



**To:** Senator Doyle, Representative Baram and Members of the General Law Committee

**Date:** March 5, 2013

**Re:** Opposition to SB 924 (AN ACT CLARIFYING RENEWAL REQUIREMENTS FOR MEDICAL GAS AND VACUUM SYSTEMS CERTIFICATES)

The Compressed Gas Association (CGA) and the Gases and Welding Distributors Association (GAWDA) write to express concerns regarding SB 924, which proposes modifications to Section 1. Subsection (g) of section 20-334a of the general statutes related to **CLARIFYING RENEWAL REQUIREMENTS FOR MEDICAL GAS AND VACUUM SYSTEMS CERTIFICATES**. SB 924 will lead to confusion in the market and for inspectors.

CGA, founded in 1913, is dedicated to the development and promotion of safety standards and safe practices in the industrial, medical, and food gases industry. CGA represents over 120 member companies in all facets of the industry – manufacturers, distributors, suppliers, and transporters of gases, cryogenic liquids, and related products and services. Through a committee system, CGA develops technical specifications, safety standards, and training and educational materials, and works with government agencies to formulate responsible regulations and standards and to promote compliance with these regulations and standards.

GAWDA, founded in 1946, is dedicated to the safe operations and economic vitality of independent distributors of industrial and medical gases and equipment. It represents over 450 member companies and provides them with compliance assistance and guidance directly through internal consultants. It is also very active in providing training and educational materials that promote safe operations and CGMP compliance. GAWDA participates actively with the CGA and its activities to create and promote responsible regulations and standards for the industry.

CGA and GAWDA read the proposed modification to require the ASSE-6010 certification for those who work on the medical gas piping system within the health care facility. However, the proposal is overly broad and will therefore have the unintended consequence of including personnel who work on bulk medical gas supply systems that are located outside the facility and terminating at the facility's source valve. The skill sets required of bulk medical system personnel are very different yet the existing language does not accommodate this important distinction. If the legislation is enacted as currently worded, local authorities having jurisdiction (AHJs) may believe that ASSE-6010 certification requirement would also apply to personnel who install and maintain bulk medical gas supply systems (e.g., bulk oxygen tanks).

At a minimum, this bill should align with industry standards and national model codes, and it must therefore draw a distinction between medical gas piping within the health care facility, on the one hand, and bulk medical gas supply systems on the other. We nevertheless offer our expertise to assist legislators in carefully drafting important legislation that is mindful of the critical industry standards that ensure the safety of medical patients while helping to achieve the purported goals of SB 924.

Sincerely,

Michael Tiller  
President and CEO  
Compressed Gas Association

Craig Wood  
President  
Gases and Welding Distributor Association