

3. The Facility was missing the spill containment and clean-up procedures. Failure to develop and maintain the spill containment and clean-up procedures is a violation of OAC Rule 3745-27-30(10) which 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 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;**

**[Comment: These procedures can be the same procedures that were developed in response to OSHA’s blood borne pathogen regulations.]”**

As discussed with Ms. Mann during the inspection, please develop a spill containment and clean-up procedure and place it with your spill kit.

4. The Facility was missing boundary tape from the infectious waste spill kit during our inspection. This is a violation of OAC Rule 3745-27-30 (B)(11) which states in part: **“which outlines the materials to be maintained and used to clean-up spills of infectious waste”**.

Please ensure that the boundary tape and spill procedures are available with the spill kit along with all other required materials.

5. During this inspection the storage area was not locked or visibly labeled with the international biohazard symbol at all points of access (as seen in the photo below). The facility’s failure to designate the infectious waste storage area is a **violation of OAC Rule 3745-27-35**. Generators, as defined under chapter 3734. of the Revised Code, shall adhere to the following handling requirements for all in-use and stored containers of infectious waste:

- (1) Handle infectious waste containers in a manner and location that maintains the integrity of the packaging;
- (2) Lock outside storage areas containing infectious wastes containers to prevent unauthorized access;



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(3) Designate infectious waste storage areas. Those storage areas that are not locked, shall be visibly labeled with a sign stating "warning: infectious waste" and/or displaying the international biohazard symbol at all points of access;

(4) Contain and clean up any spill of infectious wastes from a container within a storage area utilizing either an U.S. EPA registered hospital disinfectant that is also tuberculocidal.

Please place an international biohazard symbol the storage door prior to the follow-up inspection.



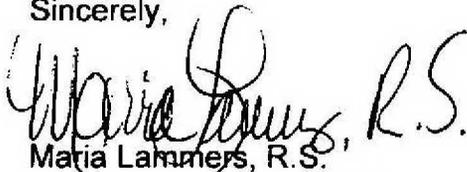
Compliance with the requirements outlined in this letter shall not relieve you of your obligation to comply with other legal obligations, including, but not limited to, Chapters 3704, 3714, 3734, or 6111 of the Ohio Revised Code or under the Federal Clean Water Act, Clean Air Act, Comprehensive Environmental Response, Compensation, and Liability Act, or Resource Conservation and Recovery Act remedying conditions resulting from any release of contaminants to the environment.



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As such, corrections of the violations cited herein are expected to begin immediately. Please respond in writing within fourteen days of receipt of this correspondence regarding your remedy and implementation schedule in regards to the aforementioned violations. **A re-inspection will then be scheduled to verify and document your return to compliance with Ohio law.** I would like to thank your staff for cooperating in this inspection. If you have any questions, please contact me at (937) 285-6046.

Sincerely,



Maria Lammers, R.S.

Environmental Specialist

Division of Solid and Infectious Waste Management

Cc: Butler County Health Department -Chief of Environmental Services  
File

ML/mab

