From: Lewis, Merideth

To: DIR RS

Subject: Re: Surgical Plume Meeting 2025

Date: Tuesday, September 30, 2025 9:23:09 PM

Importance: High

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Hi Christine, this is later than EOB, later than expected. I was scrubbed in all day in the OR and then have been writing my dissertation analysis all evening...anyway, I think it is important and correct to edit the title to more accurately reflect the exposure. I suggest this: Occupational and Environmental Exposure to Surgical Smoke and Plume in Procedural Areas in Health Care. Then you have established these as two separate entities and then in (a) Scope and Application, add Surgical Smoke in front of plume, and anywhere else in the document. I think it would be most appropriate and timely, reflecting the state of the science more accurately at a time when academia and the environment are not a priority on most areas of our national agenda. In (b), the Definitions only include ASC? What about hospitals and MD offices who have OR suites? I may be missing something here, but I believe this is at the state level. I would also write in a clause that covers any new technology that generates smoke or plume...oh, I see now, these are in alphabetical order as a key for readers to refer to...I would also add the Hierarchy of Controls to give a visual for this, since PPE is the last line of defense and many think it is the first...as far as (B) under Control Measures, this is a challenge in smaller offices and ASC's so this should be written to ensure that all those little places understand that they are held to this standard. I can tell you from being in other sites for mock site visits that they are not in compliance, even in major metro areas. Lots of opportunity here. As far as (e) training, "the employer shall provide effective training...." The word effective is too open ended and this should be changed to comprehensive or something else. We never know how effective transferring knowledge has been unless there is an exam. This needs to be more clear about who these employees are as everyone from housekeeping to anesthesiologist, with nurses and scrub techs and PA's - plus fellows and residents - all get exposed. Lastly, the record keeping section makes me want to go get my huge text on Occupational and Environmental Health Medicine and Nursing to ensure that it meets the standards...this is late, but I hope there is something here that is helpful! I would love to be involved and continue to support however I can at this time. OH, and the filters are biohazards and need to be disposed of in red bags and housekeeping along with nursing staff need education on this too! Often overlooked. I may not be thinknig at a systems level at this point in the day, it is important to me, this topic, and so hope this is somehow helpful. Please advise. Best, Merideth

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