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To: NIOSH Docket Office (CDC)
Subject: 105a - Haz Drug Appx A Rev

I would recommend to leave BCG in appendix A as a hazardous drug. If it is removed, I am concerned that it would open the door to allow preparation in the same hood a chemotherapy. As a pharmacist who has prepared BCG and chemotherapy, I have concerns wether adequate terminal cleaning can be done to prevent potential cross contamination. I feel this is supported by documentation in the product literature that BCG should not be mixed in the same area as other parenteral drugs.

I do recall case reports of BCG exposure to children that received chemotherapy prepared in the same hood as BCG. (Stone/Vaner/Storch et al NEJM 1995;)

Thank you
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