



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.state.oh.us

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

Re: Otterbein North Shore  
Infectious Waste Inspection  
Notice of Violation  
Generator Registration #83-G-00620

September 19, 2008

Ms. Lisa Hart  
Otterbein Retirement Living Communities  
9400 North Shore Blvd.  
Lakeside-Marblehead, OH 43440

Dear Ms. Hart:

On September 15, 2008, the Ohio Environmental Protection Agency (Ohio EPA) conducted an inspection at Otterbein North Shore (Facility). The Facility is a registered large quantity generator of infectious waste and must meet the standards set forth in Chapter 3745-27 of the Ohio Administrative Code (OAC). You represented the Facility and I represented Ohio EPA during the inspection.

The infectious waste storage area was inspected. The door was locked. The storage bins were lined with the appropriate bag and properly labeled. The sharp container was properly managed in compliance with OAC Rule 3745-27-34(B)(1).

A review of the treatment shipping manifest system was completed. The treatment shipping manifests were missing the registration identification number. The owner/operator is in violation of OAC Rule 3745-27-33(B)(5)(a) which states all treatment shipment manifests include, "The name, registration identification number, and dated signature of the generator, and the address and telephone number of the premises where the wastes were generated...". Please ensure all shipping manifests have the generator registration number listed.

The spill kit containment and clean up procedure were reviewed. The clean up procedures were found to be missing the emergency contact information. OAC Rule 3745-27-30(B)(10) 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.

Ms. Lisa Hart  
September 19, 2008  
Page Two

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 ensure the infectious waste control manager and their back-up are added to the procedures.

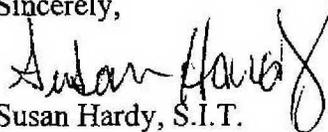
OAC Rule 3745-27-30(B)(11) states, in pertinent part, "Ensure that clean-up materials / kits are available in those areas designated in the spill containment and clean-up procedures. Materials utilized in the clean-up of a spill of infectious wastes shall include, but are not limited to:... (e) A first aid kit, unless emergency medical care is available on the premises, boundary tape, and other appropriate safety equipment..." Please ensure boundary tape is included with the spill kits located in the nurses' station. Attached is the complete list of required contents for a spill kit.

This correspondence addresses specific observations only for the areas of Otterbein North Shore that were inspected. Nothing present in, nor absent from this correspondence is intended to mean that no violations existed at the facility at the time of the inspection.

Compliance with the requirements outlined in this letter, or the solid and infectious waste provisions contained in the Ohio Revised Code Chapter 3734 and the rules promulgated thereunder, does not relieve the owner/operator of Facility from their obligation to comply with other applicable state and federal laws and regulations.

Please call me at 419-373-3043 if you have any questions regarding this letter.

Sincerely,



Susan Hardy, S.I.T.  
Environmental Specialist  
Division of Solid and Infectious Waste Management

/lb

Enclosure

Pc: Kimberly Burnham, DSIWM, NWDO

~~File: Ottawa Co. Infectious Waste~~

Ec: Mike Reiser, DSIWM, NWDO