



**Environmental  
Protection Agency**

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

Butler Co  
Health Dept  
Inf. Waste

135714

February 1, 2011

**RE: Atrium Grand Laboratory and  
Mammography, Butler County  
Notice of Violation – Large Generator  
Inspection Correspondence**

Ms. Nancy Smith  
4216 Grand Ave.  
Middletown, Ohio 45044

Dear Ms. Smith:

On January 19, 2011, I representing the Ohio Environmental Protection Agency (Ohio EPA) Division of Solid and Infectious Waste Management (DSIWM) met with you and Darlene Fletcher to conduct a comprehensive infectious waste large generator inspection of the (Facility) located at 4216 Grand Ave, Middletown, Ohio.

The purpose of this inspection was to determine compliance with Ohio's Infectious Waste Regulations. I inspected the infectious waste handling areas, infectious waste storage areas, spill kit and procedures, conducted a records review including treatment shipping paperwork, and checked for a valid registration certificate.

The following observations were made during our inspection:

1. The treatment shipping papers were on file and Stericycle, Inc (Stericycle), transporter registration number 00-T-00199, was identified as the Facility's Infectious Waste Transporter. Upon review of the shipping papers they were incomplete since they listed an old generator certificate registration number. The Facility's failure to have their current generator number listed is a violation of Ohio Administrative Code (OAC) Rule 3745-27-33(B)(2) which states in part: "the shipping papers need to be complete and legible" and OAC Rule 3745-27-33(B)(5)(a) which states in part: "The name, registration identification number, and dated signature, of the generator, and the address and telephone number of the premises where the wastes were generated" needs to be listed on the top of the shipping papers.

During this inspection it came to Ohio EPA's attention that a change had been made to the registrant's generator registration number during the renewal of the registration in June 2010. The new generator registration number listed as #83-G-00022 should be used on all shipping paperwork going back to June 21, 2010 since the registrant Atrium Medical Center is now located within Warren County.

Ms. Nancy Smith  
February 1, 2011  
Page 2

Ms. Smith abated the violation noted above and sent me a fax at 2:04pm EST on January 19, 2011 to document that she wrote the generator registration number on all copies of her shipping papers for the appropriate time period as identified during our inspection.

2. The infectious waste spill procedures for the Facility may need to be updated to reflect the corporate name change on the policy, please verify and revise as necessary. During the inspection Ms. Fletcher indicated that she would follow-up on this document and make sure if a revision had been made that the updated policy be provided to each Atrium Medical Center facility.

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.

If you have any questions, please contact me at (937) 285-6046.

Sincerely,



Maria Lammers, R.S.  
Environmental Specialist  
Division of Solid and Infectious Waste Management

cc: Darlene Fletcher, Environmental Services Manager, Atrium Medical Center

ML/rb