



**Environmental
Protection Agency**

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

February 15, 2012

Don Roush
UVMC
3130 N. Dixie Highway
Troy, Ohio 45373

**RE: UVMC HOSPITAL
LG IW Generator Inspection, Notice of Violation**

Dear Mr. Roush:

On February 8, 2012, Michelle Ackenhausen and I conducted a large generator of infectious waste inspection at the above-mentioned facility in the presence of Deanna Rhoades. This inspection was conducted in order to determine compliance with Ohio Administrative Code (OAC) 3745-27, specifically rules governing large generators of infectious waste (IW). The following violations and comments are a result of the inspection:

1. During the inspection the following areas were inspected: Emergency Department, G-Pod, H-Pod, J-Pod, A-Pod, ICU, OB, PCU and the Outside IW Storage Room.
2. The shipping papers for the infectious waste were complete and well organized.
3. The hospital stores IW for Stericycle to pick-up in an outside storage area. The area was locked.
4. IW containers in the J-Pod soiled utility room and the OB's mother and baby soiled room were found overfilled, losing the ability to be properly packaged. In addition, during the inspection in the J-Pod soiled utility room, a UVMC employee was observed physically compacting the waste in order to close the box.



Overfilled container of IW found in J-Pod soiled utility room. During the inspection UVMC employee was observed compacting the IW to close the box.



Overfilled container of IW found in Mother and Baby soiled utility room.

The Facility's failure to properly manage and maintain the integrity of packaging for in-use containers is a violation of OAC Rule 3745-257-35(A)(1) which states in part;

Generators shall handle infectious waste containers in a manner and location that maintains the integrity of the packaging.

and a violation of OAC Rule 3745-27-30(B)(3), which states in part;

Containers holding infectious wastes shall not be dropped, managed, or transferred in such a manner as to cause damage to the bag or container.

Compaction of the IW is a violation of OAC Rule 3745-27-30(B)(4) which states in part;

... not compact or grind any other type of infectious waste until after the wastes have been treated in accordance with rule 3745-27-32 of the Administrative Code.

Compliance with the requirements outlined in this letter shall not relieve you of your obligation to comply with other legal obligations, including, but not limited to, Chapters 3704, 3714, 3734, or 6111 of the Ohio Revised Code or under the Federal Clean Water Act, Clean Air Act, Comprehensive Environmental Response, Compensation, and Liability Act, or Resource Conservation and Recovery Act remedying conditions resulting from any release of contaminants to the environment.

Corrections of the violations cited herein are expected to begin immediately. Please respond in writing within fourteen days of receipt of this correspondence regarding your remedy and implementation schedule in regard to the aforementioned violations. **A re-inspection will then be scheduled to verify and document your return to compliance with Ohio law.** I would like to thank your staff for cooperating in this inspection. If you have any questions, please contact me at (937) 285-6094.

Sincerely,



Jill Olberding, R.S.
Division of Materials and Waste Management

JO/tf

ec: Kathy Jackson