282974 NOV 5940 Longmeadow Dr
Franklin OH 45005
Warren Co

Ohio | Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

December 13, 2011

Mr. Ken Forrer
Hospice of Dayton
324 Wilmington Avenue
Dayton, OH 45420

Re: Hospice of Butler & Warren Counties, Infectious Waste Notice of Violation (NOV), Warren County, Reg # 57-G-00344

Dear Mr. Forrer,

On December 13, 2011, I visited the Hospice of Butler & Warren Counties 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 and 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 violation was documented as a result of the inspection. The violation is 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 the 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 manufacturer, 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 percent 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;

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(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 determined that Hospice of Butler & Warren Counties Mason did not have roll of boundary tape in the spill kit.*

**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 Hospice of Butler & Warren Counties did have established cleanup procedures, however, it was also determined that the cleanup procedures needed to include a list of personnel to be contacted in the event of a blood spill..*

Please correct the violation immediately and submit documented proof of the correction 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,

Pat Willoughby
Division of Materials and Waste Management
Southwest District Office

PW/tf

cc: DMWM/SWDO file