Nearman, Michael

From: Carlos Bueno [CBueno@doheny.org]
Sent: Friday, April 25, 2008 2:05 PM
To: CBSC@dgs.ca.gov.
Subject: Humidifer Comments TS 4-24-08

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
2525 NATOMAS PARK DR., SUITE 130
SACRAMENTO, CA 95833
(916) 263-0916 Phone
(916) 263-0959 Fax
Email: BSC@dgs.ca.gov

Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED MARCH 18, 2008
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: MAY 12, 2008

Date: 4-25-08

From: Carlos Bueno
Name (Print or type)

Doheny Eye Institute
Agency, jurisdiction, chapter, company, association, individual, etc.

1450 San Pablo street Los Angeles California 90033

Street City State Zip

I/We (do) (do not) agree with:

The Agency proposed modifications As Submitted on Section No. 315.1.1 2007 CMC OSHPD 1 & 4

and request that this section or reference provision be recommended:

Approved Disapproved Held for Further Study Approved as Amended

to the proposing state agency.

Suggested Revisions to the Text of the Regulations:

Exception: Calculations substantiating that the humidity will not be outside the range shown in Table 315 more than 5.0% of the time on an annual basis may be submitted to OSHPD as an alternate method of compliance. Humidifiers are not required if OSHPD approves the alternate method of compliance. Calculations shall be performed by a California licensed mechanical engineer and shall be based on the 1982 ASHRAE Climatic Data for Region X or other nationally recognized weather data.

Reason: [The reason should be concise. If the request is for "Disapproval," "Further Study," or "Approve As Amend", identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

The public interest requires the adoption of the building standards.
The code requires relative humidity levels be maintained above 30% rH in hospital operating rooms and special procedure rooms by installing humidifiers in hospitals throughout California. The majority of California hospitals turn off the humidifiers as soon as they are approved by OSHPD. Low humidity is a comfort issue not a life safety issue, left over from the use of flammable anesthesia gases. Current practices and procedures do not create a combustible gas environment in these rooms. Periodic operation of humidifiers creates a serious infection control risk as they add moisture to ducts creating a mold enriched environment. California hospitals spend literally millions of dollars installing humidifiers that are not used. This proposed changes will allow hospitals in the state to avoid the cost of humidification.

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

(a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:

(1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.

(2) The proposed building standard is within the parameters established by enabling legislation and is not

expressly within the exclusive jurisdiction of another agency.

(3) The public interest requires the adoption of the building standards.

(4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.

(5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.

(6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.

(7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.

(A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.

(B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.

(8) The format of the proposed building standards is consistent with that adopted by the commission.

(9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.