



NATIONAL UNION OF
HEALTHCARE WORKERS

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To the Division of Occupational Safety and Health,

The National Union of Healthcare Workers (NUHW) appreciates the opportunity to offer comments on the discussion draft for regulations for Occupational Exposure to Plume in Health Care, as required by AB 1007. NUHW represents 19,000 health care workers who work in hospitals, nursing homes, behavioral health, correctional facilities, home health, and hospice. Our members include Operating Room Technicians, Registered Nurses, and other classifications that may be exposed to plume in the course of their work, and we appreciate the Division's work to develop a protective standard.

Written Exposure Control Plan

NUHW supports the Division's additions to (2)(A) which would require exposure plans to include the name and position of the person responsible for implementation and (B) a list of all job classifications that have an occupational exposure to plume. (2)(A) will help employees know who to contact if they have concerns, suggestions, or need additional training. (2)(B) will help the employer identify which classifications need training.

Employees and their authorized representatives can provide valuable perspective on the Exposure Control Plan, and we appreciate the requirement under (2)(F) to involve employees in all elements of the plan. Frontline employees often best understand exposure risks, protective protocols, and are a key resource in communicating and enforcing workplace safety standards.

Control Measures

NUHW would like to suggest the following additions to (1) Engineering Controls. NIOSH's *Control of Smoke from Laser/Electrical Surgical Procedures* recommends disposing of all tubing, filter, and absorb comments from plume evacuation systems at the end of the procedure. This recommendation would ensure components of the plume evacuations system which become contaminated with blood, bacteria, particulate, and hazardous materials, are safely despised of.

NUHW would also like to express support for the addition of items (3) and (4) which require the use of respirators and appropriate eye protection. We appreciate the inclusion of appropriate personal protective equipment.

Thank you for the opportunity to provide comment.

Sincerely,

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