



Environmental
Protection Agency

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

February 27, 2012

Ms. Kelli Oney
Doctors Urgent Care
3920 Village Drive
Franklin, OH 45005

Dear Ms. Oney:

On February 22, 2012, I met with you and conducted a site visit at the Doctors Urgent Care facility, located at 3920 Village Drive, Franklin, Ohio 45005. This inspection was conducted in order to determine compliance with Ohio Administrative Code (OAC) Rule 3745-27-30, 33, 34, 35 and 36.

The following violations were noted during the inspection:

1. The infectious waste spill containment and clean-up procedure did not clarify the primary infectious waste control manager and their back-up information on the spill containment and clean-up procedure. These items should be listed at the top of the procedure in order to comply with OAC Rule 3745-27-30 (B) (10), which states in part:

Develop a spill containment and clean-up procedure...The name, address, and telephone number of the infection control manager or infectious waste control manager and their back-up,...at this facility, shall be listed at the top of the spill containment and clean-up procedure...

This violation was corrected by placing this information on the spill containment and clean-up procedure. The corrected document was e-mailed to my office on the same day of the inspection.

2. The infectious waste spill kit did not contain all of the materials necessary to comply with Rule OAC Rule 3745-27-30 (B) (11), which states in 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: (a) **Materials designed to absorb spilled liquids**; (b) **A U.S. EPA registered hospital disinfectant that is also tuberculocidal...***

This violation was corrected during the inspection by placing materials designed to absorb spilled liquids and a U.S. EPA registered hospital disinfectant that is also tuberculocidal, in the infectious waste spill kit.

3. Two original/generator white treatment shipping papers were missing in the treatment shipping paper file. One from the infectious waste transported from the facility on October 11, 2011 and one from the infectious waste transported from the facility on November 8, 2011. The original/generator white treatment shipping paper must be signed by the treatment facility operator, and returned within forty-five days of treatment of treatment in order to comply with Rule OAC Rule 3745-27-33 (B)(6) which states in part:

*Be returned to the generator within **forty-five days of treatment** of the waste at a treatment facility...*

This violation was corrected by obtaining a copy of the missing white treatment shipping paper, signed by treatment facility operator, from Waste Management. Copies of these documents were e-mailed to my office on the same day of the inspection.

4. The generator registration identification number was not listed on the original/generator white treatment shipping papers. The generator registration identification number must be added in order to comply with OAC Rule 3745-27-33 (B) (5), which states in part:

*The name, **registration identification number**, and dated signature of the generator...*

This violation was corrected by the operator filling in the generator registration identification number on the original/generator white treatment shipping papers. A representative sample of copies of these documents was e-mailed to my office on February 24, 2012.

Thank you for your time and consideration during the inspection and for correcting the violations in a timely manner.

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.

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Ohio EPA is available to provide any training requests that you and your staff may need regarding Ohio EPA's Infectious Waste Rules and Regulations.

If you have any questions or need additional information, please contact me at (937) 285-6647.

Sincerely,

A handwritten signature in cursive script that reads "Monte Bluebaum R.S.".

Monte Bluebaum, R.S.
Environmental Specialist II
Division of Solid and Infectious Waste Management

MB/ca

cc: Butler County Health Department - Chief