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July 12, 2002

MEMORANDUM

TO: Renal Dialysis Facility Administrators

FROM: Dennis L. Gibbs, Director
Division of Health Licensing

SUBJECT: Vapor Concentration Monitoring

Section 410.C of Regulation 61-97, Standards for Licensing Renal Dialysis Facilities, requires that routine monitoring of vapor concentration be conducted and recorded in writing in accordance with current OSHA guidelines.

Current OSHA standards require testing of the vapors of the sterilent agent, as required by the Material Safety Data Sheet (MSDS) for the agent used, e.g., Renalin (Peracetic acid and Hydrogen Peroxide), Formaldehyde, etc. The testing of vapor concentrations is conducted by the Time Weighted Average over an 8 hour period (TWA), or a Short Term Exposure Limit over 15 minutes (STEL), in order to meet the Permissible Exposure Limit (PEL), which is required by OSHA Standards.

Vapor testing must be conducted to establish a baseline for the type of agent used. Once the PEL for the agent is reached, i.e., parts per million (PPM of air), no further specific time frame testing is required.

Please note that further sampling would be required if there is a change in the processing procedures, a change or modification of the space being used, such as adding a wall, or a change in the agent used, again establishing a new baseline within the allowable limits for the new agent. Sampling is also required when personnel doing re-use are changed.

DLG/RAL/mm