

CALIFORNIA
HEPATITIS C TASK FORCE
149 Wyndham Way, Suite 223
Petaluma, CA 94954-3875
(707) 347-9163
Fax (415) 276-5893
(EIN) TAX ID number: 92-0193770
www.californiahcvtaskforce.org

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OEHHA Sacramento Office 1001 I Street, Sacramento, CA 95814 (916) 324-7572

Wednesday, January 11, 2024.

Re: Comment for OEHHA's Scientific Review Panel Meeting on EtO

Dear Members of the California Scientific Review Panel.

I am writing today to raise concerns with OEHHA's updated inhalation unit risk (IUR) factor for EtO (ethylene oxide), a chemical used to sterilize life-saving medical devices. I appreciate the Panel's dedication to a detailed, data-driven review process. I encourage the Panel to continue to reflect on the potential consequences of the revised IUR before moving forward.

As it stands, I am concerned that the updated IUR – which currently sets an acceptable risk level that is below the levels of EtO that exist within the ambient air – could unintentionally disrupt vital services within California's health care system, specifically the availability of medical devices crucial for treating patients with serious conditions like Hepatitis C.

We cannot afford shortages or delays in the delivery of medical devices, the vast majority of which are sterilized using EtO. Such disruptions could further strain our health care system, which is already under enormous pressure.

Protecting patient access should be a priority, and I urge the Panel to keep them in mind as this process continues to move forward. Thank you for your consideration.

Sincerely,

William M. Remak, BSc, BPH, MS, MT, SGNA, AHCJ, EASL

Chair, California Hepatitis C Task Force

William M. Rama

Chair, International Association of Hepatitis Task Forces

Ambassador - Americans for Cures Foundation

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https://npin.cdc.gov/users/william-remak wmremak@IAHTF.net