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**Subject:** Thoughts on the draft  
**Date:** Monday, January 14, 2019 9:39:55 AM

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Overall, the draft hits most of the big points with regard to surgical smoke and steps employers should take but there are things that I think should be added.

Under (b) Definitions,

(9)"Surgical Plume means airborne contaminants (dusts, fumes, mists, vapors, and gases) generated during the use of energy-based medical devices, electrosurgical devices.

-Surgical plume also contains viable and non-viable cells such as blood, humanpapilloma virus, Hepatitis B virus, and Human Immunodeficiency virus.

This is why nurses are anxious about this project to move forward. There are biological contaminants in the surgical plume.

Also, it should say possible carcinogenic vapors and volatile compounds instead of just vapors. People want to know exactly is in the plume. Evidence-based studies have all identified things such as hydrogen cyanide and carbon monoxide as just a couple.

**Choi, SH, Kwon, TG, Chung, SK, & Kim, T. (2014) Surgical smoke may be a hazard to surgeons performing laparoscopic surgery. *Surgical Endoscopy*, 28. 2374-2380.**

Under (d) Control Measures:

(4) Employers shall provide and ensure employees with appropriate eye protection where visible plume may contact the eyes of an employee

-How? To date, we use plastic shields to protect our eyes from splashes but there is nothing really to keep the smoke from reaching our eyes. What you propose sounds

like it would be akin to swimmers goggles.

At our facility where I am trying to move our OR to becoming smoke free, we are getting ready to upgrade our video systems (insufflators can remove smoke from the belly in laparoscopic cases) and this will help us transition smoother than if we were starting with nothing. We currently use the LEV system for plastic cases. The video system overall will cost our facility somewhere in the \$1.5 million range. The pencils for the electrocautery only costs our facility \$23.00 from our vendor. I very much am interested in seeing where this leads. Thank you for allowing me to give my input.

Sincerely,

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