

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED AUGUST 24, 2012
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: OCTOBER 8, 2012

Date: 5 October 2012

From:

Carol Corr
(AO) Name (Print or type)


(Signature)

KAISER PERMANENTE

Agency, jurisdiction, chapter, company, association, individual, etc.

1800 Harrison Street Oakland CA 94612
Street City State Zip

We do not agree with:

[] The Agency proposed modifications As Submitted on Section No. 1226.4.13.6.2 subsection 3

and request that this section or reference provision be recommended:

[] Approved [] Disapproved [] Held for Further Study [] Approved as Amended

Suggested Revisions to the Text of the Regulations:

1226.4.13.6 Sterilization facilities. *When provided a sterilization facility shall meet the following applicable requirements:*

~~**1226.4.13.6.1 Storage.** *Each facility shall provide space for the storage of disposable sterile supplies or provide space for sterilization and disinfection equipment.*~~

~~**Exception:** *Facilities with contractual arrangements for outside autoclaving and sterilizing services.*~~

1226.4.13.6.2 Central sterile supply and sterilizing area. *When provided, rooms and spaces of the central supply and sterilizing area shall comply with the following:*

1. Soiled work area. A receiving and gross cleaning area which shall contain work space and equipment for cleaning medical and surgical equipment and for disposal of or processing of soiled materials.
2. Clean work area. A clean work area which shall contain work space and equipment for sterilizing medical and surgical equipment and supplies.
- ~~3. Sterilizing and equipment disinfection space.~~

4. Storage. Space for sterile supplies and unsterile supplies.

Reason:

- (1) The proposed building standards conflict with, overlap, or duplicate other building standards.

The section intent is to describe sterile processing space only when an owner determines that on-site sterile processing is needed to support clinical requirements. As section 1226.4.13.5 already describes a requirement for sterile supply storage and storage for supplies within sterile processing is indicated by Section 1226.4.13.5.2.4, section 1226.4.13.6.1 is redundant and confusing.

Section 1226.4.13.6.2.3 requires a sterilizing and equipment disinfection space in addition to the soiled work area and a clean work area. We recommend striking this section as 1226.4.13.6.2.2 already includes sterilizing space. The term equipment disinfection indicates non sterile equipment co-located with sterilizers. Equipment disinfection by definition can occur in any location and by industry standards (AAMI), can never occur in a room that includes sterilizers. In a clinic environment, equipment disinfection would typically occur at the site of use.

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.