



July 10, 2026

Members of the California Scientific Review Panel
c/o Office of Environmental Health Hazard Assessment
1001 I Street
Sacramento, CA 95814

RE: Resubmitted Comments on OEHHA's Inhalation Unit Risk Factor for Ethylene Oxide (EtO)

Dear Members of the California Scientific Review Panel:

On behalf of the California Chronic Care Coalition (CCCC), I am writing to resubmit and update prior comments (dated January 31, 2024) on the Office of Environmental Health Hazard Assessment's inhalation unit risk factor for ethylene oxide. CCCC represents Californians living with chronic illness. For many of the patients we serve, dependable access to sterile medical devices is a necessity of day-to-day care.

For patients managing long-term conditions, sterile devices and equipment are woven into nearly every stage of treatment and health maintenance--including routine monitoring, infection prevention, diagnostic procedures, and interventions that cannot be postponed without potentially severe consequences. When access to those tools becomes less certain, the burden falls most heavily on patients whose health already depends on consistent, timely care.

CCCC recognizes that EtO should be handled with care and subject to appropriate oversight. Nothing in these comments is intended to minimize that point. The Coalition's concern is narrower, but no less important: in reviewing OEHHA's IUR, the Panel should ensure that the scientific foundation is sound and that any downstream effects on medical device sterilization are squarely considered from the perspective of patient impact before recommendations are finalized.

EtO is an important tool for the sterilizing medical devices commonly used in hospitals, outpatient settings, and other care facilities. For some products, there are still no readily available substitutes, meaning a disruption in availability could cause a real threat to patients.

For these reasons, CCCC respectfully urges the Panel to consider solutions that will protect patients with chronic conditions. A holistic solution should address legitimate environmental exposure concerns while also preserving access to essential medical care.

CCCC appreciates the opportunity to resubmit these comments and thanks the Panel for its consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Liz Helms". The signature is fluid and cursive, with the first name "Liz" and last name "Helms" clearly distinguishable.

Liz Helms
President & CEO
California Chronic Care Coalition