



**Environmental
Protection Agency**

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

September 2, 2011

**RE: BELMONT COUNTY
BELLAIRE COMMUNITY HOSPITAL
IW - GEN**

Mr. Mike Blair
Director of Facility
4697 Harrison Street
Bellaire, OH 43906

Dear Mr. Blair:

The Southeast District Office of the Ohio Environmental Protection Agency (EPA) conducted an investigation and inspection of Bellaire Community Hospital (Facility). On July 19, 2011, Ohio EPA received a complaint along with pictures of laboratory test tubes received by Apex Transfer Station from a load of garbage that was brought to the transfer station from the Facility. During the course of the inspection, it appeared that all sharps and infectious waste were properly stored in containers and labeled. After discussing the concern of improper disposal of test tubes, it was determined that the test tubes that were disposed of were plastic and the preservative had expired; therefore, they were disposed of in the trash. The Facility will be handling expired test tubes as infectious waste to prevent further concern at the transfer station.

August 24, 2011, I conducted an infectious waste inspection of the Facility. During my inspection, we reviewed the shipping logs; I looked at patient treatment rooms and the storage area for infectious waste. The Facility is in violation of the following rules:

OAC Rule 3745-27-33(B)(1)(b):

The treatment shipping paper shall accompany the shipment of untreated infectious wastes that are described on the shipping paper. The treatment shipping paper shall be used when a shipment of infectious waste is transported to an infectious waste treatment facility that is not owned or operated by the generator of the infectious waste. The treatment shipping paper shall:

- (1) *Be produced from a form prescribed by or approved by the Ohio EPA and consist of the following:*
 - (b) *A multipart, carbonless form, as prescribed in paragraph (B)(1)(a) of this rule, with additional attachments for multiple transporters and/or treatment facilities. The information for the additional attachments shall be copied from the original white top copy on to a second multipart, carbonless form with the generator signature line left blank, if not completed by the generator of the infectious wastes. The second multipart form shall consist of sufficient pink pages to ensure that each transporter has a pink copy to retain in their files, as well as enough yellow pages to ensure that each treatment facility has a yellow copy to retain in their files. **The additional attachments shall be: physically attached to the original white top copy, contain***

sufficient information to ensure an easy connection back to the original white top copy, accompany the infectious waste until actual treatment occurs, and will be returned to the generator along with the original white top copy. The discrepancy section shall be completed to describe the need for the additional attachments and shall document the number of attachments.

The Facility is required to physically attach additional copies to the original white copy. The Facility currently stores all shipping logs in a folder and in no particular order. The following white copies were missing from the shipping logs:

- 7/19/11
- 7/26/11
- 8/2/11
- 8/9/11
- 8/16/11

Please provide copies of the above-mentioned shipping logs along with a copy of your contingency plan as prescribed in Ohio Administrative Code rule 3745-27-35(C)(3).

Please contact me at (740) 380-5228 if you have any questions or I can be of any assistance.

Sincerely,



Erika Jackson
Division of Materials and Waste Management

EJ/cb