



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

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www.epa.ohio.gov

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

Re: Hardin Memorial Hospital Lab
Annex
Infectious Waste Inspection
Hardin County

October 30, 2009

Mr. Craig Duff
Hardin Memorial Hospital
Laboratory Manager
921 East Franklin Street
Kenton, Ohio 43326

Dear Mr. Duff:

On October 7, 2009, the Ohio Environmental Protection Agency (Ohio EPA) conducted an inspection at Hardin Memorial Hospital Lab Annex (Facility) located at 75 Washington Avenue, Kenton, Ohio. This Facility is a registered large quantity generator of infectious waste, 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 Ms. Persie Nelson 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 Facility had no shipping papers because the infectious waste is managed by the hospital. However, a waste tracking log has been created to track the number of sharps containers that are managed by the hospital.

The spill kit for the Facility was inspected. All the required components were present within the spill kits in accordance with OAC Rule 3745-27-30(B)(11).

The spill containment and clean-up procedure for the Facility was present during the inspection. The procedure is kept within the spill kit. In accordance with OAC Rule 3745-27-30(B)(10), the location of the spill kit and the name and telephone number of the infection control manager must be included in the procedure. The procedure states the location of the spill kit as being in housekeeping at the hospital. Furthermore, there are no names designated within the procedure. **The Facility is in violation of OAC Rule 3745-27-30(B)(10) for failing to have a complete and accurate spill procedure.** Please update the procedure to reflect the spill kit location at this Facility and the name of the infection control manager. Ohio EPA provided Ms. Nelson with a procedure template to utilize at this Facility.

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The area where infectious waste is handled was inspected. The sharps container was available in this area, was properly labeled, and was not overfilled. The sharps containers are filled to a reasonable level, sealed, and taken to the hospital's storage room.

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 Memorial Hospital Lab Annex 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

/lb

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

ec: Mike Reiser