



APPA Town Hall ANSI/ISEA Z-358.1 - American National Standard for Emergency Eyewash and Shower Equipment

Reaffirmation vs. Revision



Panelists

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- Mary Beth Koza, Treasurer - Division of Chemical Health & Safety of the ACS , Chair Elect –NC ACS Local Section (University of North Carolina – Chapel Hill retired)
 - Samuella (Sammye) Sigmann, Immediate Past Chair, ACS Division of Chemical Health & Safety, Director of Stockroom Operations, Chemistry, Appalachian State University
 - Markus Schaufele, MS, CSP, Manager, Standards, Compliance and Emergency Planning, Research Safety, Northwestern University

2014 Revision of ISEA Z 358.1

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- The Z358.1 American National Standard for Emergency Eyewash and Shower Equipment went through the prescribed approval process with participation of representatives from the University of Georgia, the University of Michigan, Evergreen State College, APPA and others. At the time the 2014 Standard's language was discussed, APPA and the University of Michigan Hospitals and Healthcare Centers advocated for less than weekly activation of water flushing devices described by the standard. The University of Michigan cited a water quality study by Chuanwu Xi, PhD, titled "Survey of Water Quality in Eye Washing Stations at the University of Michigan" substantiating this request.

ISEA Response

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- The secretariat (ISEA) rejected this change proposal stating¹ “Until additional information or peer reviewed studies can be identified and validated, the standard drafting group is unwilling to change the long-established weekly interval for operational verification, which has existed since 1981 version. For a subsequent revision cycle, ISEA may pursue identification of resources and other related documentation that can assist in making an informed justification of such a change. This will also allow time to explore the possible change with all stakeholders who utilize, install or regulate emergency eyewash and shower equipment.”

¹Cristine Fargo, ISEA to Bruce Cadwallander, University of Michigan Hospitals and Healthcare Centers, Re: Response to Negative ballot on Revised Standard ANSI/ISEA Z358.1; Sep 11, 2014

2016 Survey of APPA Members

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- In preparation for the 2019 Standard review APPA conducted a nine question survey of its members which was specifically focused on inspection of eyewash and showers. A similar survey was also distributed by the Campus Safety Health and Environmental Management Association (CSHEMA).

December 2, 2016 Discussion Points

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- Testing: What is the difference between “testing”, “certification”, and “activation”? This is not clear in the current standard. If “certification” is a word used only by the manufacturers to ensure that their products meet ANSI Z358.1 this needs to be addressed.
 - Sustainability and zero waste (environmental impact). How much water is needed to even test unit?

December 2, 2016 Discussion Points

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- Inspection: Requested clarification of the expectation. Provide options for best practices or performance based on site specifics.
 - Regulatory bodies such as the Occupational Safety & Health Administration (OSHA) and the Joint Commission (formally the Joint Commission on Accreditation of Healthcare Organizations, JCAHO) requesting documentation of compliance which is an issue with the weekly testing requirement.

December 2, 2016 Discussion Points (cont'd)

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- ADA compliance- Very open to the edits provided by DCHAS.
 - Suggested applicable sections in [ICC ANSI A117.1 – 2009](#) and 2010 [ADA Standards for Accessible Design](#) for cross reference to Improve Access to Safety Showers and Eyewash Stations.
 - Provided a marked copy of ANSI/ISEA Z-358.1 to the committee showing where the standard could be improved regarding access and use for those with disabilities.

December 2, 2016 Discussion Points (cont'd)

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- Hand warm (tepid) water requirement and the quality of water: Standard requires connection to potable water. There is the potential for issues and fear Legionella and opportunistic pathogen growth in tepid water environments. Current data on device activation reducing growth would be welcome.
 - Extensive discussion on safety shower drainage language into the code or best practices document for new construction. Retrofitting for drainage is not practical or needed.

December 2, 2016 Discussion Points (cont'd)

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- Selection: When is it needed and what types of equipment are needed (is there an expectation that the standard would address since it does include installation / implementation requirements, that are end-user dependent?)
The current Appendix dabbles in the aspect of where showers and eyewashes need to be included. Is there opportunity to expand?

December 2, 2016 Discussion Points (cont'd)

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- Extensive discussion if the standard prescribed lab design and rigid safety shower performance placement mandates actually lead to significant benefits in non-industrial lab settings.
 - With generic hazard language that applies to water flushing devices from 0.4gal -20 gal water flow, especially the selection of eyewash versus eye/face wash is unclear. Perhaps opportunity to clarify application and expectation of the device.

Conclusion

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- Since December 2, 2016, there has been no action on revising the standard.
 - ISEA announced through ANSI Standards Action they were withdrawing the PINS (Project Initiation Notice System) for revision.
 - Through communication with ISEA it has been learned that they are taking action to reaffirm the standard (no changes to the document).

Definition of Reaffirmation

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- Reaffirmation - no substantive changes made to the current document.


ANSI Definition of Substantive Change

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- Substantive Change: A substantive change in a proposed American National Standard is one that directly and materially affects the use of the standard.

Examples of substantive changes are below:

- - addition, deletion or revision of requirements, regardless of the number of changes;
- - addition of mandatory compliance with referenced standards;
- “shall” to “should” or “should” to “shall”.

Definition of Revision

 **re·vi·sion**
/rē'viZHən/

noun

the action of revising.
"the plan needs drastic revision"

Similar: emendation correction alteration changing adaptati

• a revised edition or form of something.
plural noun: **revisions**

Similar: version corrected version edition rewrite reworkin

Revision - make changes to it in order to improve it, make it more modern, or make it more suitable for a particular purpose.



Outcome From Today's Town Hall

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- The members of the panel are asking the attendees to send an email to Billie Zidek at billie@appa.org confirm your desire for APPA to agree with the reaffirmation or to disagree and request ISEA begin revising the standard.
 - APPA staff will create a comment for submission to ISEA and ANSI with all the submitters' affiliations.
 - The members of the panel will be going back to their organizations and asking their members to do the same.