

**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

Re: Hardin General Surgical Associates  
Infectious Waste Inspection  
Hardin County

December 16, 2010

Ms. Diane Shepherd  
Hardin General Surgical Associates  
75 Washington Boulevard; Suite 102  
Kenton, Ohio 43326

Dear Ms. Shepherd:

On December 10, 2010, the Ohio Environmental Protection Agency (Ohio EPA) conducted an inspection at Hardin General Surgical Associates (Facility). This Facility is a large quantity generator of infectious waste, registered under Hardin Memorial Hospital, number 33-G-00050, and must meet the standards set forth in Chapter 3745-27 of the Ohio Administrative Code (OAC). I represented Ohio EPA during the inspection and you represented the facility. Following are the results of the inspection.

The initial phase of the inspection consisted of a review of the treatment shipping paper system. The treatment shipping papers were inspected and found to be complete and in order.

The spill kit was inspected. All the required components were present within the spill kit in accordance with OAC Rule 3745-27-30(B)(11). However, the CaviCide disinfectant had an expiration date of May 2010. Please replace the expired disinfectant with a new bottle.

The spill containment and clean-up procedure for the Facility was reviewed during the inspection. In accordance with OAC Rule 3745-27-30(B)(10), the location of the spill kit and the infection control manager and back-up were included in the procedure.

Multiple rooms where infectious waste would be handled were inspected. Sharps containers were available in each area, were properly labeled, and were not overfilled. However, some waste cans identified for infectious waste were lined with regular trash bags. Furthermore, in the waste storage room, there were two bags of infectious waste placed inside a cardboard infectious waste shipping box; in which the box was not properly lined with a red bag nor assembled. The two bags of infectious waste were in contact with the floor. OAC Rule 3745-27-30(B)(2) states, in part, that the generator shall "place infectious wastes other than 'sharps' in red or conspicuously labeled plastic bags labeled with the international biohazard symbol . . ." In addition, OAC Rule 3745-27-34(A)(1) states, in part, that packaging of infectious waste shall be in bags "red in color or conspicuously labeled with the international biohazard symbol." **The owner/operator of Hardin General Surgical Associates is in violation of OAC Rule 3745-27-30(B)(2) and OAC Rule 3745-27-34(A)(1) for failing to place infectious waste in red bags or other appropriately labeled bag.** Please ensure all waste containers identified for infectious waste are lined with red, biohazard bags and the shipping boxes are properly lined and assembled before placing waste into the boxes. The storage room was appropriately labeled

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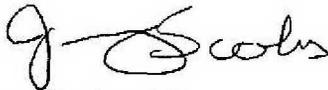
with the international biohazard symbol. Please respond, in writing, to Ohio EPA within 14 days of the date of this letter documenting that the violation has been corrected. You may fax the documentation to my attention at (419) 352-8468 or mail the documentation to 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

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

Compliance with the requirements 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 Hardin General Surgical Associates from their obligations to comply with other applicable state and federal laws and regulations.

If you have any questions, please contact me at the Northwest District Office at (419) 373-3079.

Sincerely,



Jeremy Scoles, RS  
Environmental Specialist II  
Division of Solid and Infectious Waste Management

/cs

pc: ~~DSIWM~~ ~~NWDO~~ ~~File~~ ~~Hardin County~~ ~~Infectious Waste~~  
Ms. Cindy Althouse, Hardin Memorial Hospital

ec: Mike Reiser