



# Facts About...

December 21, 2011

## State Registered Service Providers Newsletter

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**TO:** To All State Registered Service Providers

**THROUGH:** Roland G. Fletcher, Manager IV, Radiological Health Program (RHP)

**FROM:** Eva Nair, Chief, Radiation Machines Division (RMD)  
Jerry Adams, Section Head, Radiation Machines Division (RMD)

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### **Introduction**

The Maryland Department of the Environment (MDE), Radiological Health Program wishes to thank you for your active participation and continued support in the forward movement of the Division during this past year. This year has been particularly challenging for the RMD with the loss of three individuals in the Registration and Certification Section. Currently we are in the process of rebuilding that Section and hopefully by the end of the year we will be fully staffed and operational.

### **Radiation Machines Division Announcement**

The Radiation Machines Division (RMD) is proud to announce the filling of three positions:

Talya Langbaum – Health Physicist Trainee in RMD’s Registration and Certification Section.  
Mahala Thomas – Health Physicist Trainee in RMD’s Registration and Certification Section.  
Adedotun Odegbile – Health Physicist Trainee in RMD’s Registration and Certification Section.

To fulfill the need for direct oversight of new staff on a temporary basis, effective October 26, 2011, Ahsan Bhatti is the Acting Section Head for the Registration and Certification Section.

### **Preventive Maintenance Regulation**

Effective January 1, 2012, the RMD will be enforcing COMAR 26.12.01.01F.3 (d) (4) which states that registrants must submit written documentation (a service report), demonstrating that the preventative maintenance has been performed for their radiation machine(s). The documentation must be received by the RMD 30 days after the preventative maintenance has been performed. As a registered service provider, ensure that your clients are made aware of this change in procedure. For registrants failing to comply with these regulations, enforcement action will be taken against the facility. Enclosed is the memo that will be mailed to all stakeholders informing them of the change in procedure.



### **Update of enforcement within the Radiation Machines Division**

The number of enforcement cases has decreased since most of the enforcement actions were taken on dental facilities. Since the Maryland Senate Bill 664 went into effect June 1, 2010, the majority of the dental facilities have been able to correct their cited violations within 20 working days. This allows a dental facility to repair or correct their violations and submit documentation to the RMD by the 20<sup>th</sup> working day. The time starts when the inspector issues an Inspection Summary form (RX2) or Notice of Violation to the facility. If service repair work can not be performed within the mandatory time period, an extension or waiver will not be granted and escalated enforcement will be pursued. **The first day the RX2 is provided to the facility starts the count toward any potential penalty.**

### **Regulations Update**

Supplement 20 which includes radioactive material changes to COMAR 12.12.01.01 was effective on September 19, 2011. The updated information can be found on the MDE's website.

### **Service Provider Requirements for Preventive Maintenance (PM)**

A service provider is required to follow the manufacturer's recommended intervals of inspection and the required evaluations of equipment performance. If the service provider performs extra services, beyond the manufacturer's specifications, that is between the provider and the registrant. The RMD has reviewed the incoming preventive maintenance documentation and it reveals that there are service companies that are not reporting potential violations to the registrants. If the inspector should come upon this situation, the radiation machine should be cited and it should be brought to the attention of the facility representative. The RMD will not accept a piece of paper that states that PM has been performed at a certain facility. The RMD expects a detailed report of the items that were checked.

### **Registered Service Providers**

There have been facilities that are lodging complaints against certain registered service providers that have been slow to respond to inquiries about having their radiation machine undergo service or repair work. As a reminder, the MDE issues you a registration to ensure that you are providing x-ray services which should be your priority. Only Registered Service providers by regulation are allowed to perform x-ray services in the State of Maryland.

### **Accelerator Plan Reviews**

If an oncology facility is replacing their medical accelerator but not undergoing any structural changes, the registrant must submit the following:

1. The location of the machine
2. The design and anticipated power use
3. Workload and occupancy factors
4. Modality change and addressing scatter radiation

The RMD staff will perform an area survey after installation of the radiation machine. If there are questions or you need to schedule an area survey, please contact Mr. Randall Haack.

### **Handheld Dental Radiation Machines**

The handheld dental radiation machines are only approved to be used at the following settings: nursing homes, home health care, special needs patients, hospitals, or sedated patients. The devices **will not** be allowed in dental offices where stabilized/stationary conventional units are utilized **or** in a school environment for screening purposes. The applicants must complete the registration form, conditions form, and operator training records. If you have questions about the registration process, please refer to the MDE website.

### **Manufacturer Performance Criteria**

Each manufacturer provides tolerance limits for kVp and timer accuracy by their respective radiation machine model. The service companies are required to use this information to determine if the radiation machine meets the manufacturer specifications. If a tolerance limit is not specified, the service company may use the plus or minus 10% as the rule of measure.

### **Website Update**

The Maryland Department of the Environment's (MDE) Radiological Health Program website continues to update and to create a user friendly version of the Regulations for the Control of Ionizing Radiation (COMAR 26.12.01.01)

### **Important RHP web pages:**

[http://www.mde.state.md.us/programs/Air/RadiologicalHealth/Pages/Programs/AirPrograms/Radiological\\_Health/index.aspx](http://www.mde.state.md.us/programs/Air/RadiologicalHealth/Pages/Programs/AirPrograms/Radiological_Health/index.aspx)

[http://www.mde.state.md.us/programs/Air/RadiologicalHealth/XRayApplicationFormsandGuidance/Pages/Programs/AirPrograms/radiological\\_health/xray\\_applications/index.aspx](http://www.mde.state.md.us/programs/Air/RadiologicalHealth/XRayApplicationFormsandGuidance/Pages/Programs/AirPrograms/radiological_health/xray_applications/index.aspx)

Enclosure: Preventive Maintenance Memo