

April 17, 2020

I am submitting this response to the proposed changes by OSHPD for the removal of 100% Outside air (OSA) column in Table 4-A to ensure compliance with the national standard of ASHRAE 170.

In my opinion this should proposed change should be rescinded.

OSHPD are tasked to make sure that healthcare in California is delivered in a safe manner. Removing this option does not help achieve that goal. In the current world we live in; healthcare would be best delivered with systems that are design around 100% OSA to help reduce cross contamination. This option has been shown to be more cost effective while delivering better contamination control. Recirculating systems are not the way to go especially with new viruses that we are being exposed to. If the column is removed we will have to provide much more OSA if we are to reduce cross contamination risks. This will ultimately cost the hospitals more in operational cost and have a long term negative affect on delivering healthcare.

There are many engineers and healthcare providers that have the opinion that ASHRAE 170 need to align with the California code.

There is no demonstrable research and or benefit for making this change.

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