



May 3, 2024

Colorado Air Quality Control Commission  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South, EDO-AQCC-A5  
Denver, Colorado 80246

Dear Colorado Air Quality Control Commission,

On behalf of Colorado Hospital Association (CHA) and its more than 100 member hospitals and health systems, I am writing to provide comments on the updates to Regulation Number 8, Parts A and E (Maximum Achievable Control Technology Standards). CHA is committed to implementing effective, pragmatic, and business-friendly policies to improve air quality, protect public health, and deliver the quality of life Coloradans deserve. Hospitals value public health and clean air for the communities and patients they serve. However, it's important that any new regulations adopted by the Commission do not disrupt the health care supply chain, which could threaten patient safety. Maintaining a robust health care supply chain has never been more important or top of mind for patients and businesses recovering from the COVID-19 pandemic.

Ethylene oxide (EtO) is a key component in medical device sterilization. Sterilization is an often overlooked, yet essential, part of the health care supply chain. Hundreds of thousands of medical processes and procedures rely on proven sterilization practices to provide patients with infection-free care. High standards for patient safety in hospitals demand the most effective methods of sterilization for medical equipment. Medical technology is an integral piece of modern medicine, and any decisions that could disrupt hospitals and other clinical settings should not be taken lightly.

In March, the Environmental Protection Agency (EPA) issued the final amendments to the air toxics standards for EtO for commercial sterilization facilities. According to the EPA, the new air pollution controls will reduce emissions from commercial sterilizers by more than 90%. **In light of this, CHA urges the Commission to prioritize public health and the importance of a functional health care supply chain and refrain from implementing any regulations that could conflict with the changes by the EPA under the National Emission Standards for Hazardous Air Pollutants (NESHAP).**

Thank you in advance for considering the hospital perspective on this matter. When dealing with issues as intricate as medical device sterilization, it is crucial to evaluate all potential impacts that new regulations could have on patients, hospitals, and local economies.

CHA looks forward to helping CDPHE navigate complex issues like this one now and in the future.

Sincerely,

A handwritten signature in black ink that reads 'Adeline Ewing'. The signature is written in a cursive, flowing style.

Adeline Ewing  
Manager, Public Policy  
Colorado Hospital Association