

January 22, 2024

Dear Members of the California Scientific Review Panel,

Prior to the Scientific Review Panel on Toxic Air Contaminants (SRP) public meeting next month, I wanted to provide our input on behalf of Mission Community Hospital regarding OEHHA's proposed revision of the cancer inhalation unit risk (IUR) factor for Ethylene Oxide (EtO).

As the SRP continues to evaluate OEHHA's updated risk factor, the Panel should keep in mind there is no alternative to EtO for sterilizing many essential medical devices. As such, the proposed adjusted factor could inadvertently disrupt the supply of critical medical tools—affecting treatments, surgeries, and general check-ups for patients and providers across California.

Moreover, we propose a critical analysis of the relevance and merit behind the research informing the updated IUR, as OEHHA is suggesting a risk factor based on an <u>EPA assessment</u> from 2016, which significantly exceeds the current EtO ambient levels in California's communities today.

In the face of current health care challenges, including resource constraints and workforce shortages, it is essential that regulatory actions do not add to the burden by limiting access to necessary medical equipment. We trust the Panel will prioritize public health in its deliberations and ensure that any updated IUR is realistic.

Mission Community Hospital is eager to continue to engage in dialogue and collaborate with the SRP to ensure a thorough evaluation of the IUR.

Thank you,

James K. Theiring

Chief Executive Officer