



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

Re: Marshfield Food Safety
Infectious Waste Inspection
Putnam County

July 19, 2013

Ms. Dawn Rodabaugh
Marshfield Food Safety
3700 State Route 65
Leipsic, Ohio 45856

Dear Ms. Rodabaugh:

On June 28, 2013, I, representing the Ohio Environmental Protection Agency (Ohio EPA) conducted an inspection at Marshfield Food Safety (Facility). The Facility is a registered large quantity generator of infectious waste and treatment facility. The purpose of this inspection was to verify compliance with the Ohio Administrative Code (OAC) Chapter 3745-27. You represented the Facility during the inspection.

This letter is intended to:

- Describe my observations of the Facility, and
- Notify the owner/operator of any violations of the rules identified.

Description of Ohio EPA's observations of the Facility:

The daily log, strip charts, and quality assurance testing for autoclave number E122 were reviewed. The strip charts had the chamber temperature recorded every minute but a few strip charts recorded the temperature every five minutes. You indicated the company's policy was recently changed nationwide to record the chamber temperature every five minutes. After the inspection, you corrected the recorder to print every two minutes which is required by OAC Rule 3745-27-32(D)(2)(a), and promptly e-mailed a copy of the strip chart which documents the change. As discussed during the inspection, if the recording device fails the owner/operator must "*manually record the chamber temperature, at a maximum, once every ten minutes until the exhaust cycle is initiated*" for compliance with OAC Rule 3745-27-32(D)(2)(a)(i).

An independent company calibrated the autoclave on June 19, 2013. Operating procedures were on note cards in the autoclave room. The international biohazard sign is posted on the lab entrance doors and the outside storage area was locked to limit unauthorized access. The registration certificate number 00-G-01692 was available. Disposal papers were not available.

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The facility management plan (FMP) was reviewed. The FMP consisted of several binders, along with different trainings and/or procedures located on the Facility's intranet. Please replace the old infectious waste rules in the FMP with the new rules effective March 1, 2013. A copy of these rules, along with other infectious waste information can be found at the following website:
<http://epa.ohio.gov/dmwm/Home/InfectiousWaste.aspx>.

Notification of violations of Ohio laws and rules:

One violation was observed during the inspection.

For not having a disposal paper accompany the treated infectious waste from the treatment facility to the disposal facility, the owner/operator is in violation of OAC Rule 3745-27-33(A). The disposal paper must be signed, dated, and given to the transporter by the Facility before the wastes are removed from the premise. The disposal paper must contain the following information:

- The name of the owner or operator of the facility where the wastes were treated and the address of the treatment facility;
- A certification by the owner or operator of the treatment facility where the wastes were treated indicating that the wastes have been treated by the methods, techniques, and practices prescribed by paragraph (A) of rule 3745-27-32 of the Administrative Code.

Please ensure the required information is on the disposal papers, and submit the disposal paper for Ohio EPA approval.

The owner/operator of the Facility needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, the owner/operator is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies/forms, and photographs, as appropriate, and may be submitted via the postal service or electronically to kristin.tillison@epa.state.oh.us.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, the owner/operator is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

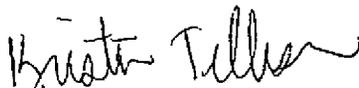
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The correspondence addresses specific observations only for the areas of the Facility that were inspected. Nothing present in, nor absent from this correspondence is intended to mean that no other violations existed at the Facility at the time of inspection.

Compliance with the requirements outlined 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 the Facility from their obligations to comply with other applicable state and federal laws and regulations.

If you have any questions, please contact me at (419) 373-3064.

Sincerely,



Kristin Tillison, R.S.
Environmental Specialist
Division of Materials and Waste Management

/cg

pc: File: DMWM/SW, Putnam County, Infectious Waste

ec: Jeremy Scoles, Ohio EPA, DMWM-NWDO