: DSIWM/SWDO file.

PW/bp