

Miller, Diane M. (CDC/NIOSH/EID)

From: Richard Warburton [rwarburton@chemdaq.com]
Sent: Tuesday, June 24, 2008 2:17 PM
To: NIOSH Docket Office (CDC)
Subject: 135 - NIOSH Healthcare Workers Survey
Attachments: Comments on Survey of Healthcare Employee Safety and Health Practices June 2008.doc

Please find comments in attached file.

Thanks

Richard Warburton

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June 24th 2008

NIOSH Mailstop: C-34
Robert A. Taft Lab.
4676 Columbia Parkway
Cincinnati, Ohio 45226

To whom it may concern,

I am writing this letter in response to your solicitation for comments on the Survey of Healthcare Employer Safety and Health Practices, docket # NIOSH-135.

I am the Chief Technology Officer and General Counsel for ChemDAQ Inc. ChemDAQ is a leading manufacturer of gas monitoring equipment, focusing primarily on monitoring sterilant gases in healthcare for occupational safety.

Comments are offered for modules D (chemical Sterilants) and E (High Level Disinfectants) and Module G (Anesthetic Gases – administration). Overall, I fully support NIOSH developing this survey. It will provide very valuable information that is not currently available.

Module D: Chemical Sterilants

- A) New Question after Q. 26, intended to assess frequency of employee exposure to sterilant gases

During the past 7 calendar days have you experienced any symptoms of exposure to ethylene oxide? Check all that apply:

- Headache, nausea
- Smell
- Eyes stinging
- Irritation of respiratory tract
- Skin irritation, burn or blister
- Other; (Please specify): _____

- B) New Question after Q 26, intended to assess level employee protection from sterilant gases.

What methods are employed in the facility to monitor employee exposure to ethylene oxide? Check all that apply:

- Badges occasionally
- Badges continually
- Continuous monitor that displays the EtO concentration in the room air.
- Gross leak detector, provides an alert in the case of a major leak.
- Other (please specify): _____

- C) New Question after 33 (similar to Q. 26, but for hydrogen peroxide gas plasma)

In regards to that same sterilizer, was a visual display of the hydrogen peroxide level (i.e., concentration of hydrogen peroxide in the room) present in the work area?

- Yes
- No
- Don't know

- D) New Question after 33, (Repeat exposure question for hydrogen peroxide)
During the past 7 calendar days have you experienced any symptoms of exposure to hydrogen peroxide? Check all that apply:

- Headache, nausea
- Smell
- Eyes stinging
- Irritation of respiratory tract
- Skin irritation, burn or blisters
- Other; (Please specify): _____

- E) New Question after Q 33, intended to assess level employee protection from sterilant gases.

What methods are employed in the facility to monitor employee exposure to hydrogen peroxide? Check all that apply:

- Badges occasionally
- Badges continually
- Continuous monitor that displays the EtO concentration in the room air.
- Gross leak detector, provides an alert in the case of a major leak.
- Other (please specify): _____

- F) New Question after Q. 26 (analogous to Q. 4, but related to hydrogen peroxide)

Do you know the OSHA permissible exposure limit (PEL) value for hydrogen peroxide and the NIOSH Immediately dangerous to life and health limit (IDLH) value?

- Yes, I know the OSHA PEL for hydrogen peroxide
- No, I don't know the OSHA PEL for hydrogen peroxide
- Yes, I know the NIOSH IDLH for hydrogen peroxide
- No, I don't know the NIOSH IDLH for hydrogen peroxide

- F) The questions are limited to ethylene oxide (EtO) and hydrogen Peroxide gas plasma; however there ozone is another chemical sterilant that was recently approved by the FDA and so should be included in the survey, even though there not many ozone sterilizers in service yet.

Module E: High Level Disinfectants

A) After question 12

In regards to that same disinfectant system, was a visual display of the disinfectant vapor level (i.e., concentration of disinfectant vapors in the room) present in the work area?

- Yes
- No
- Don't know

B) After question 17

During the past 7 calendar days have you experienced any symptoms of exposure to disinfectant solution? Check all that apply:

- Headache, nausea
- Smell
- Eyes stinging
- Irritation of respiratory tract
- Skin irritation, burn or blisters
- Other; (Please specify): _____

Disinfectant causing symptoms of exposure _____



Module G (Anesthetic Gases – administration)

New Question, after Question 19, or 19(b).

In regards to administration of the anesthetic, was a visual display of the anesthetic agent level (i.e., concentration of anesthetic gas in the room) present in the work area (not the concentration being delivered to the patient)?

- Yes
- No
- Don't know

Thank-you for the opportunity to comment on the NIOSH survey. Please let me know if there is any thing I can do to further its success.

Yours sincerely

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CTO & General Counsel