



State of Ohio Environmental Protection Agency

**Southwest District Office**

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

February 12, 2007

Mr. Brian Cheadle  
Harborside Health Care  
512 Crescent Drive  
Troy, Ohio 45373

134523 NOV

Dear Mr. Cheadle:

On February 6, 2007, I conducted a large generator infectious waste inspection at the above mentioned facility. This inspection was conducted in order to determine compliance with Ohio Administrative Code (OAC) 3745-27, specifically rules governing large generators of infectious waste. The following violations and comments were noted:

1. The shipping papers for the infectious waste transportation and treatment were found complete.
2. The spill cleanup procedure did not state the location of the spill kit or contact information. This is a violation of OAC 3745-27-30(B)(10), which states:

*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 infectious waste control manager and their back-up, along with the location of all spill containment and clean-up materials/kits at this facility, shall be listed at the top of the spill containment and clean-up procedure.*

*Copies of the procedure shall be provided at the request of the board of health with jurisdiction or the director of the Ohio EPA or their authorized representative.*

Please provide a complete procedure and the procedure should be posted or readily available on the premises to persons likely to handle infectious waste, including janitorial services.

3. The biohazard spill kit was not found complete. This is violation of OAC Rule 3745-27-30(B)(11), which states:

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*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 wastes shall include, but are not limited to:*

*(a) Materials designed to absorb spilled liquids;*

*(b) An U.S. EPA registered hospital disinfectant that is also tuberculocidal, for a contact time as specified by the manufacturer, a unexpired dated stablized bleach product that is an U.S. EPA registered hospital disinfectant that is also tuberculocidal, for a contact time as specified by the manufacturer, or materials necessary to prepare a minimum ten 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*

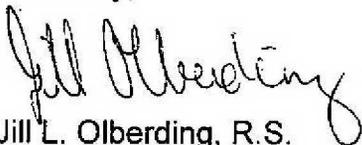
*(e) A first aid kit, unless emergency medical care is available on the premises, boundary tape, and other appropriate safety equipment.*

Please provide a complete biohazard spill kit and ensure the kit is stored where the spill procedure states it is located.

Please respond in writing, within fourteen days of receiving this correspondence. A re-inspection will be conducted.

Thank you for taking the time to complete the inspection. If in the future you have any questions, please contact me at (937)285-6094.

Sincerely,



Jill L. Olberding, R.S.  
Division of Solid and Infectious Waste Management

JLO/br