



October 11, 2012

Elizabeth McAuliffe
Bureau of Air Management, Engineering & Enforcement Division
Department of Energy and Environmental Protection
79 Elm Street, 5th Floor
Hartford, CT 06106-5127

Dear Ms. McAuliffe:

The Connecticut Hospital Association (CHA), on behalf of its 29 acute care hospitals, submits the following comments regarding the proposed amendments to section 22a-174-22 of the Regulations of Connecticut State Agencies (RCSA) published in the Connecticut Law Journal on August 28, 2012. CHA supports the regulations and urges their adoption.

Proposed RCSA 22a-174-22(a), Section 2, provides an exemption to an owner or operator of a reciprocating engine or gas turbine engine, including hospitals or healthcare facilities, in order to meet the standards for emergency electrical power systems of The Joint Commission or the National Fire Protection Association. Connecticut's acute care hospitals, which are all accredited by The Joint Commission, need this exemption to avoid having to delay or reschedule the operation of an emergency engine for routine, scheduled testing or maintenance days with "unhealthy air days."

Currently, during ozone season (May 1 – September 30), Connecticut can experience an average of 40-50 days declared as unhealthy air days. This puts hospitals at frequent risk of having to skip planned generator testing schedules, which are designed to ensure safe operation of the facilities, and are required by accreditation agencies, including The Joint Commission. Significant advance planning is required for identified testing dates in order to ensure patient safety and access to care is preserved. At a minimum, the operating room and the x-ray department must put vital functions on hold for a prolonged period of time during the testing cycle. If these tests cannot be carried out due to an unhealthy air day, patients and procedures must be delayed, and operations are significantly disrupted.

The regulatory exemption afforded hospitals in proposed RCSA 22a-174-22(a) Section 2 will make certain that hospitals, and all the significant advance planning that is undertaken with prescheduled testing dates is uninterrupted, further ensuring patient safety and access to care for Connecticut's patients is protected.

We appreciate the opportunity to offer comments and thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Marielle Daniels", is written over a blue circular stamp or seal.

Marielle Daniels
Manager, Patient Care Regulation

MED:ljs
By E-Mail