Message

From:	/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B5A9A34E31FC4FE6B2BEADDDA2AFFA44-HARLOW, DAV [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B5A9A34E31FC4FE6B2BEADDDA2AFFA44-HARLOW, DAV]
on behalf of	Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent:	2/19/2019 12:17:02 PM
To:	Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]
Subject:	FW: Call with Phil MacNabb re: Sterigenics
Attachments:	Call with Phil MacNabb re: Sterigenics

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 1/29/2019 9:59:46 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]; Lyons, Troy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=15e4881c95044ab49c6c35a0f5eef67e-Lyons, Troy]; Palich, Christian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=330ad62e158d43af93fcbbece930d21a-Palich, Chr]
Subject: Duckworth Letter
Attachments: 19.01.29- Letter to EPA opposing RTR on HCL that undermines ETO risk assessment.pdf; ATT00001.txt

Bill,
As mentioned earlier:

https://www.duckworth.senate.gov/imo/media/doc/19.01.29-%20Letter%20to%20EPA%20opposing%20RTR%20on%20HCL%20that%20undermines%20ETO%20risk%20assessment.pdf

Message

From: /O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B5A9A34E31FC4FE6B2BEADDDA2AFFA44-HARLOW, DAV [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B5A9A34E31FC4FE6B2BEADDDA2AFFA44-HARLOW, DAV]
on behalf of Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent: 12/18/2018 12:11:20 PM
To: Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]
Subject: FW: EPA webinar: Update on Ethylene Oxide Monitoring in Willowbrook, Illinois
Attachments: EPA webinar: Update on Ethylene Oxide Monitoring in Willowbrook, Illinois

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 2/13/2019 9:52:07 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]; Schwab, Justin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=eed0f609c0944cc2bbdb05df3a10aadb-Schwab, Jus]
Subject: Fwd: Sterigenics - foundational support for USEPA's sampling data

1/2

Begin forwarded message:

From: "Koerber, Mike" <Koerber.Mike@epa.gov>
Date: February 13, 2019 at 4:04:29 PM EST
To: "Woods, Clint" <woods.clint@epa.gov>
Cc: "Tsirigotis, Peter" <Tsirigotis.Peter@epa.gov>
Subject: Fwd: Sterigenics - foundational support for USEPA's sampling data

Let me know how you want to handle this. Thanks.

Sent from my iPhone

Begin forwarded message:

From: "Nelson, Leverett" <nelson.leverett@epa.gov>
Date: February 13, 2019 at 4:00:00 PM EST
To: "Koerber, Mike" <Koerber.Mike@epa.gov>
Cc: "Rountree, Jillian" <Rountree.Jillian@epa.gov>, "Woods, Clint" <woods.clint@epa.gov>, "Stepp, Cathy" <stepp.cathy@epa.gov>, "Thiede, Kurt" <thiede.kurt@epa.gov>, "Nam, Ed" <nam.ed@epa.gov>
Subject: RE: Sterigenics - foundational support for USEPA's sampling data

Mike-

Attorney Client / Ex. 5

Thank you.

-Rett Nelson

T. Leverett Nelson
Regional Counsel
U.S. EPA, Region 5
Chicago, IL
Tel.: 312-886-6666

From: Wallace, Elizabeth <EWallace@atg.state.il.us>
Sent: Wednesday, February 13, 2019 1:40 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>
Cc: Nelson, Leverett <nelson.leverett@epa.gov>; Rountree, Jillian <Rountree.Jillian@epa.gov>; John.J.kim@illinois.gov; Dunn, Matthew <MDunn@atg.state.il.us>; Woods, Clint <woods.Clint@epa.gov>
Subject: RE: Sterigenics - foundational support for USEPA's sampling data

Thanks Mike.

From: Koerber, Mike [mailto:Koerber.Mike@epa.gov]
Sent: Wednesday, February 13, 2019 1:38 PM
To: Wallace, Elizabeth <EWallace@atg.state.il.us>
Cc: Nelson, Leverett <nelson.leverett@epa.gov>; Rountree, Jillian <Rountree.Jillian@epa.gov>; John.J.kim@illinois.gov; Dunn, Matthew <MDunn@atg.state.il.us>; Woods, Clint <woods.clint@epa.gov>
Subject: Re: Sterigenics - foundational support for USEPA's sampling data

Thank you, Elizabeth. I will be back in touch with you soon.

Mike

Sent from my iPhone

On Feb 13, 2019, at 12:34 PM, Wallace, Elizabeth <EWallace@atg.state.il.us> wrote:

> Hello Mike:
>
> During a recent conference call among USEPA, IEPA and our Office, USEPA renewed its commitment to work with and assist the State of Illinois with respect to ethylene oxide emissions from the Sterigenics facility in Willowbrook. As a follow up to that conversation, we are reiterating our request for USEPA's assistance with the air sampling data obtained by the Agency in its sampling efforts around the Sterigenics facility in the event that we seek to use this data in our pending litigation.
>
> Specifically, we ask that USEPA provide the foundational support through testimony at any hearing in the case that will allow the

State to meet the applicable evidentiary requirements to seek the admission of the sampling results in evidence.

Please let us know when you are available to discuss how we can move forward on this request.

Thank you for your assistance and I look forward to hearing from you.

Beth

Elizabeth Wallace, Chief
Environmental Bureau / Chicago
Office of the Illinois Attorney General
69 W. Washington St., 18th Flr.
Chicago, IL 60602
(312)814-5396
(312)814-2347 (fax)
ewallace@atg.state.il.us

Message

From: DeLuca, Isabel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0B021C30CBEE4637A7C7CA683E5E044A-IDELUCA]
Sent: 11/29/2018 9:12:20 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]
Subject: RE: Bill's calendar 11/12-11/23

Great – thanks all. I'll update the list.

From: Wehrum, Bill
Sent: Thursday, November 29, 2018 4:08 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Cc: Harlow, David <harlow.david@epa.gov>; DeLuca, Isabel <DeLuca.Isabel@epa.gov>; Atkinson, Emily <Atkinson.Emily@epa.gov>
Subject: Re: Bill's calendar 11/12-11/23

Yes, correct.

_____
Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

On Nov 29, 2018, at 2:06 PM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:

> Bill – on the 13th I think we should have two entries for the time you spent at the WH. Can you confirm the 11 am entry immediately below is correct?
>
> 11/13/2018 10:30AM Interagency meeting The White House
>
> 11/13/2018 11 AM Videoconference with CARB The White House
>
> ---
>
> **From:** Harlow, David
> **Sent:** Thursday, November 29, 2018 11:11 AM
> **To:** DeLuca, Isabel <DeLuca.Isabel@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>; Atkinson, Emily <Atkinson.Emily@epa.gov>
> **Subject:** RE: Bill's calendar 11/12-11/23
>
> Looks good to me. Thanks.
>
> **David S. Harlow**
> **Senior Counsel**

Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
WJC-N Room 5409K
1200 Pennsylvania Avenue NW
Washington, DC 20460
202-564-1233
Harlow.David@epa.gov

From: DeLuca, Isabel
Sent: Thursday, November 29, 2018 11:01 AM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>; Harlow, David <harlow.david@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>; Atkinson, Emily <Atkinson.Emily@epa.gov>
Subject: Bill's calendar 11/12-11/23

Hi all,
It's calendar week once again. Bill's calendar for 11/12-11/23 is pasted below for review. Please let me know if you have any questions or edits.

Many thanks,
Isabel

11/12/2018		Federal Holiday
11/13/2018	9:00AM	Call with POET
11/13/2018	9:30AM	Meeting with Sterigenics
11/13/2018	10:30AM	Interagency meeting
11/13/2018	12:30PM	Speaking engagement: Truck and Engine Manufacturers Association Diesel Technology Forum
11/13/2018	3:00PM	Cleaner Trucks Initiative Event
11/13/2018	5:00PM	Meeting at USDA with Secretary Purdue
11/13/2018	6:00PM	Staff briefing
11/14/2018	9:30AM	Speaking engagement: Association of Air Pollution Control Agencies 2018 Fall Business Meetir
11/14/2018	11:00AM	Staff briefings
11/15/2018	9:30AM	Staff briefing
11/15/2018	10:15AM	Call with U.S. Commodity Futures Trading Commission
11/15/2018	12:00PM	Meeting with National Oilseed Processors Association
11/15/2018	1:15PM	Staff briefing
11/15/2018	2:00PM	Meeting with Motor and Equipment Manufacturers Association
11/15/2018	3:00PM	Staff briefings
11/16/2018	8:30AM	Staff briefing
11/16/2018	11:00AM	Interagency meeting
11/16/2018	1:30PM	Staff briefings
11/16/2018	5:00PM	Interagency meeting
11/19/2018	11:30AM	Meeting with Air-Conditioning, Heating, and Refrigeration Institute
11/19/2018	1:00PM	Meeting with Hudson Technologies
11/19/2018	2:00PM	Staff briefing
11/19/2018	3:00PM	Meeting with Federal Railroad Administration
11/19/2018	4:00PM	Call with Sterigenics
11/19/2018	4:30PM	Staff briefing
11/20/2018	9:00AM	Staff briefings

11/20/2018	4:00PM	Interagency conference call
11/21/2018	9:00AM	Staff briefings
11/21/2018	12:30PM	Meeting with Department of Justice
11/22/2018		No scheduled meetings
11/23/2018		No scheduled meetings

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 9/26/2018 1:00:51 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]
Subject: RE: RE:
Attachments: Background Materials for Willowbrook -9-26-18 draft.docx

Deliberative Process / Ex. 5

Clint Woods
Deputy Assistant Administrator
Office of Air and Radiation, U.S. EPA
202.564.6562

From: Woods, Clint
Sent: Tuesday, September 25, 2018 6:05 PM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Harlow, David <harlow.david@epa.gov>
Subject: Fwd: RE:

Deliberative Process / Ex. 5

Begin forwarded message:

From: "Woods, Clint" <woods.clint@epa.gov>
Date: September 25, 2018 at 9:40:19 AM EDT
To: "Orme-Zavaleta, Jennifer" <Orme-Zavaleta.Jennifer@epa.gov>, "Jackson, Ryan" <jackson.ryan@epa.gov>
Subject: RE:

Deliberative Process / Ex. 5

-----Original Message-----
From: Orme-Zavaleta, Jennifer
Sent: Tuesday, September 25, 2018 6:21 AM
To: Jackson, Ryan <jackson.ryan@epa.gov>
Cc: Woods, Clint <woods.clint@epa.gov>
Subject: Re:

Deliberative Process / Ex. 5

Jennifer Orme-Zavaleta, PhD
Principal Deputy Assistant Administrator for Science Office of Research and Development US EPA Cell

919-699-1564 DC 202-564-6620 RTP 919-541-2283

On Sep 24, 2018, at 7:34 PM, Jackson, Ryan <jackson.ryan@epa.gov> wrote:

Deliberative Process / Ex. 5

Ryan Jackson
Chief of Staff
U.S. EPA
202-564-6999

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 12/13/2018 8:42:57 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]
Subject: Latest data
Attachments: willowbrook sum november 2018.pdf

Deliberative Process / Ex. 5

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 2/25/2019 2:18:09 PM
To: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]
CC: Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]
Subject: Re: Sterigenics U.S. LLC v. Kim et al motion for miscellaneous relief

Thanks so much - We're hoping to tag up and find some time to touch base with R5

On Feb 25, 2019, at 8:50 AM, Koerber, Mike <Koerber.Mike@epa.gov> wrote:

> Clint, David – I see that our 1-on-1 for today was cancelled. The only time-sensitive issue I had was the request from the IL AG – see below. Please advise as to next steps. Thanks.
>
> Mike
>
> ---
>
> **From:** Koerber, Mike
> **Sent:** Sunday, February 24, 2019 10:04 AM
> **To:** Wallace, Elizabeth <EWallace@atg.state.il.us>
> **Cc:** Nelson, Leverett <nelson.leverett@epa.gov>; Dunn, Matthew <MDunn@atg.state.il.us>; Armitage, Julie <Julie.Armitage@Illinois.gov>; Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Woods, Clint <woods.Clint@epa.gov>
> **Subject:** Re: Sterigenics U.S. LLC v. Kim et al motion for miscellaneous relief
>
> Beth: Got it. We will be back in touch shortly.
>
> Mike
>
> Sent from my iPhone
>
> On Feb 24, 2019, at 9:29 AM, Wallace, Elizabeth <EWallace@atg.state.il.us> wrote:
>
>> Good morning. Next up in the Seal Order case brought by Sterigenics against John Kim/IEPA, we will be before the federal judge on Tuesday, 2/26, on Sterigenics' motion to set a hearing date for the Preliminary Injunction hearing. Attached is the motion and notice. Just fyi, we (the State) also filed a Motion to Dismiss Sterigenics' case in federal court.
>>
>> We are preparing for the Preliminary Injunction hearing which is essentially a trial put together and held in a very short period of time. We will need to put the USEPA's sample results into evidence and will need testimony from someone who was involved with taking the samples, and someone from the lab who oversees the analytical process.

Consistent with your public statements that USEPA is working very closely with the State on this matter, we appreciate your assistance on providing the support necessary to get USEPA's sample results into evidence.

I look forward to hearing from you and thank you.

Beth Wallace

312-814-5396

From: usdc_ecf_ilnd@ilnd.uscourts.gov <usdc_ecf_ilnd@ilnd.uscourts.gov>
Sent: Thursday, February 21, 2019 7:12 PM
To: ecfmail_ilnd@ilnd.uscourts.gov
Subject: Activity in Case 1:19-cv-01219 Sterigenics U.S. LLC v. Kim et al motion for miscellaneous relief

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended. ***NOTE TO PUBLIC ACCESS USERS* Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.**

United States District Court

Northern District of Illinois - CM/ECF LIVE, Ver 6.2.2

Notice of Electronic Filing

The following transaction was entered by Kelly, Gerard on 2/21/2019 at 7:12 PM CST and filed on 2/21/2019

Case Name:	Sterigenics U.S. LLC v. Kim et al
Case Number:	1:19-cv-01219
Filer:	Sterigenics U.S. LLC
Document Number:	29

Docket Text:
MOTION by Plaintiff Sterigenics U.S. LLC For Status Conference To

Set A Hearing Date On Motion For Preliminary Injunction (Kelly, Gerard)

1:19-cv-01219 Notice has been electronically mailed to:

Daniel Isaac Rottenberg drottenberg@atg.state.il.us

Elizabeth A. Wallace ewallace@atg.state.il.us

Elizabeth M. Chiarello echiarello@sidley.com, efilingnotice@sidley.com, elizabeth-chiarello-8282@ecf.pacerpro.com

Gerard David Kelly gkelly@sidley.com, efilingnotice@sidley.com, gerard-kelly-0262@ecf.pacerpro.com

Kate F Lambert klambert@sidley.com, efilingnotice@sidley.com, kate-lambert-5694@ecf.pacerpro.com

Maja C. Eaton meaton@sidley.com, efilingnotice@sidley.com, jbuss@sidley.com, maja-eaton-6947@ecf.pacerpro.com

Matthew Joseph Dunn mdunn@atg.state.il.us

Stephanie C. Stern sstern@sidley.com, efilingnotice@sidley.com, stephanie-stern-2291@ecf.pacerpro.com

Stephen J. Sylvester ssylvester@atg.state.il.us

1:19-cv-01219 Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description: Main Document
Original filename:n/a
Electronic document Stamp:
[STAMP dcecfStamp_ID=1040059490 [Date=2/21/2019] [FileNumber=20146106-0]
[41a7552c71a5be4080066fcb71d93b02c1341befc30a4c37b11eef3a6f693f44dd0dec3174e4792df05b04d94867439db22cfb12abe839e7444cc1cbc32f4ce9]]

<190221- Motion for a Status Conference to Set a Hearing Date on Motion for PI.pdf>

<190221- Notice of Motion for a Status Conference to Set Hearing Date on Motion for PI.pdf>

Message

From: Harlow, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B5A9A34E31FC4FE6B2BEADDDA2AFFA44-HARLOW, DAV]
Sent: 11/1/2018 9:51:20 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]
Subject: RE: Democrats seek IG review of EPA's handling of Sterigenics data | InsideEPA.com

Deliberative Process / Ex. 5

David S. Harlow
Senior Counsel
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
WJC-N Room 5409K
1200 Pennsylvania Avenue NW
Washington, DC 20460
202-564-1233
Harlow.David@epa.gov

From: Woods, Clint
Sent: Thursday, November 1, 2018 5:36 PM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>; Harlow, David <harlow.david@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>
Subject: Democrats seek IG review of EPA's handling of Sterigenics data | InsideEPA.com

https://insideepa.com/daily-feed/democrats-seek-ig-review-epas-handling-sterigenics-data

Democrats seek IG review of EPA's handling of Sterigenics data

Illinois Democrats are urging EPA's Inspector General to investigate whether EPA "intentionally withheld" public release of data that came to light eight months ago indicating an increased cancer risk from ethylene oxide (EtO) releases from a Chicago-area Sterigenics sterilizing plant.

"We are concerned that the agency failed to take swift action to protect the health of a community that suffers from some of the highest cancer risks in the nation," Sens. Dick Durbin (D-IL) and Tammy Duckworth (D-IL) and Rep. Bill Foster (D-IL) write EPA Acting Inspector General Charles Sheehan in a Nov. 1 letter.

"An investigation is necessary to determine whether proper measures were taken to protect the lives of those affected by EtO emissions from the facility, to hold officials accountable, and to assure that proper protocol is followed in the future if any similar situation arises," the Democrats argue.

The lawmakers also appear to make the case for a broad policy agenda they are urging EPA to adopt to more strictly regulate and monitor EtO releases, including ensuring its pending review of EtO air toxics rules results in measures that protect vulnerable populations; prioritizing monitoring and community alerts; and, creating an inventory of potential exposures for communities adjacent to sites where EtO is used.

"Making certain that proper action is taken when it is discovered that a community is facing a public health risk, is essential for the public to have confidence that the EPA is doing its job," they write.

EtO is commonly used as an intermediate to make other chemical products like detergent, antifreeze and polyester, and to sterilize medical equipment and foods, though the chemical has long been suspected of causing breast and lymph cancers.

EPA's 2016 Integrated Risk Information System (IRIS) assessment affirmed those links and recommended conservative risk values that are expected to drive strict stricter regulatory standards. But industry representatives say that regulators should not impose overly stringent requirements. They argue EtO's use as a sterilizer is critical because it is the only way some medical devices can be sterilized without damaging them.

But when the IRIS values were combined with modeling data in EPA's latest National Air Toxics Assessment, released last August, they show "that DuPage County residents have an increased cancer risk from EtO exposure," the lawmakers write.

However, a recent report from the *Chicago Tribune*, citing EPA documents, showed that the agency first informed company and state officials about those risks last December, months before it informed the public.

"In December 2017, EPA sent a letter to Sterigenics linking high cancer risks in the area to EtO emissions from the facility. However, EPA decided to withhold this vital information from the public for eight months," they write.

EPA has pushed back on the allegations, alleging that the reporting is misleading, and has sought to downplay any concerns. "When informed in June 2018 of Region 5's monitoring results, EPA

leadership acted decisively, working with state and local governments and others to lower EtO emissions at the facility and communicate risk to the public in a responsible way," EPA said in an Oct. 30 statement.

Among other "decisive" actions, EPA says its officials reviewed and approved Sterigenics' permit to add pollution control equipment on the facility last summer, and is reviewing the results of stack tests taken last month by the company's consultant.

Related News | Air | Toxics |

Message

From: Harlow, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B5A9A34E31FC4FE6B2BEADDDA2AFFA44-HARLOW, DAV]
Sent: 2/6/2019 9:26:41 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: FW: compilation on questions from webinar
Attachments: Willowbrook 2-5 Q A.rtf

Clint,

Deliberative Process / Ex. 5

David S. Harlow
Senior Counsel
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
WJC-N Room 5409K
1200 Pennsylvania Avenue NW
Washington, DC 20460
202-564-1233
Harlow.David@epa.gov

From: DeLuca, Isabel
Sent: Wednesday, February 6, 2019 1:53 PM
To: Harlow, David <harlow.david@epa.gov>
Subject: compilation on questions from webinar

Hi David,
Just for your awareness, attached is a list of the questions and comments that came in through the webinar chat box yesterday.

Deliberative Process / Ex. 5

Thanks,
Isabel

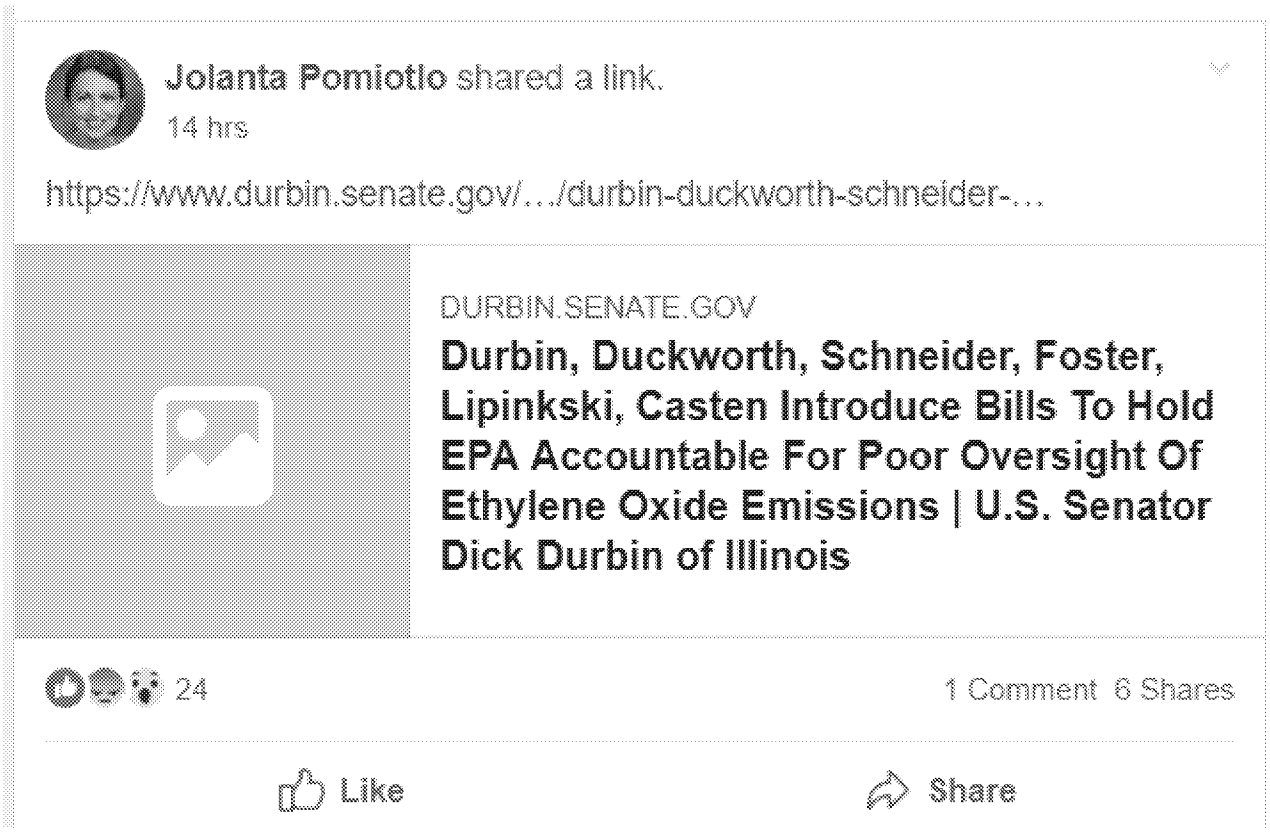
Isabel DeLuca
Office of Air and Radiation, US EPA
(202) 343-9247

Message

From: Harlow, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B5A9A34E31FC4FE6B2BEADDDA2AFFA44-HARLOW, DAV]
Sent: 2/13/2019 7:17:52 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Dominguez, Alexander [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5ced433b4ef54171864ed98a36cb7a5f-Dominguez,]; Lyons, Troy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=15e4881c95044ab49c6c35a0f5eef67e-Lyons, Troy]
Subject: RE: 19.02.13 - Wheeler Sterigenics.pdf

Alison,

Thanks. I'd seen a reference to this on the "Stop Sterigenics" Facebook page when I took a look at it this morning (as I've started to do routinely now), but I hadn't bothered to track down the letter itself.



Also, fyi (although you may already be aware), speaking of the "Stop Sterigenics" Facebook page, within the last hour, this was posted:

RECENT ACTIVITY

Stop Sterigenics
47 mins

Watch CBS Chicago tonight at 6 pm cst.

Dave Savini will be sharing more interviews of victims and exposing the truth about Sterigenics. Is Sterigenics under Criminal Investigation? Tune in tonight!

***time was changed from 5 to 6.

51 7 Comments 18 Shares

Like Share

David S. Harlow
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Immediate Office of the Assistant Administrator
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WJC-N Room 5409K
1200 Pennsylvania Avenue NW
Washington, DC 20460
202-564-1233
Harlow.David@epa.gov

From: Woods, Clint
Sent: Wednesday, February 13, 2019 1:27 PM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>; Harlow, David <harlow.david@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; Lyons, Troy <lyons.troy@epa.gov>
Subject: FW: 19.02.13 - Wheeler Sterigenics.pdf

From: Davis, Alison
Sent: Wednesday, February 13, 2019 12:37 PM
To: Woods, Clint <woods.Clint@epa.gov>
Cc: Koerber, Mike <Koerber.Mike@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>
Subject: 19.02.13 - Wheeler Sterigenics.pdf

FYI. Making you aware of this, which we received from a citizen today.

Message

From: Harlow, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B5A9A34E31FC4FE6B2BEADDDA2AFFA44-HARLOW, DAV]
Sent: 9/26/2018 12:30:26 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: A couple of notes re your Wednesday calendar

Yep, just saw that. Thank you.

David S. Harlow
Senior Counsel
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WJC-N Room 5409K
1200 Pennsylvania Avenue NW
Washington, DC 20460
202-564-1233
Harlow.David@epa.gov

-----Original Message-----
From: Lewis, Josh
Sent: Wednesday, September 26, 2018 8:08 AM
To: Harlow, David <harlow.david@epa.gov>
Subject: RE: A couple of notes re your Wednesday calendar

Just added you to both

-----Original Message-----
From: Harlow, David
Sent: Tuesday, September 25, 2018 4:36 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Cc: Wehrum, Bill <Wehrum.Bill@epa.gov>; Woods, Clint <woods.clint@epa.gov>
Subject: RE: A couple of notes re your Wednesday calendar

Josh,

I'd like to be included on the 9:30 a.m. and 1:00 p.m. meetings tomorrow if Bill is cool with that. (I've got a conflict with respect to the 10:00 a.m. meeting, however).

Thanks.

David S. Harlow
Senior Counsel
Immediate Office of the Assistant Administrator Office of Air and Radiation, USEPA WJC-N Room 5409K
1200 Pennsylvania Avenue NW
Washington, DC 20460
202-564-1233
Harlow.David@epa.gov

-----Original Message-----
From: Lewis, Josh
Sent: Tuesday, September 25, 2018 4:06 PM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>
Cc: Atkinson, Emily <Atkinson.Emily@epa.gov>; Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Woods, Clint <woods.clint@epa.gov>; Harlow, David <harlow.david@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; Millett, John <Millett.John@epa.gov>; Shaw, Betsy <Shaw.Betsy@epa.gov>; Shoaff, John <Shoaff.John@epa.gov>; DeLuca, Isabel <DeLuca.Isabel@epa.gov>
Subject: A couple of notes re your Wednesday calendar

Bill,

You'll see you have 3 ethylene oxide meetings on your calendar for tomorrow:

- Dan Cronin, Chairman of the DuPage County, IL Board at 9:30. This will include OAQPS by video

- Cathy Steppe and Kurt Thiede at 10. Just you and Clint
want)

Deliberative Process / Ex. 5

- Sterigenics at 1. Tom Roberts from Van Ness Feldman will be coming with 2-3 executives from Sterigenics. Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

We'll have hard copies of materials for your other Wednesday meetings in the morning. Safe travels back to dc

Message

From: Harlow, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B5A9A34E31FC4FE6B2BEADDDA2AFFA44-HARLOW, DAV]
Sent: 12/13/2018 8:21:01 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Sterigenics-related: two guidance documents to be aware of
Attachments: guide-sec303-rpt.pdf; 1999 Section 303 Guidance.pdf

Clint,

Both of these guidance documents speak to EPA's authority under CAA § 303.

David S. Harlow
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Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
WJC-N Room 5409K
1200 Pennsylvania Avenue NW
Washington, DC 20460
202-564-1233
Harlow.David@epa.gov

Message

From: Harlow, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B5A9A34E31FC4FE6B2BEADDDA2AFFA44-HARLOW, DAV]
Sent: 2/5/2019 12:05:59 PM
To: DeLuca, Isabel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b021c30cbee4637a7c7ca683e5e044a-IDELUCA]
CC: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Millett, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c067caa6c93544f78c26ab08cc567d27-Millett, John]
Subject: RE: Bill's calendar 12/24-2/1

Isabel,

Thanks. I had figured you already something like that in mind.

David S. Harlow
Senior Counsel
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
WJC-N Room 5409K
1200 Pennsylvania Avenue NW
Washington, DC 20460
202-564-1233
Harlow.David@epa.gov

From: DeLuca, Isabel
Sent: Monday, February 4, 2019 7:51 PM
To: Harlow, David <harlow.david@epa.gov>
Cc: Wehrum, Bill <Wehrum.Bill@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>; Millett, John <Millett.John@epa.gov>
Subject: Re: Bill's calendar 12/24-2/1

Deliberative Process / Ex. 5

On Feb 4, 2019, at 6:13 PM, Harlow, David <harlow.david@epa.gov> wrote:

Isabel,

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

David S. Harlow
Senior Counsel
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
WJC-N Room 5409K
1200 Pennsylvania Avenue NW
Washington, DC 20460
202-564-1233
Harlow.David@epa.gov

From: DeLuca, Isabel
Sent: Monday, February 4, 2019 3:09 PM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>
Cc: Harlow, David <harlow.david@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>; Millett, John <Millett.John@epa.gov>
Subject: Bill's calendar 12/24-2/1

Hi all,
Below is Bill's calendar from December 24th through last Friday. Please let me know if you have any questions or concerns!

Many thanks,
Isabel

12/24/2018		No scheduled meetings	
12/25/2018		No scheduled meetings	
12/26/2018		No scheduled meetings	
12/27/2018		No scheduled meetings	
12/28/2018		No scheduled meetings	
12/31/2018		No scheduled meetings	
1/1/2019		No scheduled meetings	
1/2/2019		No scheduled meetings	
1/3/2019		No scheduled meetings	
1/4/2019	2:00PM	Interagency Meeting	The White House
1/4/2018	4:30PM	Staff briefing	EPA Headquarters
1/7/2019		No scheduled meetings	
1/8/2019		No scheduled meetings	
1/10/2019		No scheduled meetings	
1/11/2019		No scheduled meetings	
1/14/2019		No scheduled meetings	
1/15/2019	8:30AM	Staff briefings	EPA Headquarters
1/16/2019	3:30PM	Interagency Call	EPA Headquarters
1/16/2019	4:00PM	Staff briefing	EPA Headquarters
1/17/2019		No scheduled meetings	
1/18/2019	8:30AM	Staff briefing	EPA Headquarters
1/18/2019	11:15AM	Meeting with Resolute Forest Products	Washington, DC

1/18/2019	1:00PM	Interagency Call	EPA Headquarters
1/21/2019		No scheduled meetings	
1/22/2019		No scheduled meetings	
1/23/2019	2:15PM	Staff briefings	EPA Headquarters
1/24/2019	11:00AM	Staff briefing	EPA Headquarters
1/24/2019	1:30PM	Interagency meeting	The White House
1/25/2019	2:00PM	Staff briefing	EPA Headquarters
1/25/2019	3:00PM	Speaking Engagement: Society of Environmental Journalists	Washington, DC
1/25/2019	4:45PM	Staff briefing	EPA Headquarters
1/28/2019	9:30AM	Staff briefings	EPA Headquarters
1/28/2019	4:30PM	Meeting with Senator Alexander	Dirksen Senate Office Building, Wa
1/28/2019	5:30PM	Call with Sterigenics	EPA Headquarters
1/29/2019	9:00AM	Staff briefing	EPA Headquarters
1/29/2019	10:45PM	Meeting with Michael Petras (Sotera Health) and Tom Roberts	EPA Headquarters
1/29/2019	11:15AM	Staff briefing	EPA Headquarters
1/29/2019	1:00PM	Speaking engagement: National Association of Clean Air Agencies	Washington, DC
1/29/2019	2:30PM	Staff briefing	Washington, DC
1/30/2019	8:45AM	Staff briefings at EPA's Research Triangle Park offices	Research Triangle Park, NC
1/31/2019	9:00AM	Staff briefings at EPA's Ann Arbor Lab	Ann Arbor, MI
2/1/2019	9:30AM	Staff briefings	EPA Headquarters
2/1/2019	11:00AM	Media Interview	EPA Headquarters
2/1/2019	11:15AM	Staff briefings	EPA Headquarters
2/1/2019	2:45PM	Call with Department of Energy Undersecretary Mark Menezes	EPA Headquarters
2/1/2019	3:30PM	Staff briefings	EPA Headquarters

Isabel DeLuca
Office of Air and Radiation, US EPA
(202) 343-9247

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 11/27/2018 4:50:34 PM
To: Mroz, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=64b0c7f807df436a9b40ce52f7dec34c-Mroz, Jessi]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Meeting Forward Notification: NATA briefing for Lake County Elected Officials
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM

Recurrence: (none)

Your meeting was forwarded

Fortin, Denise has forwarded your meeting request to additional recipients.

Meeting

NATA briefing for Lake County Elected Officials

Meeting Time

Wednesday, November 28, 2018 3:00 PM-4:00 PM.

Recipients

Deamer, Eileen

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Appointment

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 11/27/2018 4:29:14 PM
To: Mroz, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=64b0c7f807df436a9b40ce52f7dec34c-Mroz, Jessi]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Accepted: NATA briefing for Lake County Elected Officials
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM

Recurrence: (none)

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 11/27/2018 4:19:09 PM
To: Mroz, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=64b0c7f807df436a9b40ce52f7dec34c-Mroz, Jessi]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Meeting Forward Notification: NATA briefing for Lake County Elected Officials
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM

Recurrence: (none)

Your meeting was forwarded

Deamer, Eileen has forwarded your meeting request to additional recipients.

Meeting

NATA briefing for Lake County Elected Officials

Meeting Time

Wednesday, 28 November 2018 15:00-16:00.

Recipients

Nam, Ed

Kelley, Jeff

Siegel, Kathryn

Cain, Alexis

Fortin, Denise

Engelmann, Robert

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Appointment

From: Rimer, Kelly [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=123A21A46D0E4E53A590798CDCC3FB47-KRIMER]
Sent: 11/27/2018 4:12:23 PM
To: Mroz, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=64b0c7f807df436a9b40ce52f7dec34c-Mroz, Jessi]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Accepted: NATA briefing for Lake County Elected Officials
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM

Recurrence: (none)

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 11/27/2018 4:06:19 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: NATA briefing for Lake County Elected Officials
Attachments: Details and VTC for 11/28 meeting
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM
Show Time As: Tentative

TO: Bill Wehrum, Clint Woods, Mike Koerber, Kelly Rimer
CC: Alison Davis, Eileen Deamer

Details and VTC
for 11/28 meeting

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 11/27/2018 4:01:19 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: NATA briefing for Lake County Elected Officials
Attachments: Details and VTC for 11/28 meeting
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM
Show Time As: Tentative

TO: Bill Wehrum, Clint Woods

Details and VTC
for 11/28 meeting

Appointment

From: Grantham, Nancy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=12A3C2ED7158417FB0BB1B1B72A8CFB0-GRANTHAM, NANCY]
Sent: 11/26/2018 10:28:31 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Willowbrook Meeting Check in
Location: Personal Privacy / Ex. 6 ode Personal Privacy / Ex. 6

Start: 11/27/2018 6:00:00 PM
End: 11/27/2018 6:30:00 PM
Show Time As: Tentative

Appointment

From: Grantham, Nancy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=12A3C2ED7158417FB0BB1B1B72A8CFB0-GRANTHAM, NANCY]
Sent: 11/26/2018 9:47:32 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Willowbrook Meeting Check in
Location: Personal Privacy / Ex. 6 Code Personal Privacy / Ex. 6

Start: 11/27/2018 10:30:00 PM
End: 11/27/2018 11:00:00 PM
Show Time As: Tentative

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 11/26/2018 3:02:47 PM
To: Mroz, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=64b0c7f807df436a9b40ce52f7dec34c-Mroz, Jessi]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: Personal Privacy / Ex. 6

Start: 11/26/2018 9:30:00 PM
End: 11/26/2018 10:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 11/26/2018 3:02:41 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Call with Phil McNabb re: Sterigenics
Location: Personal Privacy / Ex. 6
Start: 11/26/2018 9:30:00 PM
End: 11/26/2018 10:00:00 PM
Show Time As: Tentative

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 11/26/2018 3:02:41 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Call with Phil McNabb re: Sterigenics
Location: Personal Privacy / Ex. 6

Start: 11/26/2018 9:30:00 PM
End: 11/26/2018 10:00:00 PM
Show Time As: Tentative

Message

Sent: 2/25/2019 3:53:18 PM
To: EtO [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1f72b2b6684348ca9321eb3595d569f9-EtO]
CC: Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Isabel DeLuca [DeLuca.Isabel@epa.gov]
Subject: FW: Calendar for Bill Wehrum, Assistant Administrator for the Office of Air and Radiation | Senior Leaders' Calendars | US EPA

Please respond to the email below from the general EtO mailbox.

For context/background: on February 5th, at the request of EPA's congressional office, Bill participated on a call with staff from the Illinois congressional delegation. This was the same day as the EPA webinar that was open to the general public, which Bill also participated in.

Regarding EtO calls and meetings more generally, Bill has accepted calls and meetings, when requested.

From: Jennifer McConahy Personal Privacy / Ex. 6 @gmail.com>
Sent: Monday, February 25, 2019 9:23 AM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Calendar for Bill Wehrum, Assistant Administrator for the Office of Air and Radiation | Senior Leaders' Calendars | US EPA

Hello-
I would like to know why Mr. Wehrum is having so many phone calls with Sterigenics. And what the EtO meeting on the hill was? As someone who is suffering from EtO pollution we sure don't have this amount of interaction from Mr. Wehrum. Curious.
Jen

Calendar for Bill Wehrum, Assistant Administrator for the Office of Air and Radiation | Senior Leaders' Calendars | US EPA

https://www.epa.gov/senior-leaders-calendars/calendar-bill-wehrum-assistant-administrator-office-air-and-radiation

Message

Sent: 10/16/2018 7:35:00 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]
Subject: FW: Stergenics - Willowbrook URGENT

I talked to a local citizen who called the main OAR line earlier today re: Willowbrook. Was in listening mode, though did commit to getting an update on the next public meeting plus any ambient air monitoring results. Since then have gotten a couple of emails like the one below (I assume she posted my name on the facebook page they have so

From: Christine Saide [**Personal Privacy / Ex. 6**]
Sent: Tuesday, October 16, 2018 2:58 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Stergenics - Willowbrook URGENT

Good Afternoon

Can we please get an update on the status of Stergenics in Willowbrook, IL, and their current standing? Last I heard there was an order to shut them down but they are still operating today 24/7 and causing harm to our community. They recently put in place 2 new trespassing signs, and security guards to walk the grounds. This shows to me that they have no intent on being shut down. What do we need to bring to the table in order for the EPA to make the decision that NO ETO is acceptable in a heavy populated area with dozens of schools, work areas, parks, and shopping centers? Is there anything that we can do as a population to further push the issue and bring them to a close? There have been 3 meetings that were all canceled for various reasons that could have brought more light to the situation and potentially a resolution to shut down. I have paperwork showing various illnesses and etc that have come to light since moving to the area.

My family spent 10 years saving up to move from Indiana to this location as it was "a nice place to live and raise a family". However, now I feel as though my family's well being is at stake. I was perfectly healthy before moving to Burr Ridge almost 2 years ago, and suddenly now am about to go undergo a mammogram for Breast Cancer Screening due to a health decline. In addition, our family pet was young and healthy but died within 1 year of being in our area from what vet's call "an extremely rare case of Lymphoma in the nose" - Vets from around the US have asked me to donate her boy and findings for further research. However, we now know in recent months that this is most likely due to the dog breathing in ETO. We spent our entire life savings to move to this area, but it's not just about the money. Even if we had millions of dollars to spend, I would still worry about those "stuck here, living here, and attending daycares/high schools in the area" due to lack of financial means.

I would like to know what I can do or what we can do further as a community to prove that no ETO should be allowed in our community. Is there another meeting scheduled in the works that we can attend to voice our opinions and hear updates? Our lives are not to be gambled or taken for granted at a time like this. Is there someone who can please let us know that someone is on our side and that things are still moving forward with shutting down Stergenics?

Thank you for your time and response,
Christine S.

Message

From: Lewis.Josh@epa.gov [Lewis.Josh@epa.gov]
Sent: 3/6/2019 10:48:27 PM
To: DeLuca, Isabel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b021c30cbee4637a7c7ca683e5e044a-IDELUCA]
Subject: Re: Webinar for EPA EtO data for Willowbrook for January 22 - February 11, 2019

Ok. Will figure this out in the am

On Mar 6, 2019, at 5:26 PM, DeLuca, Isabel <DeLuca.Isabel@epa.gov> wrote:

FYI, looks like they've scheduled the EtO webinar for 4 pm EST, so I think Bill's 4 pm may need to be rescheduled.

From: Davis, Alison
Sent: Wednesday, March 06, 2019 4:39 PM
To: DeLuca, Isabel <DeLuca.Isabel@epa.gov>
Subject: FW: Webinar for EPA EtO data for Willowbrook for January 22 - February 11, 2019

Subject: Webinar for EPA EtO data for Willowbrook for January 22 - February 11, 2019

EPA webinar: Update of EPA's Ethylene Oxide Monitoring data for Willowbrook, Illinois

The U.S. Environmental Protection Agency will hold a webinar at 3 p.m. central time, Thursday, March 7, 2019 to review air quality monitoring data for Willowbrook, Illinois, covering January 22, 2019 to February 11, 2019. For more information on this webinar, please review the details below:

Webinar:
Date: Thursday, March 7, 2019
Time: 3:00 to 4:00 p.m. (CT)
Meeting Link: https://epawebconferencing.acms.com/willowbrook

Phone line is Personal Privacy / Ex. 6
Access code

*Note: If you are at a computer, please listen through your computer speakers. We have a capacity of 500 people via computer. If you're not able to be at a computer, you'll be able to listen to the Webinar by phone. The phone line has a capacity of 125.

Materials will be posted on the website after the webinar at https://www.epa.gov/il/sterigenics-willowbrook-facility

If you have never attended an Adobe Connect meeting before, test your connection by visiting http://admin.adobeconnect.com/common/help/en/support/meeting_test.htm. *You may also get a quick overview by visiting* http://www.adobe.com/products/adobeconnect.html.

1. Click "Enter as a Guest"
2. Type in your first & last name and organization
3. Click "Enter Room"

4. You will be in the room!

Message

Sent: 11/2/2018 8:00:34 PM
Subject: Wehrum, Bill Calendar
Attachments: TEAM Briefing for Wehrum 10122018.pptx; ATT31196; ATT43097; ATT81774; ATT38235; ATT15290; ATT74475; ATT37367; ATT13619; ATT00558; ATT90691; ATT22501; ATT88608; ATT96533; ATT02771; ATT23589; ATT53867; ATT11002; ATT84589; ATT14481; ATT07378

Wehrum, Bill Calendar

November 2018

Mon, Nov 5

9:30 AM – 10:00 AM	Management Roundtable
10:00 AM – 10:30 AM	**Free**
10:30 AM – 11:00 AM	FY 18 PARS Discussion with John Shoaff
11:00 AM – 11:15 AM	**Free**
11:15 AM – 12:15 PM	Travel Efficiency Assessment Method (TEAM) state and local case study report TEAM Briefing for Wehrum 101220...
12:15 PM – 1:00 PM	**Free**
1:00 PM – 1:30 PM	One-on-one with Sarah Dunham
1:30 PM – 2:00 PM	**Free**
2:00 PM – 3:00 PM	Senior Staff Meeting
3:00 PM – 4:00 PM	Informational Briefing for Organic Liquids Distribution (OLD) Risk and Technology Review (RTR) (Tier 2, SAN 6503)
4:00 PM – 4:30 PM	Phone call with Phil Macnabb re: Sterigenics (confirmed)
4:30 PM – 5:00 PM	Fugitives follow-up
After 5:00 PM	**Free**

Message

Sent: 12/17/2018 9:44:26 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Mandy Gunasekara (Gunasekara.Mandy@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Alexander Dominguez (dominguez.alexander@epa.gov) [dominguez.alexander@epa.gov]; Shaw, Betsy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=31ca1476a7674825a131cb2c0d6c88c8-BShaw03]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]
Subject: Calendar + Materials for Tuesday
Attachments: OAR Dec 2018 Business Review Agenda.docx; OAR Dec 2019 Bowling Chart_12-13-18.xlsx; Nov 2018 Technical Assistance Activities.docx; OAP Technical Assistance.pptx; ATT48057; ATT40706; ATT06843; ATT56576; ATT92343; ATT81323; ATT00225; ATT51858; ATT87283; ATT47534; ATT41889; ATT41742; ATT62627; ATT46473; ATT38558; ATT67785; ATT51733; ATT64013; ATT65148; ATT33695; ATT93780

December 2018

Tue, Dec 18

All Day	On Leave: Mandy Gunasekara, Alex Dominguez, Sabrina Hamilton, Kati Stevens
Before 8:00 AM	**Free**
8:00 AM – 9:00 AM	**Free**
9:00 AM – 9:30 AM	Management Roundtable
9:30 AM – 10:00 AM	General Discussion
10:00 AM – 10:45 AM	ACE Update Meeting
10:45 AM – 11:00 AM	**Free**
11:00 AM – 12:00 PM	Soliciting Requests for IRIS Assessments ORD/OAR
12:00 PM – 12:15 PM	**Free**
12:15 PM – 1:00 PM	OAR Senior Staff
1:00 PM – 1:50 PM	LD GHG Bi-Weekly Updates
1:50 PM – 2:00 PM	**Free**
2:00 PM – 3:00 PM	EPA webinar: Update on Ethylene Oxide Monitoring in Willowbrook, Illinois
3:00 PM – 4:30 PM	OAR Business Review

OAP Technical Assistance.pptx | Nov 2018 Technical Assist... | OAR Dec 2019 Bowling Chart_1... | OAR Dec 2018 Business Review...

4:30 PM – 5:00 PM	**Free**
After 5:00 PM	**Free**

Message

Sent: 11/2/2018 8:12:08 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Mandy Gunasekara (Gunasekara.Mandy@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]; Dominguez, Alexander [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5ced433b4ef54171864ed98a36cb7a5f-Dominguez,]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]; Shaw, Betsy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=31ca1476a7674825a131cb2c0d6c88c8-BShaw03]
Subject: Calendar + Materials for Monday
Attachments: TEAM Briefing for Wehrum 10122018.pptx; OAR Social Media_110518.docx; web tools_110618.docx; ATT18731; ATT45285; ATT13669; ATT30477; ATT68854; ATT89926; ATT98445; ATT04269; ATT84952; ATT02024; ATT98049; ATT67106; ATT89263; ATT93871; ATT55294; ATT75747; ATT93096; ATT98782; ATT91272; ATT15105

Also, for awareness: OAR's social media for the week (standard) and two new/updated web tools that OAP and OTAQ have developed for the voluntary programs.

web tools_110618.docx

OAR Social Media_110518.d...

Wehrum, Bill Calendar

November 2018

Mon, Nov 5

9:30 AM – 10:00 AM	Management Roundtable
10:00 AM – 10:30 AM	**Free**
10:30 AM – 11:00 AM	FY 18 PARS Discussion with John Shoaff
11:00 AM – 11:15 AM	**Free**
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TEAM Briefing for Wehrum 101220...

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1:00 PM – 1:30 PM	One-on-one with Sarah Dunham
1:30 PM – 2:00 PM	**Free**
2:00 PM – 3:00 PM	Senior Staff Meeting
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4:00 PM – 4:30 PM	Phone call with Phil Macnabb re: Sterigenics (confirmed)
4:30 PM – 5:00 PM	Fugitives follow-up
After 5:00 PM	**Free**

Message

Sent: 9/27/2018 5:16:24 PM
To: Lyons, Troy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=15e4881c95044ab49c6c35a0f5eef67e-Lyons, Troy]
CC: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Konkus, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=555471b2baa6419e8e141696f4577062-Konkus, Joh]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]; Cook-Shyovitz, Becky [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=324db863c4b540d29852c65d352c8b57-Cook-Shyovitz, Becky]
Subject: 1st batch of letters
Attachments: Signed Response to Hon. Daniel Lipinski re Willowbrook -- AL-18-001-1090.pdf; Signed Response to Hon. Tammy Duckwork, Richard Durbin and Bill Foster re Willowbrook -- AL-18-001-1009.pdf; Signed Response to Hon. Peter Roskam -- OAR-18-001-1156.pdf; Signed Response to Hon. Bruce Rauner, Governor of IL re Willowbrook -- OAR-18-001-1156.pdf

Attached are letters to:
Duckworth
Durbin
Foster
Roskam
Lipinski
Governor Rauner (w/ a cc to IL EPA Director Messina)

I understand

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 27, 2018

OFFICE OF
AIR AND RADIATION

The Honorable Bruce Rauner
Governor of Illinois
Springfield, Illinois 62706

Dear Governor Rauner:

Thank you for your inquiry about ethylene oxide emissions from the Sterigenics facility in Willowbrook, Illinois. Please know that the Agency shares your concerns and is taking actions to provide certainty to the residents of Willowbrook. In the short term, the U.S. Environmental Protection Agency's (EPA) national Office of Air and Radiation will be collecting, analyzing, and communicating technical information, including recent stack testing results, risk and exposure modeling, and ambient monitoring, to provide updated, comprehensive information to the public. It is important to note that the air concentrations of ethylene oxide are not high enough to cause immediate harm to health for the people in and around Willowbrook.

We are working with state and local air agencies and other EPA offices to take steps to address emissions of ethylene oxide, and are committed to continuing to provide information to the public throughout this process. Initial information, including links to information for the Willowbrook facility, is available on our ethylene oxide website at: https://www.epa.gov/hazardous-air-pollutants-ethylene-oxide.

Willowbrook is one of a number of areas that the recently updated National Air Toxics Assessment (NATA) identifies as potentially having an elevated chronic risk from ethylene oxide. NATA is a screening tool to identify areas of the country, pollutants or types of pollution sources that may need to be examined further to better understand risks to public health. Ethylene oxide is used to sterilize equipment and plastic devices that cannot be sterilized by steam, such as medical equipment. The elevated risks from ethylene oxide in the 2014 NATA are driven largely by a toxicity value from the Agency's 2016 IRIS assessment, which estimated that ethylene oxide is 50 to 60 times more potent than previous estimates. This value is used along with the information about air concentrations (exposure), to determine potential risk of cancer that may occur to someone who is continuously exposed to a specific chemical for 24 hours per day over 70 years.

Over the last several months, EPA has provided ethylene oxide-related information from NATA and additional technical work to the community in and around Willowbrook. We know that this information has raised a number of questions and the Agency is working to develop additional technical and communication materials to help the community understand the potential risks.

Based on preliminary NATA results earlier this year, EPA Region 5 contacted Sterigenics about its emissions. The company quickly and voluntarily took steps to reduce emissions using pollution control equipment. The pollution control improvements were completed on July 27, 2018. Sterigenics had estimated that the control equipment would reduce ethylene oxide emissions by over 90 percent. After the pollution controls began operating, a contractor hired by Sterigenics conducted stack testing of ethylene oxide emissions at the facility on September 20 and 21, 2018. U.S. EPA subject matter experts as well as experts from the Illinois EPA were on site to ensure that the tests followed EPA-approved protocols and would provide the right type of information to inform the community about resulting changes in emissions and concentrations of ethylene oxide. This testing will give the Agency the information it needs to provide the most accurate picture of the potential risks to the community, and actions the Agency may need to take.

We expect to receive the results of the testing in the next few days. Early indications from the post-control stack testing suggest that emissions have indeed been significantly reduced. Our experts will work with our colleagues at the Illinois EPA to review the test data as soon as we receive it to quality assure the results and make them available to the public as expeditiously as possible. EPA will use the quality-assured data from the stack tests to conduct additional technical assessments that will help us estimate potential risk for the community. U.S. EPA will work closely with Illinois EPA and Sterigenics as we conduct these assessments.

We have received a number of requests to conduct outdoor air quality monitoring of ethylene oxide in Willowbrook. While there are limitations to the ability of currently available monitoring instruments and techniques to measure ethylene oxide at all levels that may present a long-term public health risk, EPA also intends to supplement this technical work with appropriate ambient monitoring in the near future. It is important to note that data from emissions testing at the stack provides the most accurate information to assist us in determining potential risk.

EPA is also working to further investigate emissions at the other areas NATA indicated may be at higher risk due to ethylene oxide exposure. We will work with state and local agencies and across EPA offices on a two-pronged approach to address ethylene oxide emissions:

1. The Agency has already started to review and update Clean Air Act regulations for facilities that emit ethylene oxide. This work includes standards applicable to chemical plants that use ethylene oxide and, more importantly for Willowbrook, standards for sterilizers that use ethylene oxide.

2. We are gathering additional information on industrial emissions of ethylene oxide from particular facilities, including the Willowbrook facility. This information will help EPA as it evaluates opportunities to reduce ethylene oxide emissions as part of its regulations review. It also will help the Agency determine whether more immediate emission reduction steps are necessary in any particular locations.

Additional information on our work to address ethylene oxide is available at: https://www.epa.gov/hazardous-air-pollutants-ethylene-oxide. The 2014 NATA results are available at: https://www.epa.gov/national-air-toxics-assessment/2014-nata-assessment-results.

EPA will continue to coordinate closely with state and local air agencies, and across EPA offices, as we continue to work to address ethylene oxide and protect public health across the U.S. Please do not hesitate to contact me or Troy Lyons in the Office of Congressional and Intergovernmental Relations at lyons.troy@epa.gov or 202-564-5200 if you wish to discuss this issue further.

Sincerely,

William L. Wehrum
Assistant Administrator

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 27, 2018

OFFICE OF
AIR AND RADIATION

The Honorable Daniel Lipinski
U.S. House of Representatives
Washington, D.C. 20515

Dear Congressman Lipinski:

Thank you for your letter of September 21, 2018, about ethylene oxide emissions from the Sterigenics facility in Willowbrook, Illinois. Please know that the Agency shares your concerns and is taking actions to provide certainty to the residents of Willowbrook. In the short term, the U.S. Environmental Protection Agency's (EPA) national Office of Air and Radiation will be collecting, analyzing, and communicating technical information, including recent stack testing results, risk and exposure modeling, and ambient monitoring, to provide updated, comprehensive information to the public. It is important to note that the air concentrations of ethylene oxide are not high enough to cause immediate harm to health for the people in and around Willowbrook.

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EPA will continue to coordinate closely with state and local air agencies, and across EPA offices, as we continue to work to address ethylene oxide and protect public health across the U.S. Please do not hesitate to contact me or Troy Lyons in the Office of Congressional and Intergovernmental Relations at lyons.troy@epa.gov or 202-564-5200 if you wish to discuss this issue further.

Sincerely,

William L. Wehrum
Assistant Administrator

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 27, 2018

OFFICE OF
AIR AND RADIATION

The Honorable Peter Roskam
U.S. House of Representatives
Washington, D.C. 20515

Dear Congressman Roskam:

Thank you for your inquiry about ethylene oxide emissions from the Sterigenics facility in Willowbrook, Illinois. Please know that the Agency shares your concerns and is taking actions to provide certainty to the residents of Willowbrook. In the short term, the U.S. Environmental Protection Agency's (EPA) national Office of Air and Radiation will be collecting, analyzing, and communicating technical information, including recent stack testing results, risk and exposure modeling, and ambient monitoring, to provide updated, comprehensive information to the public. It is important to note that the air concentrations of ethylene oxide are not high enough to cause immediate harm to health for the people in and around Willowbrook.

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EPA will continue to coordinate closely with state and local air agencies, and across EPA offices, as we continue to work to address ethylene oxide and protect public health across the U.S. Please do not hesitate to contact me or Troy Lyons in the Office of Congressional and Intergovernmental Relations at lyons.troy@epa.gov or 202-564-5200 if you wish to discuss this issue further.

Sincerely,

William L. Wehrum
Assistant Administrator

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 27, 2018

OFFICE OF
AIR AND RADIATION

The Honorable Tammy Duckworth
United States Senate
Washington, D.C. 20510

Dear Senator Duckworth:

Thank you for your letter of September 21, 2018, about ethylene oxide emissions from the Sterigenics facility in Willowbrook, Illinois. Please know that the Agency shares your concerns and is taking actions to provide certainty to the residents of Willowbrook. In the short term, the U.S. Environmental Protection Agency's (EPA) national Office of Air and Radiation will be collecting, analyzing, and communicating technical information, including recent stack testing results, risk and exposure modeling, and ambient monitoring, to provide updated, comprehensive information to the public. It is important to note that the air concentrations of ethylene oxide are not high enough to cause immediate harm to health for the people in and around Willowbrook.

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Sincerely,

William L. Wehrum
Assistant Administrator

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 27, 2018

OFFICE OF
AIR AND RADIATION

The Honorable Richard Durbin
United States Senate
Washington, D.C. 20510

Dear Senator Durbin:

Thank you for your letter of September 21, 2018, about ethylene oxide emissions from the Sterigenics facility in Willowbrook, Illinois. Please know that the Agency shares your concerns and is taking actions to provide certainty to the residents of Willowbrook. In the short term, the U.S. Environmental Protection Agency's (EPA) national Office of Air and Radiation will be collecting, analyzing, and communicating technical information, including recent stack testing results, risk and exposure modeling, and ambient monitoring, to provide updated, comprehensive information to the public. It is important to note that the air concentrations of ethylene oxide are not high enough to cause immediate harm to health for the people in and around Willowbrook.

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Sincerely,

William L. Wehrum
Assistant Administrator

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 27, 2018

OFFICE OF
AIR AND RADIATION

The Honorable Bill Foster
U.S. House of Representatives
Washington, D.C. 20515

Dear Congressman Foster:

Thank you for your letter of September 21, 2018, about ethylene oxide emissions from the Sterigenics facility in Willowbrook, Illinois. Please know that the Agency shares your concerns and is taking actions to provide certainty to the residents of Willowbrook. In the short term, the U.S. Environmental Protection Agency's (EPA) national Office of Air and Radiation will be collecting, analyzing, and communicating technical information, including recent stack testing results, risk and exposure modeling, and ambient monitoring, to provide updated, comprehensive information to the public. It is important to note that the air concentrations of ethylene oxide are not high enough to cause immediate harm to health for the people in and around Willowbrook.

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Sincerely,

William L. Wehrum
Assistant Administrator

Appointment

From: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Sent: 12/4/2018 2:25:29 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]

Subject: willowbrook

Start: 12/4/2018 8:30:00 PM
End: 12/4/2018 9:00:00 PM
Show Time As: Busy

Appointment

From: Perez, Idalia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=03b7a08fdfbe4934911f17550d78491d-IPEREZ]
Sent: 9/26/2018 4:43:16 PM
To: Perez, Idalia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=03b7a08fdfbe4934911f17550d78491d-IPEREZ]; Air Division Directors and Deputies [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1b532f2f8468410ca085dc3d6c7d2e4d-Air Division Directors and Deputies]; Air Division Directors Call List [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cb9b2644cf834fd2acdb0bcc1d46d524-Air Division Directors Call List]

Subject: Larger ADD Call (FY2019, every 4 weeks)
Attachments: Untitled Attachment; Canceled: Larger ADD Call (FY2019, every 4 weeks) ; Untitled Attachment; Untitled Attachment
Location: Conf. Line: Personal Phone / Ex. 6

Start: 11/5/2018 9:00:00 PM
End: 11/5/2018 10:00:00 PM
Show Time As: Tentative

Recurrence: Weekly
Occurs on Monday every 4 weeks from 1:00 PM to 2:00 PM effective 11/5/2018 until 10/28/2019.

Update: Adding call-in information.
New recurring invite for larger ADD call. Agenda and materials will be posted prior to the call.

Please accept this invite to add it to your calendar.

Idalia M. Pérez, Ph.D. | OAR Lead Region Coordinator
U.S. Environmental Protection Agency – Region 9
75 Hawthorne St. (AIR-1), San Francisco, CA 94105
P: 415.972.3248 | email: perez.idalia@epa.gov
OAR Lead Region SharePoint Site

Appointment

To: Perez, Idalia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=03b7a08fdfbe4934911f17550d78491d-IPEREZ]; Air Division Directors and Deputies [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1b532f2f8468410ca085dc3d6c7d2e4d-Air Division Directors and Deputies]; Air Division Directors Call List [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cb9b2644cf834fd2acdb0bcc1d46d524-Air Division Directors Call List]; Sargeant, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2d883d76f4f5401ea938362b26b582c9-Sargeant, Kathryn]; Bunte, Laura [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0f54ad75f1fa4eda87e33676d962aeff-lbunte]; Elleman, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5b657921772441f1be01bd42becaef90-Elleman, Rob]; Hyde, Courtney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b9817dab77e44c898a7a7fb8b82ce353-CHYDE]; Mroz, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=64b0c7f807df436a9b40ce52f7dec34c-Mroz, Jessi]; Herbolsheimer, Courtney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=90b4261f62504cfb88f57a669c8217d3-Herbolsheim]; Dunkins, Robin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=50505af25af94494ad34ee072a4f1e45-RDUNKINS]; Weinstock, Lewis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=df30e068efb24a24b35d63be0596ad9b-LWEINS02]

CC: Veal, Lee [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=eb5e1fde4d7041539934f58976a20fc2-Veal, Lee]; Judge, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b2048f01fef64c0c8d4774a2012c7765-Judge, Robert]; Murray, Beth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9cdfbf7827e146e298aa9d7533e4e94e-Murray, Beth]; Lifland, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ae66f3f6f2f49448557644bfc05a75c-Lifland, David]; Jackson, Scott [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ae993f489cbb4048a91433a63933c4d5-SJACKS07]; Fiedler, Kerri [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d98346b4d0ad4ccb87c77cef03365b42-Fiedler, Kerri]; Daly, Carl [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ad9eb9a4ae3a427ba3a1907142ad3e0c-Daly, Carl]

Location: Conf. Line: Personal Privacy / Ex. 6 Conference ID: Personal Privacy / Ex. 6

Start: 2/25/2019 9:00:00 PM
End: 2/25/2019 10:00:00 PM
Show Time As: Tentative

Recurrence: (none)
every 4 week(s) on Monday from 1:00 PM to 2:00 PM

Update: Adding agenda.

Biweekly Air Division Directors Conference Call

Conference Line:
Conference ID: Personal Privacy / Ex. 6

Date: Monday, February 25th, 2019
Time: 4:00 Eastern Time

Agenda

Deliberative Process / Ex. 5

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 3/12/2019 7:50:13 PM
To: Eby, Natasha [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d5c14481f6874e3aa434b3b01a4a2a7d-Eby, Natash]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Dominguez, Alexander [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5ced433b4ef54171864ed98a36cb7a5f-Dominguez,]; Humphreys, Hayly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4f4a7b4aeaf143bf806b0dd5b7884324-Humphreys,]
Subject: Re: Background materials for Stop Sterigenics meeting (Wednesday morning at 9:30

Sorry for delay - Just sent POET

On Mar 12, 2019, at 3:40 PM, Eby, Natasha <eby.natasha@epa.gov> wrote:

> Hi,
>
> Have you gotten an update re: POET? And Clint, does AW need anything before tomorrow's CAFE meeting?
>
> Thanks everyone!
>
> ---
>
> **From:** Lewis, Josh
> **Sent:** Tuesday, March 12, 2019 11:27 AM
> **To:** Eby, Natasha <eby.natasha@epa.gov>
> **Cc:** Woods, Clint <woods.clint@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; Humphreys, Hayly <humphreys.hayly@epa.gov>
> **Subject:** RE: Background materials for Stop Sterigenics meeting (Wednesday morning at 9:30
>
> Checking now on POET. Not sure about WH CAFE meeting. Clint may know.
>
> ---
>
> **From:** Eby, Natasha
> **Sent:** Tuesday, March 12, 2019 11:25 AM
> **To:** Lewis, Josh <Lewis.Josh@epa.gov>
> **Cc:** Woods, Clint <woods.clint@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; Humphreys, Hayly <humphreys.hayly@epa.gov>
> **Subject:** RE: Background materials for Stop Sterigenics meeting (Wednesday morning at 9:30
>
> Thank you Josh!
>
> Is OAR also providing briefing materials on the POET meeting as well? And, do you think he'll need additional materials for his meeting tomorrow at the White House re: CAFE?
>
> Thank you so much!
> Natasha

From: Lewis, Josh
Sent: Tuesday, March 12, 2019 11:22 AM
To: Eby, Natasha <eby.natasha@epa.gov>; Humphreys, Hayly <humphreys.hayly@epa.gov>
Cc: Woods, Clint <woods.clint@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>
Subject: Background materials for Stop Sterigenics meeting (Wednesday morning at 9:30

Background paper + copy of recent press release from Stop Sterigenics.

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 3/12/2019 4:08:16 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: General Discussion re: Lake County
Location: WJC-N 5406 + Video to RTP

Start: 3/12/2019 6:30:00 PM
End: 3/12/2019 7:00:00 PM
Show Time As: Tentative

Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 3/12/2019 2:42:07 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Just heard from Mike. We'll circle up with R5 to find out whether there is any additional info they didn't add to yesterday's pager. Thanks!

From: Lewis, Josh
Sent: Tuesday, March 12, 2019 10:16 AM
To: Weinstock, Lewis <Weinstock.Lewis@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Deliberative Process / Ex. 5

From: Weinstock, Lewis
Sent: Tuesday, March 12, 2019 9:56 AM
To: Davis, Alison <Davis.Alison@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

2 pm is ok for me.

Lewis Weinstock | Office of Air Quality Planning & Standards | U.S. Environmental Protection Agency | Research Triangle Park, NC 27711 | Phone: 919-541-3661|

From: Davis, Alison
Sent: Tuesday, March 12, 2019 9:54 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Josh –
I'm available if others are.

Deliberative Process / Ex. 5

From: Lewis, Josh
Sent: Tuesday, March 12, 2019 9:45 AM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>

Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Are you able to meet w/ Bill later today? He's looking at 2 pm. Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Josh Lewis
Chief of Staff
EPA/Office of Air and Radiation
Office: 202 564 2095

Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 3/12/2019 2:21:01 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

I think Mike is up there until Thursday (at SES training). Leaving you a vmail on the other part.

From: Lewis, Josh
Sent: Tuesday, March 12, 2019 10:16 AM
To: Weinstock, Lewis <Weinstock.Lewis@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Ok thanks. We'll limit it to lake County…and you can note the upcoming meeting w. the regions on the other sites. I think Mike may be on a plane this afternoon so not sure he's available…but Bill needs the meeting before the call w/ Durbin at 4:30. So if there are others you want on the invite let us know. (Though trying to keep it on the small side).

From: Weinstock, Lewis
Sent: Tuesday, March 12, 2019 9:56 AM
To: Davis, Alison <Davis.Alison@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

2 pm is ok for me.

Lewis Weinstock | Office of Air Quality Planning & Standards | U.S. Environmental Protection Agency | Research Triangle Park, NC 27711 | Phone: 919-541-3661|

From: Davis, Alison
Sent: Tuesday, March 12, 2019 9:54 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Josh –
I'm available if others are.

Deliberative Process / Ex. 5

From: Lewis, Josh
Sent: Tuesday, March 12, 2019 9:45 AM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>

Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Are you able to meet w/ Bill later today?

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Josh Lewis
Chief of Staff
EPA/Office of Air and Radiation
Office: 202 564 2095

Message

From: Stachowiak, Robert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2710013BD33A44AB823C8E6D9B94275A-RSTACHOW]
Sent: 3/11/2019 11:17:34 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: ISO TPs for GC

Thanks!

Robert Stachowiak
U.S. Environmental Protection Agency
Acting Associate Deputy General Counsel
Office of General Counsel (2310A)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460
(202) 564-0580

From: Woods, Clint
Sent: Monday, March 11, 2019 7:03 PM
To: Stachowiak, Robert <Stachowiak.Robert@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: ISO TPs for GC

Ethylene Oxide material below

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

From: Stachowiak, Robert
Sent: Monday, March 11, 2019 5:38 PM
To: Woods, Clint <woods.clint@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: ISO TPs for GC

Hi Clint –

Matt is doing an event in New Orleans on Friday morning, and was hoping to get some talking points/QAs on (1) ethylene chloride; and (2) the Denke facility in Louisiana, should he get a question from the audience on either topic. Does OAR have anything on these?

Thanks,
Rob S.

Robert Stachowiak
U.S. Environmental Protection Agency
Acting Associate Deputy General Counsel
Office of General Counsel (2310A)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460
(202) 564-0580

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 3/11/2019 7:28:44 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + **Personal Privacy / Ex. 6**

Start: 3/11/2019 8:15:00 PM
End: 3/11/2019 8:45:00 PM
Show Time As: Tentative

Recurrence: Weekly
every Monday from 4:00 PM to 4:30 PM

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 3/11/2019 7:28:44 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + Personal Privacy / Ex. 6

Start: 3/11/2019 8:15:00 PM
End: 3/11/2019 8:45:00 PM
Show Time As: Tentative

Recurrence: Weekly
every Monday from 4:00 PM to 4:30 PM

Message

From: Noonan, Jenny [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=19D41FF0E3054AAFA47D3C33308E5B30-JNOONAN]
Sent: 3/11/2019 6:03:36 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Ashley, Jackie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=01a9a3cadfa14c509d09cdae3498dd43-JASHLEY]; Long, Pam [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f32548c120b14bd2af1d2c2a12bf641c-PLONG]
Subject: RE: Draft EtO Response 3-6-19.docx

Sounds good.

From: Lewis, Josh
Sent: Monday, March 11, 2019 1:41 PM
To: Noonan, Jenny <Noonan.Jenny@epa.gov>
Cc: Davis, Alison <Davis.Alison@epa.gov>; Ashley, Jackie <Ashley.Jackie@epa.gov>; Long, Pam <Long.Pam@epa.gov>
Subject: RE: Draft EtO Response 3-6-19.docx

Deliberative Process / Ex. 5

From: Noonan, Jenny
Sent: Wednesday, March 06, 2019 8:04 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Cc: Davis, Alison <Davis.Alison@epa.gov>; Ashley, Jackie <Ashley.Jackie@epa.gov>; Long, Pam <Long.Pam@epa.gov>
Subject: Draft EtO Response 3-6-19.docx

Deliberative Process / Ex. 5

Message

From: Lewis, Josh [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22D1D3BB3F84436A524F76AB6C79D7E-JOLEWIS]
Sent: 3/11/2019 3:44:26 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: Send mike K's name for stop sterigenics

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 3/11/2019 2:04:47 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + Personal Privacy / Ex. 6
Start: 3/11/2019 8:00:00 PM
End: 3/11/2019 8:30:00 PM
Show Time As: Tentative

Recurrence: Weekly
every Monday from 4:00 PM to 4:30 PM

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 3/11/2019 2:04:47 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 Personal Privacy / Ex. 6

Start: 3/11/2019 8:00:00 PM
End: 3/11/2019 8:30:00 PM
Show Time As: Tentative

Recurrence: Weekly
every Monday from 4:00 PM to 4:30 PM

Message

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 3/7/2019 9:58:50 PM
To: DeLuca, Isabel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b021c30cbee4637a7c7ca683e5e044a-IDELUCA]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: Bill's calendar

Looks good to me!

From: DeLuca, Isabel
Sent: Thursday, March 7, 2019 4:38 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: Re: Bill's calendar

Thanks!

On Mar 7, 2019, at 4:35 PM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:

Deliberative Process / Ex. 5

From: DeLuca, Isabel
Sent: Thursday, March 07, 2019 4:03 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Bill's calendar

Hi Josh,
Here's Bill's calendar – I have a few questions below on 2/21, 2/25, and 3/1. Please let me know what you think and if you see anything that's wrong!

Many thanks,
Isabel

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Isabel DeLuca
Office of Air and Radiation, US EPA
(202) 343-9247

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 3/7/2019 9:03:39 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: DeLuca, Isabel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b021c30cbee4637a7c7ca683e5e044a-IDELUCA]
Subject: Re: Webinar for EPA EtO data for Willowbrook for January 22 - February 11, 2019

Thanks!

On Mar 7, 2019, at 3:28 PM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:

Clint – Delaney will open the line in the main conference room

From: DeLuca, Isabel
Sent: Thursday, March 07, 2019 2:40 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>; Woods, Clint <woods.clint@epa.gov>
Subject: FW: Webinar for EPA EtO data for Willowbrook for January 22 - February 11, 2019

FYI, info for today's webinar is below. I plan to be in listen mode via the phone option.

From: Davis, Alison
Sent: Wednesday, March 06, 2019 4:39 PM
To: DeLuca, Isabel <DeLuca.Isabel@epa.gov>
Subject: FW: Webinar for EPA EtO data for Willowbrook for January 22 - February 11, 2019

Subject: Webinar for EPA EtO data for Willowbrook for January 22 - February 11, 2019

EPA webinar: Update of EPA's Ethylene Oxide Monitoring data for Willowbrook, Illinois

The U.S. Environmental Protection Agency will hold a webinar at 3 p.m. central time, Thursday, March 7, 2019 to review air quality monitoring data for Willowbrook, Illinois, covering January 22, 2019 to February 11, 2019. For more information on this webinar, please review the details below:

Webinar:
Date: Thursday, March 7, 2019
Time: 3:00 to 4:00 p.m. (CT)
Meeting Link: https://epawebconferencing.acms.com/willowbrook

Phone line is Personal Privacy / Ex. 6
Access code i

*Note: If you are at a computer, please listen through your computer speakers. We have a capacity of 500 people via computer. If you're not able to be at a computer, you'll be able to listen to the Webinar by phone. The phone line has a capacity of 125.

Materials will be posted on the website after the webinar at https://www.epa.gov/il/sterigenics-willowbrook-facility

If you have never attended an Adobe Connect meeting before, test your connection by visiting http://admin.adobeconnect.com/common/help/en/support/meeting_test.htm. *You may also get a quick overview by visiting* http://www.adobe.com/products/adobeconnect.html.

1. Click "Enter as a Guest"
2. Type in your first & last name and organization
3. Click "Enter Room"
4. You will be in the room!

Appointment

From: Davis, Matthew [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=84111EC08C504B6BAAE0510B2D2CE46A-DAVIS, MATTHEW]
Sent: 3/6/2019 8:18:07 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Congressional staff heads up call on most recent EtO Willowbrook data
Location: North room 3428; Call-in: Personal Privacy / Ex. 6

Start: 3/7/2019 5:00:00 PM
End: 3/7/2019 5:30:00 PM
Show Time As: Tentative

Message

Sent: 3/5/2019 8:24:05 PM
Subject: FW: Draft products for Willowbrook web posting
Attachments: 022619 v1 Willowbrook EtO Master Data Table for Web.xlsx; Willowbrook EtO working slides Jan 22 thru Feb 11.pptx; March 2019_2.JPG; OAR Social Media_030519.docx

Social media posts for awareness:

OAR Social Media_030519.d...

March 2019_2.JPG

Here is the next set of data to be posted (Jan 22 thru Feb 11).

022619 v1 Willowbrook EtO ...

Willowbrook EtO working slides Ja...

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 2/25/2019 8:56:11 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + 2 Personal Privacy / Ex. 6

Start: 2/25/2019 9:00:00 PM
End: 2/25/2019 9:30:00 PM
Show Time As: Tentative

Recurrence: Weekly
every Monday from 4:00 PM to 4:30 PM

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 2/25/2019 8:56:11 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + **Personal Privacy / Ex. 6**

Start: 2/25/2019 9:00:00 PM
End: 2/25/2019 9:30:00 PM
Show Time As: Tentative

Recurrence: Weekly
every Monday from 4:00 PM to 4:30 PM

Appointment

From: Perez, Idalia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=03B7A08FDFBE4934911F17550D78491D-IPEREZ]
Sent: 2/25/2019 7:51:05 PM
To: Air Division Directors and Deputies [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1b532f2f8468410ca085dc3d6c7d2e4d-Air Division Directors and Deputies]; Air Division Directors Call List [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cb9b2644cf834fd2acdb0bcc1d46d524-Air Division Directors Call List]; Sargeant, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2d883d76f4f5401ea938362b26b582c9-Sargeant, Kathryn]; Bunte, Laura [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0f54ad75f1fa4eda87e33676d962aeff-lbunte]; Elleman, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5b657921772441f1be01bd42becaef90-Elleman, Rob]; Hyde, Courtney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b9817dab77e44c898a7a7fb8b82ce353-CHYDE]; Mroz, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=64b0c7f807df436a9b40ce52f7dec34c-Mroz, Jessi]; Herbolsheimer, Courtney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=90b4261f62504cfb88f57a669c8217d3-Herbolsheim]; Dunkins, Robin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=50505af25af94494ad34ee072a4f1e45-RDUNKINS]; Weinstock, Lewis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=df30e068efb24a24b35d63be0596ad9b-LWEINS02]
CC: Veal, Lee [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=eb5e1fde4d7041539934f58976a20fc2-Veal, Lee]; Judge, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b2048f01fef64c0c8d4774a2012c7765-Judge, Robert]; Murray, Beth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9cdfbf7827e146e298aa9d7533e4e94e-Murray, Beth]; Lifland, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ae66f3f6f2f49448557644bfc05a75c-Lifland, David]; Jackson, Scott [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ae993f489cbb4048a91433a63933c4d5-SJACKS07]; Fiedler, Kerri [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d98346b4d0ad4ccb87c77cef03365b42-Fiedler, Kerri]; Daly, Carl [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ad9eb9a4ae3a427ba3a1907142ad3e0c-Daly, Carl]

Subject: Larger ADD Call (FY2019, every 4 weeks)
Location: Conf. Line: Personal Privacy / Ex. 6 onference ID: Personal Privacy / Ex. 6

Start: 2/25/2019 9:00:00 PM
End: 2/25/2019 10:00:00 PM
Show Time As: Tentative

Recurrence: Weekly
every 4 week(s) on Monday from 1:00 PM to 2:00 PM

Update: Adding agenda.

Biweekly Air Division Directors Conference Call

Conference Line:
Conference ID: Personal Privacy / Ex. 6

Date: Monday, February 25th, 2019
Time: 4:00 Eastern Time

Deliberative Process / Ex. 5

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 2/22/2019 4:37:44 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Call with Region 5 re: Sterigenics
Attachments: Re: Sterigenics - foundational support for USEPA's sampling data
Location: WJC - N + Personal Privacy / Ex. 6

Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM
Show Time As: Tentative

TO: Bill Wehrum, Clint Woods, Justin Schwab, Cheryl Newton, Kurt Thiede, Levertt Nelson, Ed Nam, Joe Brazaskas, Mike Koerber, David Harlow

Re: Sterigenics - foundational sup...

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 2/22/2019 4:37:44 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Call with Region 5 re: Sterigenics
Attachments: Re: Sterigenics - foundational support for USEPA's sampling data
Location: WJC - N + Personal Privacy / Ex. 6

Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM
Show Time As: Tentative

TO: Bill Wehrum, Clint Woods, Justin Schwab, Cheryl Newton, Kurt Thiede, Levertt Nelson, Ed Nam, Joe Brazaskas, Mike Koerber, David Harlow

Re: Sterigenics - foundational sup...

Appointment

From: Perez, Idalia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=03B7A08FDFBE4934911F17550D78491D-IPEREZ]
Sent: 2/25/2019 3:21:44 PM
To: Air Division Directors and Deputies [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1b532f2f8468410ca085dc3d6c7d2e4d-Air Division Directors and Deputies]; Air Division Directors Call List [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cb9b2644cf834fd2acdb0bcc1d46d524-Air Division Directors Call List]; Sargeant, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2d883d76f4f5401ea938362b26b582c9-Sargeant, Kathryn]; Bunte, Laura [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0f54ad75f1fa4eda87e33676d962aeff-lbunte]; Elleman, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5b657921772441f1be01bd42becaef90-Elleman, Rob]; Hyde, Courtney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b9817dab77e44c898a7a7fb8b82ce353-CHYDE]; Mroz, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=64b0c7f807df436a9b40ce52f7dec34c-Mroz, Jessi]; Herbolsheimer, Courtney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=90b4261f62504cfb88f57a669c8217d3-Herbolsheim]; Dunkins, Robin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=50505af25af94494ad34ee072a4f1e45-RDUNKINS]; Weinstock, Lewis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=df30e068efb24a24b35d63be0596ad9b-LWEINS02]
CC: Veal, Lee [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=eb5e1fde4d7041539934f58976a20fc2-Veal, Lee]; Judge, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b2048f01fef64c0c8d4774a2012c7765-Judge, Robert]; Murray, Beth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9cdfbf7827e146e298aa9d7533e4e94e-Murray, Beth]

Subject: Larger ADD Call (FY2019, every 4 weeks)
Location: Conf. Line: Personal Privacy / Ex. 6 Conference ID: Personal Privacy / Ex. 6

Start: 2/25/2019 9:00:00 PM
End: 2/25/2019 10:00:00 PM
Show Time As: Tentative

Recurrence: Weekly
every 4 week(s) on Monday from 1:00 PM to 2:00 PM

Update: Adding agenda.

Biweekly Air Division Directors Conference Call

Conference Line: Personal Privacy / Ex. 6
Conference ID:

Date: Monday, February 25th, 2019
Time: 4:00 Eastern Time

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Appointment

From: Lewis, Josh [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22D1D3BB3F84436A524F76AB6C79D7E-JOLEWIS]
Sent: 2/21/2019 6:37:42 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: EPA Webinar: Update on Ethylene Oxide Monitoring in Willowbrook, Illinois
Location: WJC-N 5400

Start: 2/21/2019 7:00:00 PM
End: 2/21/2019 8:00:00 PM
Show Time As: Tentative

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 2/19/2019 5:59:13 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + Personal Privacy / Ex. 6

Start: 2/19/2019 6:00:00 PM
End: 2/19/2019 6:30:00 PM
Show Time As: Tentative

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 2/19/2019 5:59:13 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + Personal Privacy / Ex. 6

Start: 2/19/2019 6:00:00 PM
End: 2/19/2019 6:30:00 PM
Show Time As: Tentative

Message

From: Hamilton, Sabrina [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=68D3167C798743848AAFCDFB73BB74F1-SHAMILTN]
Sent: 2/21/2019 3:20:14 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: Cyran, Carissa [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8a903847a9424979b89400688b5c2f5e-Cyran, Carissa]; Carroll, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4e868254d9da47e1ab5831814a7ff2fb-Carroll, Ma]
Subject: RE: Correspondence

Great. Thanks

Sabrina Hamilton

Sabrina Hamilton
Air and Radiation Liaison Specialist
and FOIA Coordinator
Office of Air and Radiation
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Avenue, N.W. (6101-A)
Washington, D.C. 20460
Tel: (202) 564-1083

From: Lewis, Josh
Sent: Thursday, February 21, 2019 10:12 AM
To: Hamilton, Sabrina <Hamilton.Sabrina@epa.gov>
Cc: Cyran, Carissa <Cyran.Carissa@epa.gov>; Carroll, Maria <carroll.maria@epa.gov>
Subject: RE: Correspondence

I have 4 AX- controls. I'll get them to Bill tonight for his review (tho one may have to go to Clint first)
-1944
-1941
-2310
-1605

Clint has 1 or 2 Willowbrook letters. I don't have the #'s handy.

I think that's it

From: Hamilton, Sabrina
Sent: Thursday, February 21, 2019 9:13 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Cc: Cyran, Carissa <Cyran.Carissa@epa.gov>; Carroll, Maria <carroll.maria@epa.gov>
Subject: Correspondence

Josh,

Please let me know what correspondence you or other senior managers may have for review in the IO. Thanks

Sabrina Hamilton

Sabrina Hamilton
Air and Radiation Liaison Specialist
and FOIA Coordinator
Office of Air and Radiation
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Avenue, N.W. (6101-A)
Washington, D.C. 20460
Tel: (202) 564-1083

Appointment

From: Rodrick, Christian [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6515DBE46DAE466DA53C8A3AA3BE8CC2-RODRICK, CH]
Sent: 2/20/2019 10:27:14 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Willowbrook Congressional Pre-call
Location: Call in: Personal Privacy / Ex. 6 Conference ID: Personal Privacy / Ex. 6 --CRodrick to open call in line

Start: 2/21/2019 2:45:00 PM
End: 2/21/2019 3:15:00 PM
Show Time As: Tentative

All,

In advance of new Willowbrook monitoring data being posted on EPA's website tomorrow afternoon, (w/ a public webinar at 2:00PM to follow) we wanted to offer a pre-call to Congressional staff tomorrow at 9:45AM to give you a heads up on what you can expect. Please let me know if you think you will be able to join the call and I look forward to hearing from you. Call in information is below:

Call in Personal Privacy / Ex. 6
Conference ID Personal Privacy / Ex. 6

If you have any questions, please do not hesitate to let me know,

Christian Rodrick
Congressional and Intergovernmental Relations
U.S. Environmental Protection Agency
O: (202) 564-4828
C: (202) 578-2755
E: Rodrick.Christian@epa.gov

Message

Sent: 3/8/2019 5:27:38 PM
To: DeLuca, Isabel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b021c30cbee4637a7c7ca683e5e044a-IDELUCA]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]
CC: Millett, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c067caa6c93544f78c26ab08cc567d27-Millett, John]
Subject: RE: Bill's calendar 2/18-3/1

+Clint and Delaney.

From: DeLuca, Isabel
Sent: Friday, March 08, 2019 9:25 AM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>; Harlow, David <harlow.david@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>; Millett, John <Millett.John@epa.gov>
Subject: Bill's calendar 2/18-3/1

Hi all,
Below is Bill's calendar from 2/18-3/1. Please let me know if you have any corrections or questions before I send to OPA for posting.

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Isabel DeLuca
Office of Air and Radiation, US EPA
(202) 343-9247

Message

Sent: 2/22/2019 9:22:32 PM
Subject: Calendar + Materials for Monday
Attachments: 2019 ES Awards Recommendations AA 2-20-19-v2.docx; 2019 ENERGY STAR Awards Briefing for BWehrum v10.pptx; DERA eligibility TPs Wehrum Stoker 2_15_2019 TCD.DOCX; MSW RTR OS 2.25.19v2 rev.docx; ATT00687; ATT28774; ATT36359; ATT66268; ATT44540; ATT54768; ATT99924; ATT09639; ATT45386; ATT81455; ATT67595; ATT96581; ATT35984; ATT31823; ATT90776; ATT20684; ATT04836; ATT70009; ATT43852

February 2019

Mon, Feb 25

Before 8:00 AM	**Free**
8:00 AM – 9:30 AM	**Free**
9:30 AM – 10:00 AM	Management Roundtable
10:00 AM – 11:00 AM	Options Selection for Municipal Solid Waste Landfills NESHAP Risk and Technology Review (RTR) (Tier 2, SAN 6838) MSW RTR OS 2.25.19v2 rev.docx
11:00 AM – 11:15 AM	**Free**
11:15 AM – 12:00 PM	General Discussion with Mike Stoker DERA eligibility TPs Wehrum Sto...
12:00 PM – 12:30 PM	General Discussion re: International Travel
12:30 PM – 1:00 PM	**Free**
1:00 PM – 1:45 PM	Meeting with SCAQMD (CONFIRMED)
1:45 PM – 2:00 PM	**Free**
2:00 PM – 3:00 PM	Senior Staff Meeting
3:00 PM – 3:45 PM	ENERGY STAR Partner of the Year Meetings and Awards 2019 ENERGY STAR Awards Br... 2019 ES Awards Recommendatio...
3:45 PM – 4:00 PM	**Free**
4:00 PM – 4:30 PM	Call with Phil MacNabb re: Sterigenics
4:30 PM – 5:00 PM	**Free**
After 5:00 PM	**Free**

Message

From: DeLuca, Isabel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0B021C30CBEE4637A7C7CA683E5E044A-IDELUCA]
Sent: 12/21/2018 7:04:46 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: Bill's calendar 12/10-12/21

Hi Josh,
Next week is calendar week, but I'm not in, so I'm hoping to get this cleared today. Can you take a look and see if it

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Isabel DeLuca
Office of Air and Radiation, US EPA
(202) 343-9247

Message

From: DeLuca, Isabel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0B021C30CBEE4637A7C7CA683E5E044A-IDELUCA]
Sent: 2/20/2019 2:43:46 AM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: Re: Bill's calendar -- questions

Thanks!

On Feb 19, 2019, at 5:30 PM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:

Deliberative Process / Ex. 5

From: DeLuca, Isabel
Sent: Tuesday, February 19, 2019 4:13 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Bill's calendar -- questions

Hi Josh,
Below is Bill's calendar for the last two weeks. I had a couple of questions, highlighted in yellow --first one, I'm

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Isabel DeLuca
Office of Air and Radiation, US EPA
(202) 343-9247

Message

From: cmsadmin@epa.gov [cmsadmin@epa.gov]
Sent: 2/1/2019 6:12:52 PM
To: Hamilton, Sabrina [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=68d3167c798743848aafcdfb73bb74f1-shamiltn]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Weaver, Marilyn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3fb70847cd9b4d7fbe7d6007179aceda-Weaver, Mar]; Carroll, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4e868254d9da47e1ab5831814a7ff2fb-Carroll, Ma]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]
Subject: CMS New Assignment - Matthew Davis - AL-19-000-2457

Control AL-19-000-2457 has been assigned to your office on 2/1/19 1:12 PM by Matthew Davis. Please go to the CMS webpage to view the details of the control.

Summary Information -
Control Number: AL-19-000-2457
Control Subject: RE: HYDROCHLORIC ACID PRODUCTION RTR AND ETHYLENE OXIDE IRIS ASSESSMENT
From: Duckworth, Tammy; Durbin, Richard J; Lipinski, Daniel; Schneider, Bradley; Foster, Bill; Casten, Sean

Note: This Email was automatically generated. Please do not attempt to respond to it. You can access this control at https://cms.epa.gov/cms. Questions or comments concerning CMS should be directed to CMS Support at 202-564-4985 or CMS Information@epa.gov.

Message

From: Terry, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A5F08A9BF1324B05BC02A7DD2EA695E4-STERRY]
Sent: 11/26/2018 7:20:14 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Ashley, Jackie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=01a9a3cadfa14c509d09cdae3498dd43-JASHLEY]
CC: Lubetsky, Jonathan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e125d09a658e48119789ccae5712b4a5-JLUBETSK]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]; Mroz, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=64b0c7f807df436a9b40ce52f7dec34c-Mroz, Jessi]
Subject: RE: Questions on 2 letters that came up for review
Attachments: Response AX-19-000-0779 Collins rev 11 26 18.docx

Josh,

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Sara

From: Lewis, Josh
Sent: Monday, November 26, 2018 1:41 PM
To: Ashley, Jackie <Ashley.Jackie@epa.gov>; Terry, Sara <Terry.Sara@epa.gov>
Cc: Lubetsky, Jonathan <Lubetsky.Jonathan@epa.gov>; Atkinson, Emily <Atkinson.Emily@epa.gov>; Mroz, Jessica <mroz.jessica@epa.gov>
Subject: Questions on 2 letters that came up for review

Deliberative Process / Ex. 5

Josh

Message

From: cmsadmin@epa.gov [cmsadmin@epa.gov]
Sent: 3/1/2019 4:39:58 PM
To: Hamilton, Sabrina [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=68d3167c798743848aafcdfb73bb74f1-shamiltn]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Weaver, Marilyn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3fb70847cd9b4d7fbe7d6007179aceda-Weaver, Mar]; Carroll, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4e868254d9da47e1ab5831814a7ff2fb-Carroll, Ma]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]
Subject: CMS For Concurrence - Pam Long - AL-19-000-2457

The response for control AL-19-000-2457 has been sent to you for concurrence on 3/1/19 11:39 AM. Please go to the CMS webpage to view the details of the control.

Summary Information -
Control Number: AL-19-000-2457
Control Subject: RE: HYDROCHLORIC ACID PRODUCTION RTR AND ETHYLENE OXIDE IRIS ASSESSMENT
From: Duckworth, Tammy; Durbin, Richard J; Lipinski, Daniel; Schneider, Bradley; Foster, Bill; Casten, Sean

Note: This Email was automatically generated. Please do not attempt to respond to it. You can access this control at https://cms.epa.gov/cms. Questions or comments concerning CMS should be directed to CMS Support at 202-564-4985 or CMS Information@epa.gov.

Message

From: Jennifer McConahy Personal Email / Ex. 6
Sent: 2/14/2019 10:37:41 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: Time's up, EPA. Solve the Sterigenics problem. - Chicago Tribune

Time's up, EPA. Solve the Sterigenics problem. - Chicago Tribune

https://www.chicagotribune.com/news/opinion/editorials/ct-edit-sterigenics-epa-air-pollution-cancer-20190214-story.html

Message

From: Jennifer McConahy Personal Email / Ex. 6
Sent: 2/14/2019 10:32:04 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: Suburban towns join lawsuits against Sterigenics and urge Illinois attorney general to shut company down - The Doings Weekly

Suburban towns join lawsuits against Sterigenics and urge Illinois attorney general to shut company down - The Doings Weekly

https://www.chicagotribune.com/suburbs/burr-ridge/news/ct-dhd-sterigenics-towns-respond-tl-0214-story.html

Message

From: Jennifer McConahy [Personal Email / Ex. 6
Sent: 2/14/2019 10:31:05 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Attachments: 19.02.13 - Wheeler Sterigenics.pdf

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 12/4/2018 7:19:06 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Subject: RE: Meeting re: Willowbrook samples
Attachments: Initial Data - November 2018.pdf

Josh – Please print (in color) for the 3:30 pm meeting. We may have more to send, but wanted to be sure you got this at least. Thanks.

Initial Data - November 2018....

-----Original Appointment-----
From: Wehrum, Bill
Sent: Monday, December 03, 2018 12:39 PM
To: Wehrum, Bill; Woods, Clint; Koerber, Mike; Rimer, Kelly; Davis, Alison; Smith, Darcie; Weinstock, Lewis; Bremer, Kristen; Chen, Xi
Cc: Harlow, David
Subject: Meeting re: Willowbrook samples
When: Tuesday, December 04, 2018 3:30 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: WJC - N 5400 + Video with RTP + Personal Privacy / Ex. 6

TO: Bill Wehrum, Clint Woods, Mike Koerber, Kelly Rimer, Alison Davis, Darcie Smith, Lew Weinstock, Doris Chen, Kristen Bremer

<< Message: Re: Willowbrook samples Nov 14-20 - All spreadsheets >>

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 12/4/2018 4:03:45 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: Fwd: Data Request Letter
Attachments: Data Request Letter_Sterigenics_12_03_2018.doc; ATT00001.htm

Clint - We discussed this verbally with Kathy, but thought it would be helpful to put it in writing. Let me know if you're okay with the letter. We can discuss at 3:30 pm today, if you wish.

Mike

Sent from my iPhone

Begin forwarded message:

> **From:** "Shappley, Ned" <Shappley.Ned@epa.gov>
> **Date:** December 4, 2018 at 10:37:57 AM EST
> **To:** "Koerber, Mike" <Koerber.Mike@epa.gov>
> **Cc:** "Segall, Robin" <Segall.Robin@epa.gov>, "Johnson, Steffan" <johnson.steffan@epa.gov>
> **Subject: Data Request Letter**
>
> Mike,
>
> Attached is the letter to Sterigenics requesting daily usage rates, let me know if you want to make any changes and then I will print the letter for your signature.
>
> Thanks,
>
> Ned Shappley | USEPA|OAQPS|AQAD|Measurement Technology Group
> 109 TW Alexander Drive (E143-02) | Research Triangle Park, NC 27711
> email: shappley.ned@epa.gov | Phone (919)541-7903

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 2/5/2019 1:03:32 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; DeLuca, Isabel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b021c30cbee4637a7c7ca683e5e044a-IDELUCA]
Subject: RE: Outreach

Clint: OPA has asked for your and Bill's okay with the heads up schedule, along with an okay about the invitees for the Illinois state officials.

Deliberative Process / Ex. 5

-----Original Message-----
From: Woods, Clint
Sent: Tuesday, February 05, 2019 7:44 AM
To: Davis, Alison <Davis.Alison@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>; DeLuca, Isabel <DeLuca.Isabel@epa.gov>
Subject: Outreach

Sorry for delay - Got confirmation that call between the Acting Administrator & the Senator took place last night, so we should be good to proceed on updated schedule. Thanks!

Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 2/4/2019 10:40:59 PM
To: Rodrick, Christian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6515dbe46dae466da53c8a3aa3be8cc2-Rodrick, Ch]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Block, Molly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=60d0c681a16441a0b4fa16aa2dd4b9c5-Block, Moll]; Palich, Christian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=330ad62e158d43af93fcbbece930d21a-Palich, Chr]; DeLuca, Isabel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b021c30cbee4637a7c7ca683e5e044a-IDELUCA]
CC: Lyons, Troy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=15e4881c95044ab49c6c35a0f5eef67e-Lyons, Troy]; Frye, Tony (Robert) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=58c08abdfc1b4129a10456b78e6fc2e1-Frye, Rober]; Ringel, Aaron [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1654bdc951284a6d899a418a89fb0abf-Ringel, Aar]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: PLEASE REVIEW -- Holding statement and revised heads up schedule

All – to accommodate Bill's schedule, we will move the webinar to 2 p.m.

From: Rodrick, Christian
Sent: Monday, February 04, 2019 5:39 PM
To: Woods, Clint <woods.Clint@epa.gov>; Block, Molly <block.molly@epa.gov>; Palich, Christian <palich.christian@epa.gov>; DeLuca, Isabel <DeLuca.Isabel@epa.gov>
Cc: Davis, Alison <Davis.Alison@epa.gov>; Lyons, Troy <lyons.troy@epa.gov>; Frye, Tony (Robert) <frye.robert@epa.gov>; Ringel, Aaron <ringel.aaron@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: PLEASE REVIEW -- Holding statement and revised heads up schedule

Hi all,

After another couple of calls, just ignore my email completely. Lets stick with the original hill time (attached) of 11:30-noon.

Thanks,

Christian Rodrick
(202) 564-4828

From: Rodrick, Christian
Sent: Monday, February 4, 2019 5:24 PM
To: Woods, Clint <woods.Clint@epa.gov>; Block, Molly <block.molly@epa.gov>; Palich, Christian <palich.christian@epa.gov>; DeLuca, Isabel <DeLuca.Isabel@epa.gov>
Cc: Davis, Alison <Davis.Alison@epa.gov>; Troy Lyons (lyons.troy@epa.gov) <lyons.troy@epa.gov>; Tony Frye (frye.robert@epa.gov) <frye.robert@epa.gov>; Ringel, Aaron <ringel.aaron@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: PLEASE REVIEW -- Holding statement and revised heads up schedule

Clint, and all,

Thanks for sharing this, after speaking just a moment ago with Clint it seems like it would be good for Bill to be on the call with the Hill Staff. Per our conversations with your team we have that time reserved on Bill's calendar for 1:00PM-1:30PM. (Assuming the appropriate other folks on your team can make it work with their schedules.) I've reattached the doc to reflect my small update on that.

Let me know if you have any questions or if there are any other concerns and I look forward to hearing from you all tomorrow. Thanks everyone,

Christian Rodrick
(202) 564-4828

From: Woods, Clint
Sent: Monday, February 4, 2019 4:39 PM
To: Block, Molly <block.molly@epa.gov>; Palich, Christian <palich.christian@epa.gov>; Rodrick, Christian <rodrick.christian@epa.gov>
Subject: Fwd: PLEASE REVIEW -- Holding statement and revised heads up schedule

FYI on our best guess for scheduling. We're taking a look at statement as well as developing backup schedule if we don't get go-ahead from AAW

Begin forwarded message:

> **From:** "Davis, Alison" <Davis.Alison@epa.gov>
> **Date:** February 4, 2019 at 4:20:30 PM EST
> **To:** "Woods, Clint" <woods.clint@epa.gov>
> **Cc:** "Koerber, Mike" <Koerber.Mike@epa.gov>, "Rimer, Kelly" <Rimer.Kelly@epa.gov>, "DeLuca, Isabel" <DeLuca.Isabel@epa.gov>
> **Subject: PLEASE REVIEW -- Holding statement and revised heads up schedule**
>
> Hi Clint,
>
> Please see draft holding statement below. Also, we've updated the heads up calls schedule. It will be tight, but we think we could do this in a way that would still allow us to hold the webinar on Tuesday. Please let me know your thoughts.
>
> Also, note that we've included you on the Hill staff call. Let me know if that's OK.
>
> **Draft holding statement:**

Deliberative Process / Ex. 5

Message

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 12/19/2018 9:51:10 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]
Subject: Sterigenics callers

The following people have called our main line since Monday morning, 12/17.

Their common, underlined theme is to close down the Sterigenics facility in Willowbrook immediately.

Citizen Name / Ex. 6

Delaney Rakosnik
Staff Assistant
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-0935
Email: rakosnik.delaney@epa.gov

Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 12/17/2018 5:29:53 PM
To: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: Draft agenda for Webinar

DRAFT Agenda:

Deliberative Process / Ex. 5

Message

From: Ashley, Jackie [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=01A9A3CADFA14C509D09CDAE3498DD43-JASHLEY]
Sent: 11/27/2018 11:57:00 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]
Subject: Fwd: Current Draft Agenda as of 6:30 pm
Attachments: image002.gif; ATT00001.htm; Willowbrook Community Forum Agenda draft 11.27.18 .docx; ATT00002.htm

Josh - updated agenda attached.

Begin forwarded message:

> **From:** "Wilson, Holly" <Wilson.Holly@epa.gov>
> **Date:** November 27, 2018 at 6:36:13 PM EST
> **To:** "Ashley, Jackie" <Ashley.Jackie@epa.gov>, "Davis, Alison" <Davis.Alison@epa.gov>, "Koerber, Mike" <Koerber.Mike@epa.gov>, "Rimer, Kelly" <Rimer.Kelly@epa.gov>, "Mckelvey, Laura" <Mckelvey.Laura@epa.gov>, Doug Sarno <sarno@theparticipationcompany.com>, Kristi Celico <kcelico@gmail.com>, "Cortelyou-Lee, Jan" <Cortelyou-Lee.Jan@epa.gov>, "Terry, Sara" <Terry.Sara@epa.gov>
> **Subject: RE: Current Draft Agenda as of 6:30 pm**

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 11/27/2018 10:52:59 PM
To: Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Weinstock, Lewis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=df30e068efb24a24b35d63be0596ad9b-LWEINS02]; Chen, Xi [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cb29e8e6f2064817a3a722f52e000f2b-Chen, Xi]; Shappley, Ned [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5fc7fde372054ab5ac38f24b9072b73d-Shappley, N]; Smith, Darcie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ae3c2377efb42879b943db8796ddc05-Smith, Darcie]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: FW: Sterigenics Press Release
Attachments: ATT00001.txt; Sterigenics Background EO Test Results Release 11.27.18.pdf; Sterigenics Ethylene Oxide Background Levels Data Map_181127.pdf

FYI

From: Hoffman, Kathy <KHoffman@sterigenics.com>
Sent: Tuesday, November 27, 2018 5:44 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>
Subject: Sterigenics Press Release

As discussed, attached is a press release on a recent third-party study that sampled and measured the EO Background levels throughout the Chicago area.

Kathy

Kathleen Hoffman
Senior Vice President - Global Environmental, Health & Safety and Technical Services
Sterigenics, A Sotera Health Company
2015 Spring Road, Suite 650
Oak Brook, IL 60523
Office: 630.928.1758
khoffman@sterigenics.com

This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail

or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Message

From: DeLuca, Isabel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0B021C30CBEE4637A7C7CA683E5E044A-IDELUCA]
Sent: 12/7/2018 2:19:39 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: link to you tube video of Willowbrook meeting

I haven't watched this yet:

https://www.youtube.com/watch?v=pkckxPBDn3c&feature=youtu.be

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 2/4/2019 9:41:45 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: Ethylene Oxide at Sterigenics facility in Willowbrook, IL -- Questions about EPA in CBS Chicago Article

Should I include Region 5, who may have some of the answers?

From: Woods, Clint
Sent: Monday, February 04, 2019 4:36 PM
To: Davis, Alison <Davis.Alison@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Fwd: Ethylene Oxide at Sterigenics facility in Willowbrook, IL -- Questions about EPA in CBS Chicago Article

All,

Any chance we might be able to discuss these topics on a call later this week? I am at a loss on most. Thanks!

Clint

Begin forwarded message:

> **From:** "Mazzuca, Gina (Durbin)" <Gina_Mazzuca@durbin.senate.gov>
> **Date:** February 4, 2019 at 2:12:10 PM EST
> **To:** "Woods, Clint" <woods.clint@epa.gov>, "Palich, Christian" <palich.christian@epa.gov>, "Frye, Tony (Robert)" <frye.robert@epa.gov>
> **Cc:** "Bales, Greg (Durbin)" <Greg_Bales@durbin.senate.gov>
> **Subject: RE: Ethylene Oxide at Sterigenics facility in Willowbrook, IL -- Questions about EPA in CBS Chicago Article**
>
> Clint,
> Let me know if you would like to set up a call. I've added my colleague Greg.
>
> Gina Mazzuca
> 202.224.2152
>
> ---
>
> **From:** Lyons, Troy <lyons.troy@epa.gov>
> **Sent:** Monday, February 4, 2019 2:09 PM
> **To:** Mazzuca, Gina (Durbin) <Gina_Mazzuca@durbin.senate.gov>
> **Cc:** Woods, Clint <woods.clint@epa.gov>; Palich, Christian <palich.christian@epa.gov>; Frye, Tony (Robert) <frye.robert@epa.gov>

Subject: Re: Ethylene Oxide at Sterigenics facility in Willowbrook, IL -- Questions about EPA in CBS Chicago Article

Adding Clint who can address your questions.

Sent from my iPhone

On Feb 4, 2019, at 11:06 AM, Mazzuca, Gina (Durbin) <Gina_Mazzuca@durbin.senate.gov> wrote:

Hi Troy,

Could you please get me in touch with whoever the appropriate person would be to discuss some EPA-related issues after a CBS Chicago article (https://chicago.cbslocal.com/2019/02/03/sterigenics-covered-up-toxic-emissions-operated-secret-plants/) has identified some concerning information regarding Sterigenics in Willowbrook, IL, as soon as possible?

Some of the concerns from the article are:

- If the state EPA allowed the company to do its own emission testing and reporting
- If in 2002, the EPA accused the company of failing to install monitoring systems and keep emission records.
- If the company was ordered by the EPA to test for ethylene oxide emissions and provide a report a year later and if this report is available.

- The article claims that before Sterigenics built their second warehouse in Willowbrook, they used three other places to handle all the overflow. Are there records from this overflow location? According to the article, one was on the 7300 block of South Quincy Street in Willowbrook. Two more were in Burr Ridge–one on Shore Drive and the other on Heathrow Court.

Thank you.

Gina Mazzuca | *AAAS/AIP Science & Technology Policy Fellow*
Office of Senator Richard J. Durbin | Democratic Whip
711 Hart Senate Office Building
Email: Gina_Mazzuca@durbin.senate.gov
Tel: 202.224.2152

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 12/21/2018 3:59:24 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: FW: unanswered questions

We will respond to this request.

From: Personal Privacy / Ex. 6 @gmail.com>
Sent: Friday, December 21, 2018 10:53 AM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>; Mckelvey, Laura <Mckelvey.Laura@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>
Subject: unanswered questions

Hello-
Many of my questions have not been answered yet I am continually promised answers. Please let me know the status of these answers:

1. Where is the TRI reporting for 2017?

2. The Willowbrook task for has asked the EPA 3 times for more testing at Sterigenics. Specifially to test while they are running all chambers, back vent emissions and fugitive emissions. They have not been responded to at all with this request.

3. Where is EtO air monitoring in the nation that is not around an EtO polluter? When will these results be available?

Jen McConahy

Message

From: Personal Privacy / Ex. 6 @gmail.com]
Sent: 12/19/2018 4:12:15 PM
To: William.Wehrum@epa.gov
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: Sterigenics
Attachments: 12-19 Press Release.pdf; 12-19-18 Reaction to 1984 Document.pdf; 1984-07-06-letter-from-IEPA-1.pdf; second_data_set_foot USEPA.pdf

Mr. Wehrum,

How much longer must we endure exposure to EtO? Clearly the government knew there was a problem 34 years ago, see attachment. You are doing NOTHING to protect our children. The clock started ticking for them when they were in utero and continues now as the levels are high in their schools. The webinar yesterday was not helpful in any way and was just another display of the EPA dodging questions and giving us the dame information over and over again. We would appreciate answers to all the questions we submitted back in November and also yesterday. We would appreciate a response from you in regards to this press release and information.

Personal Privacy / Ex. 6

stopsterigenics.com
fb.com/groups/stopsterigenics/
twitter.com/stopsterigenics
stopsterigenics@gmail.com

FOR IMMEDIATE RELEASE

Documents recently uncovered reveal Illinois EPA knew of excessive risk from EtO emissions at Sterigenics plant in 1984

Willowbrook, IL – The Stop Sterigenics Community Group has obtained a letter, through a FOIA request, from the Illinois EPA to Griffith Laboratories (currently known as Sterigenics) in 1984 indicating concerns of excessive risks associated with ethylene oxide emissions. Sterigenics has been in the news since a study was released indicating increased cancer risks in August 2018. While local government officials have called for authorities to shut down the Sterigenics Facility, the USEPA and Illinois Attorney General have been unwilling to request a shutdown, citing the need for more study. The recently received document indicates that the USEPA conducted studies as far back as 1984 and determined then that the emissions were a danger to the community. Current testing has indicated levels 887 times EPA's established safety maximum. Stop Sterigenics is calling on the USEPA, IEPA, Illinois Attorney General and DuPage County State's Attorney to shut down the plant immediately.

Attached:
Open Letter to Authorities from Stop Sterigenics
Letter from the Illinois EPA to Griffith Laboratories (Sterigenics), 1984
Willowbrook Air Quality Testing Results
USEPA Air Quality Testing results
Information available at www.stopsterigenics.com

Please contact StopSterigenics@gmail.com for any media requests

stopsterigenics.com
fb.com/groups/stopsterigenics/
twitter.com/stopsterigenics
stopsterigenics@gmail.com

December 19, 2018

William Wehrum - Assistant Administrator of the Air and Radiation Department, USEPA
Alec Messina - Director, Illinois EPA
Robert Berlin - DuPage County State's Attorney
Lisa Madigan – Illinois Attorney General

Dear Mr. Wehrum, Mr. Messina, Mr. Berlin and Ms. Madigan,

In 1984 Griffith Laboratories, the original name of the Sterigenics plant, applied for a permit to the Illinois EPA. In a response to their application, the IEPA expressed serious concerns about Ethylene Oxide emissions:

1) The IEPA predicted ambient air levels of Ethylene Oxide as high as 3.120 micrograms/cubic meter and as low as .09883 micrograms/cubic meter as far as one mile away from the plant.

2) The IEPA referenced a draft of a "USEPA Health Assessment Document" which provided evidence of human cancers of the pancreas, bladder, central nervous system and stomach associated with EtO exposure. The studies showed carcinogenic, mutagenic, leukemogenic and teratogenic effects.

3) The USEPA studies indicate that the highest acceptable ground level concentration of EtO is .007 micrograms/cubic meter

4) While the IEPA indicated that their current rules had not yet been updated to reflect what they now knew about ethylene oxide, they were uncomfortable with issuing the permit. Regardless, we know that the permit was subsequently granted to build the sterilization facility in Willowbrook.

In 2018, ambient air testing by the USEPA and independent air testing by the Village of Willowbrook indicated levels much higher than those originally modeled:

1) USEPA testing revealed EtO levels as high as 6.21 micrograms/cubic meter across the street from Sterigenics and .286 micrograms/cubic meter at Willow Pond Park, .95 miles away.

2) Village of Willowbrook indoor air testing showed EtO levels of .20 micrograms/cubic meter in Gower West Elementary School, .45 micrograms/cubic meter in Hinsdale South High School and .49 micrograms/cubic meter at Gower Middle School

3) Our children our breathing in as much as 64 times the USEPA's recommended ground level concentration.

The USEPA and IEPA claim that they cannot shut down Sterigenics because they need to conduct more studies. The USEPA and IEPA have been conducting studies since 1984 and has known for nearly 35 years that the Sterigenics plant was unsafe and would emit levels exceeding their safety threshold. We know from current testing that current air levels exceed safety standards by 64 times in our schools and 887 times in our Village Hall. How many more years of testing does the USEPA need to be convinced of the danger that our community is living in? How many more people need to become ill? Perhaps the Office of the Inspector General will be able to tell us why the USEPA has been unwilling to act.
Bill Wehrum, USEPA has the authority to order an immediate shutdown through powers granted by the Clean Air Act.
Alec Messina, IEPA has the authority to seal the facility under section 34B of the Illinois Environmental Protection Act
Robert Berlin, DuPage County States Attorney and Lisa Madigan, Illinois Attorney General have the authority to file an injunction in the courts to shutdown Sterigenics via section 43 of the Illinois Environmental Protection Act

Who will do their job and protect this community?

The Stop Sterigenics Community

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-2113

I.D. No.: 043110AAC
Application No.: 84060002

July 6, 1984

Griffith Laboratories
12200 South Central Avenue
Alsip, Illinois 60658

Attention: John Kjellstrand

This is in response to a telephone call from Mr. Dickinson to Mr. Cobb on July 3, 1984, concerning the environmental impact of ethylene oxide emissions from the six proposed sterilizers included in the above mentioned construction permit application.

According to the information provided by your company in the application, the maximum emissions of ethylene oxide were 40 tons per year during 1983. The data you provided included a building which may cause a downwash effect, therefore, the ISCST model was used in the analysis. ISCST utilized one year of meteorology (1975 Midway), the urban dispersion mode and the building downwash option. Model results were obtained at 180 receptors located on five rings surrounding the source. Each ring contained 36 receptors spaced at 10° intervals. The rings were spaced at radial distances of 100, 400, 810, 1205, and 1609 meters from the source. According to the modeling run, the maximum annual ground level concentrations of ethylene oxide will vary from 3.120 micrograms per cubic meter at 100 meters to 0.09883 micrograms per cubic meter at one mile outside the plant boundary line. A copy of the modeled annual concentrations is attached.

The ethylene oxide (ETO) toxicity data was derived from different literature references. One such document is a USEPA draft publication -- "Health Assessment Document - Ethylene Oxide - EPA 600-8-84-009A." A copy of this document can be obtained by calling USEPA at phone number 513/684-7562.

The toxicity data provides evidence of human cancers of the pancreas, bladder, brain, central nervous system and stomach associated with ETO exposure. Various animal studies have shown carcinogenic, mutagenic, leukogenic and teratogenic effects. These studies indicate that the acceptable ground level concentrations of ETO is 0.007 micrograms per cubic meter. While the Agency does not have any established standards for ETO at this time, nor are we suggesting that the acceptable concentrations referenced above are necessarily the numbers that we are committed to using, in our opinion the emissions from the Micro Biotrol facility appear to be several magnitudes higher than desirable.

B.E.
7-6-84
Dist I

EPA - DIVISION OF RECORDS MANAGEMENT
RELEASABLE
AUG 10 2016
REVIEWER JRM

EPA-HQ-2019-004008

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

We request a meeting as soon as possible to be able to better explain our evaluation and concerns. In our opinion, there are several methods by which emissions of ETO at this facility can be reduced. At our meeting, we wish to also discuss steps that can be taken to minimize emissions in order to reduce the ambient impacts to an acceptable level.

We are looking forward to hearing from you in the near future. In the meantime, should you have any questions, please feel free to call Jim Cobb, Harish Desai or me at 217/782-2113.

Very truly yours,

Bharat Mathur, P.E.
Manager, Permit Section
Division of Air Pollution Control

BM:JDC:sd/1392d/24-25

cc: Warren Dickinson, Griffith Laboratories
Dennis Lawler
Permit File
Region 1

ED_002408_00004183-00002

Ethylene Oxide Concentrations in Outdoor Air - 24-hour averages				
Sample site name	**Sampling Date**			
	13-Nov-18	**16-Nov-18**	**19-Nov-18**	**23-Nov-18**
	(µg/m3)	(µg/m3)	(µg/m3)	(µg/m3)
Gower Elementary School			ND	ND
Gower Middle School			ND	ND
Hinsdale South High School			ND	invalid
Water Tower			ND	0.893
Willowbrook Village Hall	invalid	0.824	6.21	0.284
EPA Willowbrook Warehouse	2.37	1.81	6.62	ND
West Neighborhood			ND	ND
Willow Pond Park			ND	0.286

Note: On Nov 13 and 16, 2018, samples were only collected at Willowbrook Village Hall and the EPA Willowbrook Warehouse. Sampling began at the remaining locations Nov 19, 2018.

ND – non detect. Ethylene Oxide was either not present in the sample or was at a level below the level the method could detect.

Invalid -- the sample did not meet EPA's field, shipping, laboratory or other quality assurance criteria.

Trans-2-butene was not detected in any of these samples.

Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 11/28/2018 2:53:32 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: Ashley, Jackie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=01a9a3cadfa14c509d09cdae3498dd43-JASHLEY]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Subject: Re: Illinois - meeting materials

Please add Jan Cortelyou-Lee

Sent from my iPhone

On Nov 28, 2018, at 8:51 AM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:

> Ok 12 ET it is. We'll invite you, Jackie, Mike K, Kelly Rimer, John Millet, Isabel, Clint. Any one else?
>
> ---
>
> **From:** Davis, Alison
> **Sent:** Wednesday, November 28, 2018 9:51 AM
> **To:** Lewis, Josh <Lewis.Josh@epa.gov>
> **Cc:** Ashley, Jackie <Ashley.Jackie@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Rakosnik, Delaney <rakosnik.delaney@epa.gov>
> **Subject:** Re: Illinois - meeting materials
>
> Hi Josh - I would like to request the earlier time. We have to get some Info to the facilitator based on the outcome of our discussion with Bill. Thanks
>
> Sent from my iPhone
>
> On Nov 28, 2018, at 8:48 AM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:
>
>> Thank you. Bill is interested in a check in meeting today. Do you all have a preference on 12-12:30 ET, 12:30-1 ET, or 2:30-3 ET?
>>
>> Also – Clint has a call into ATSDR but hasn't heard back yet.
>>
>> ---
>>
>> **From:** Ashley, Jackie
>> **Sent:** Wednesday, November 28, 2018 9:10 AM
>> **To:** Lewis, Josh <Lewis.Josh@epa.gov>
>> **Cc:** Koerber, Mike <Koerber.Mike@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>
>> **Subject:** RE: Illinois - meeting materials
>>
>> Josh – I'm re-sending this morning to update the Community Meeting Agenda and the Overview "run of show." I've re-attached all 5 documents for your convenience.
>>
>> Thanks.

Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 – ashley.jackie@epa.gov

From: Ashley, Jackie
Sent: Tuesday, November 27, 2018 4:19 PM
To: Lewis, Josh <lewis.josh@epa.gov>
Cc: Koerber, Mike <koerber.mike@epa.gov>; Davis, Alison <davis.alison@epa.gov>
Subject: Illinois - meeting materials

Josh –
Attached are some materials to support your discussion with Bill in advance of his trip to Illinois later this week. They include:

1. Overview of EPA activities – a general "run of show" for Wednesday and Thursday
2. Agenda for community meeting (Thursday, 7 p.m. Central time)
3. Opening remarks for Mike Koerber – current draft (For Thursday night community meeting)
4. Agenda for Lake County elected officials meeting (Wednesday, 2 p.m. Central time)
5. Agenda for Willowbrook elected officials meeting (Thursday, 11 a.m. Central time)

Please let us know if you have questions.

Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 – ashley.jackie@epa.gov

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 12/19/2018 1:15:20 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: FW: Trust?

Per our conversation

From: Citizen Name / Ex. 6
Sent: Tuesday, December 18, 2018 7:50 PM
To: bill.dart@illinois.gov; Brad.Frost@illinois.gov; Alec.Messina@illinois.gov; butler@ilhousegop.org <butler@ilhousegop.org>; Joel.creswell@mail.house.gov <Joel.creswell@mail.house.gov>; Durkin@ILHouseGOP.org; olsen@ilhousegop.org; dcook@strivestrategiesgroup.com; illinois32district@gmail.com; RepDistrict3@gmail.com; Assistance@StateRepCarolAmmons.com <Assistance@StateRepCarolAmmons.com>; staterepcostello@gmail.com <staterepcostello@gmail.com>; sara@staterepsara.com <sara@staterepsara.com>; repfine@gmail.com <repfine@gmail.com>; staterepgabel@robyngabel.com <staterepgabel@robyngabel.com>; repsonyaharper@gmail.com <repsonyaharper@gmail.com>; mike@repmikemarron.com <mike@repmikemarron.com>; mazzochi@ilhousegop.org <mazzochi@ilhousegop.org>; McDermed@ilhousegop.org <McDermed@ilhousegop.org>; repcmeier@gmail.com <repcmeier@gmail.com>; repmitchell@earthlink.net <repmitchell@earthlink.net>; staterepmoeller@gmail.com <staterepmoeller@gmail.com>; Repmorrison54@gmail.com <Repmorrison54@gmail.com>; repsente@gmail.com; skillicorn@ilhousegop.org <skillicorn@ilhousegop.org>; arthurt@ilga.gov <arthurt@ilga.gov>; statereplarrywalshjr@gmail.com <statereplarrywalshjr@gmail.com>; Senator John F. Curran <senatorcurran@gmail.com>; Senator Tammy Duckworth <correspondence@duckworth.senate.gov>; state_scheduler@durbin.senate.gov; chris@chrisnybo.org; mdunn@atg.state.il.us <mdunn@atg.state.il.us>; sao@dupageco.org <sao@dupageco.org>; ewallace@atg.state.il.us <ewallace@atg.state.il.us>; Cain, Alexis <cain.alexis@epa.gov>; Compher, Michael <compher.michael@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; EtO <EtO@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Mckelvey, Laura <Mckelvey.Laura@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Terry, Sara <Terry.Sara@epa.gov>; Wilson, Holly <Wilson.Holly@epa.gov>; mdjohnson@cdc.gov <mdjohnson@cdc.gov>; Wheeler, Andrew <wheeler.andrew@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>; Hatfield, James <Hatfield.Jim@epa.gov>; McGhee-Lenart, Renee <McGhee-Lenart.Renee@epa.gov>
Subject: Trust?

Day 119.
I don't remember the exact words uttered in today's webinar with the EPA but Assistant Administrator of the Air and Radiation Department William Wehrum's comment about mending our broken trust with Sterigenics was incredibly ignorant and insulting to the residents in the plume of EtO emissions.

Trust Sterigenics? Who is he kidding? Does he not remember his conversation with many of us on November 29th? Is he ignoring the 34 years of evidence that is available of this company's actions and inactions? This company started with little evidence that they had any real intention of being a decent member of this community. Facility management were told in a letter dated July 6, 1984 (before startup) about the danger of high emissions of ethylene oxide.

"The toxicity data provides evidence of human cancers of the pancreas. bladder, brain, central nervous system and stomach associated with ET0 exposure. Various animal studies have shown carcinogenic, mutagenic leukogenic and teratogenic effects. These studies indicate that the acceptable ground 1evel concentrations of

ETO is 0.007 micrograms per cubic meter. While the Agency does not have any established standards for ETO at this time nor are we suggesting that the acceptable concentrations referenced above are necessarily the number that we are committed to using, in our opinion the emissions from the Micro Biotrol facility appear to be several magnitudes higher than desirable."

They utterly destroyed even the smallest molecule of integrity in year one when they emitted over 130,000 pounds of ethylene oxide into our air. In the following years emissions reached over 233,000 pounds annually. Trust? They lost any respect and trust when they put off installing emission control devices for years and then resisted any verifiable evidence that the devices were functioning. They trashed their trust when they knowingly continued pumping thousands of pounds of a carcinogenic chemical in the air of nearby schools and homes. They destroyed their right to be in our community decades ago and they knew what they were doing when statements in their 1999 financial documents publicly acknowledged the financial repercussions and the dangers of using ethylene oxide. Their actions over the years demonstrated repeatedly that they were never worthy of our trust.

How dare Wehrum even utter the word "Trust" to us. What was Wehrum doing before he was appointed to the EPA? He was a lawyer for the chemical industry. Mr. Wehrum looked me in the eye on November 29th as I sat in front of him hooked up to my j-tube and told me to trust him. He told those gathered there that he was on our side. He told the community to trust him. Does he realize why his words today resulted in massive eye rolling and chins dropping? I swear my eyes rolled so hard I saw my brain.

Every air monitoring result to date has demonstrated levels of ethylene oxide in our air that far exceeds acceptable limits. Anything other than an immediate shutdown is an unacceptable response. No, Mr. Wehrum, we do not trust you and we will never trust Sterigenics. They burned that bridge long ago and there is no redemption. They must go.

The words today did not provide any additional answers. They did not offer any comfort or resolution. What they did do was further inflame a community. The words today pissed off already angry residents. Those words will be used as a rallying cry to others as our efforts will increase with each additional day. The holidays will be over soon, and, without that distraction, our voices are going to get louder and louder. Newly elected officials will be taking office in a few weeks and they have already voiced support. This community is hurting but we have not begun to fight. Too many of us have actually faced death head-on to be put off by the glib words of a political appointee.

Call me anytime Mr. Wehrum when you are ready assume the responsibility of your current position as opposed to your former position. But, please, speak no more of trust Mr. Wehrum, in my opinion, you do not know the meaning of the word you so casually used.

Citizen Name / Ex. 6

Sent from Mail for Windows 10

Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 12/18/2018 4:05:15 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; DeLuca, Isabel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b021c30cbee4637a7c7ca683e5e044a-IDELUCA]
Subject: Re: two potential questions ahead of the webinar today

Thanks. We noted those too.

Sent from my iPhone

On Dec 18, 2018, at 10:58 AM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:

> Had a vm from Citizen Name / Ex. 6 asking:
>
> (1) what is EPA's response to the Willowbrook Task Force's request that EPA do additional testing (she mentioned testing of all chambers and the back vents and fugitives too?). She asserted the TF has asked EPA 3X and so far hasn't gotten a response.
>
> (2) What is EPA's response to the IG's notice yesterday that they are reviewing EPA's efforts?
>
> Just flagging as potential questions we'll get this afternoon.
>
> Josh

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 11/10/2018 5:19:13 PM
To: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: Region 5 monitoring starting Tuesday

Thanks, **Deliberative Process / Ex. 5**

Deliberative Process / Ex. 5

From: Koerber, Mike
Sent: Friday, November 9, 2018 6:58 PM
To: Woods, Clint <woods.clint@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Fwd: Region 5 monitoring starting Tuesday

Clint: FYI - the first two sites in Willowbrook will start sampling on Tuesday. We will share with you our intended web post once it's drafted.

Deliberative Process / Ex. 5

Begin forwarded message:

> **From:** "Davis, Alison" <Davis.Alison@epa.gov>
> **Date:** November 9, 2018 at 5:45:21 PM EST
> **To:** "Koerber, Mike" <Koerber.Mike@epa.gov>, "Weinstock, Lewis" <Weinstock.Lewis@epa.gov>, "Shappley, Ned" <Shappley.Ned@epa.gov>, "Rimer, Kelly" <Rimer.Kelly@epa.gov>, "Bremer, Kristen" <Bremer.Kristen@epa.gov>, "Smith, Darcie" <Smith.Darcie@epa.gov>
> **Cc:** "Wayland, Richard" <Wayland.Richard@epa.gov>
> **Subject: Region 5 monitoring starting Tuesday**
>
> Hi all – Katie Siegel called to tell me R5 will be putting the first two cans out on Tuesday morning. They are drafting up a small index-sized card that their employees can hand to anyone who asks questions and will send me that for review this weekend. We'll need to get the info on monitoring posted as soon as we can on Tuesday.
>
> Mike, will you flag for Clint?
>
> Thanks
> -Alison

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 11/27/2018 9:49:33 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Ashley, Jackie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=01a9a3cadfa14c509d09cdae3498dd43-JASHLEY]
CC: Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; Mckelvey, Laura [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f3a2c5f041a442ea931ddb3d039236ff-LMCKELVE]
Subject: RE: Illinois - meeting materials

Thank you!

From: Lewis, Josh
Sent: Tuesday, November 27, 2018 4:49 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Ashley, Jackie <Ashley.Jackie@epa.gov>
Cc: Davis, Alison <Davis.Alison@epa.gov>
Subject: RE: Illinois - meeting materials

Yes – Clint just mentioned that too. I'll raise w/ both of them in the morning.

From: Koerber, Mike
Sent: Tuesday, November 27, 2018 4:45 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>; Ashley, Jackie <Ashley.Jackie@epa.gov>
Cc: Davis, Alison <Davis.Alison@epa.gov>
Subject: RE: Illinois - meeting materials

Also, we may need Bill or Clint to call ATSDR, who is now not planning to attend. I flagged this for Clint already.

From: Lewis, Josh
Sent: Tuesday, November 27, 2018 4:42 PM
To: Ashley, Jackie <Ashley.Jackie@epa.gov>
Cc: Koerber, Mike <Koerber.Mike@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>
Subject: RE: Illinois - meeting materials

Thanks! Just saw Clint…he's thinking we may need a ½ hour with Bill, him, and OAQPS tomorrow. We'll talk to Bill first thing (9 am) to see if he agrees. I'll be in touch either way.

From: Ashley, Jackie
Sent: Tuesday, November 27, 2018 4:19 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Cc: Koerber, Mike <Koerber.Mike@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>
Subject: Illinois - meeting materials

Josh –

Attached are some materials to support your discussion with Bill in advance of his trip to Illinois later this week. They include:

1. Overview of EPA activities – a general "run of show" for Wednesday and Thursday
2. Agenda for community meeting (Thursday, 7 p.m. Central time)
3. Opening remarks for Mike Koerber – current draft (For Thursday night community meeting)
4. Agenda for Lake County elected officials meeting (Wednesday, 2 p.m. Central time)
5. Agenda for Willowbrook elected officials meeting (Thursday, 11 a.m. Central time)

Please let us know if you have questions.

Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 – ashley.jackie@epa.gov

Message

From: Millett, John [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C067CAA6C93544F78C26AB08CC567D27-MILLETT, JOHN]
Sent: 10/30/2018 2:23:45 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: FW: EPA Sets the Record Straight After Being Misrepresented in Press

Fyi --

From: Grantham, Nancy
Sent: Tuesday, October 30, 2018 10:19 AM
To: Regional Public Affairs Directors <Regional_Public_Affairs_Directors@epa.gov>
Cc: Haman, Patricia <Haman.Patricia@epa.gov>; Thundiyil, Karen <Thundiyil.Karen@epa.gov>; Davis, Matthew <Davis.Matthew@epa.gov>; Richardson, RobinH <Richardson.RobinH@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; DeLuca, Isabel <DeLuca.Isabel@epa.gov>; Millett, John <Millett.John@epa.gov>
Subject: FW: EPA Sets the Record Straight After Being Misrepresented in Press

Nancy Grantham
Office of Public Affairs
US Environmental Protection Agency
202-564-6879 (desk)
202-253-7056 (mobile)

From: EPA Press Office [mailto:press=epa.gov@cmail20.com] **On Behalf Of** EPA Press Office
Sent: Tuesday, October 30, 2018 10:08 AM
To: Grantham, Nancy <Grantham.Nancy@epa.gov>
Subject: EPA Sets the Record Straight After Being Misrepresented in Press

EPA Sets the Record Straight After Being Misrepresented in Press

WASHINGTON (October 30, 2018) - Recent media reports have inaccurately misrepresented the actions taken by the U.S. Environmental Protection Agency (EPA) to address ethylene oxide (EtO) emissions at the Sterigenics facility in Willowbrook, Illinois. When informed in June 2018 of Region 5's monitoring results, EPA leadership acted decisively, working with state and local governments and others to lower EtO emissions at the facility and communicate risk to the public in a responsible way. Actions taken by EPA leadership include:

- Completed the process to quality assure and provide EPA regions and state coregulators the chance to review the draft National Air Toxics Assessment (NATA), a screening tool that highlights pollutants and emissions sources to study further in

order to understand the risk to public health. Based on preliminary data from NATA, EPA regional offices collected additional information to verify initial estimates. (Late 2017 - August 2018)

- Provided technical assistance to contextualize and communicate results of monitoring and modeling conducted by EPA Region 5 around the facility. (June - October 2018)

- Reviewed and approved construction permit application for Sterigenics to install additional pollution controls and protocol for additional stack testing to evaluate pollution control improvements. (June - September 2018)

- Released the most recent update to the National Air Toxics Assessment (NATA), which uses emissions data from the most recent National Emissions Inventory to estimate health risks from toxic air pollutants. The updated NATA estimates that ethylene oxide significantly contributes to potential elevated cancer risks, based on chronic, lifetime exposure, in some census tracts across the U.S., and these elevated risks are largely driven by an EPA risk value that was updated in late 2016. EPA offices reached out to state, local, and federal officials to notify them of results. (August 2018)

- Continues to update the ethylene oxide website information, including FAQs for Willowbrook and that outlines the two-pronged strategy for addressing EtO: 1) to review regulations for facilities that emit EtO, including the emission standards for commercial sterilizers (the rule that covers the Sterigenics facility in Willowbrook), and 2) to get additional information on EtO emissions to determine whether additional reductions are necessary. (August 2018 - present)

- Observed stack tests conducted to measure the actual emissions from control devices at the facility. (September 2018)

- Received initial stack test results from Sterigenics, indicating a control efficiency above 99 percent. (September 2018)

- Sent a detailed letter from EPA's Assistant Administrator for Air and Radiation, Bill Wehrum, to top elected leadership in Illinois outlining these actions and detailing plans to conduct additional air quality monitoring and risk assessment. (September 2018)

- Held an in-person meeting at EPA's Chicago office with elected officials and their staff to provide an update on these efforts. (September 2018)

- Received and are reviewing the final, full report from the stack tests conducted on September 20 and 21. The agency will use information from the stack test reports to estimate current emissions from the Sterigenics facility and to inform additional risk

assessment and ambient air monitoring work. (October 2018)

- Intends to conduct and communicate air quality monitoring and additional risk assessment activity around the facility. EPA is also engaging elected officials and community leaders to hold an additional public meeting in late November. (November 2018)

###

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1200 Pennsylvania Avenue Northwest
Washington, D.C. 20004

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Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 3/6/2019 4:11:47 PM
To: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: Q&As for review and approval
Attachments: Templates Responses (002) cw.docx; Other QA Ready for Review-03012019 (003) cw.docx

Deliberative Process / Ex. 5

From: Koerber, Mike
Sent: Tuesday, March 5, 2019 11:59 AM
To: Woods, Clint <woods.Clint@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: FW: Q&As for review and approval

Clint – Forgot to ask you about this yesterday. Let me know if you are okay with these. Thanks.

Mike

From: Koerber, Mike
Sent: Friday, March 01, 2019 3:20 PM
To: Woods, Clint <woods.Clint@epa.gov>
Cc: Josh Lewis (Lewis.Josh@epa.gov) <Lewis.Josh@epa.gov>
Subject: Q&As for review and approval

Clint: For your review and approval, attached please find two sends of Willowbrook-related Q&As:

Deliberative Process / Ex. 5

Thank you and let me know if you have any questions.

Mike

Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 12/13/2018 10:50:32 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: transcript
Attachments: YouTube transcript of Willowbrook meeting.docx

This is a you tube function – it's kind of rough, but can help you navigate

okay let's get started my name is Doug
00:13
Sarno I'm an independent facilitator and
00:15
I've been working with a team of folks
00:18
to help design this meeting tonight and
00:21
make sure we've arrived at a place where
00:23
all of you can have your questions heard
00:26
have information received in a way
00:29
that's understandable that's a complete
00:32
that gives you what you need in terms of
00:34
the questions you're asking right now
00:35
I'm going to talk a little bit about how
00:37
this meeting was designed who was
00:39
involved in the design what that means
00:40
in terms of how we're going to operate
00:41
tonight first I have to do the most
00:44
important thing in the evening or I
00:45
won't get big trouble the fire exits are
00:48
through the doors that you came in
00:50
through and also through this door over
00:52
here we won't be taking a formal break
00:55
so if you do need to use the restrooms
00:57
by all means you're free to through that
01:01
sign exit door just around the corner to
01:04
the right or the restrooms other than
01:06
that we are going to go probably right
01:09
through the allotted time at ten o'clock
01:11
we have to be moving toward the doors
01:14
and out the doors no later than 10:30 so
01:17
we're gonna we're gonna use that period
01:19
if we need to go over five or ten
01:21
minutes we can do that but we can't go
01:23
much past that our goal for tonight is
01:27
to really explain what is known and what
01:30
is not yet known about ethylene oxide
01:33
and the potential risks from eto from
01:36
the Willowbrook facility we we recognize
01:38
how important this information is to you
01:40
we recognize how important and how
01:44
concerned the community is around the
01:45
risks associated with this site and we
01:48
want to make sure that you're getting
01:49
the information you need and that we're
01:50
providing accurate clear and complete
01:53
information as much as is currently
01:56
available we also know that it can be
01:59
frustrating to find this information and
02:02

sometimes kind of hard to know what
02:05
information to trust and not to trust
02:06
and so we really want to hope that this
02:08
meeting begins to create a platform of
02:10
information for you to know where to go
02:12
an important step in providing that
02:15
information and and linking us to a
02:18
process
02:19
forward with EPA and with other agencies
02:21
so that you know that you're part of a
02:23
process moving forward you know where to
02:25
go for information you know the people
02:27
that are involved in this process and
02:29
working to to get us to some conclusion
02:31
to that end this meeting was designed
02:34
with help from from the community of
02:36
talking to the community and it's really
02:38
designed around community questions over
02:40
the past six weeks or so
02:43
EPA has been involved in weekly
02:45
conference calls with different
02:47
stakeholders different members of the
02:48
community different agencies at the
02:50
state and local level and hear their
02:52
concerns to talk about what's important
02:54
to them and to help use that information
02:56
to design this meeting our meetings
03:01
organized around those questions we'll
03:03
start with some basic welcome and
03:05
introductions from from the village of
03:08
Willowbrook from EPA from from from
some
03:11
state and federal representatives there
03:14
will be a community statement from the
03:16
stop Sturridge annex group and then EPA
03:20
will provide an overview of where we are
03:23
how we got here and what's happening
03:25
right now in this process then
03:29
representatives from EPA Illinois EPA
03:33
and and the Tri State Fire Department
03:38
will answer questions directly as
03:40
opposed by the community we have a
03:42
wonderful panel of experts here that are
03:45
going to come up and answer these
03:47
questions from the different agencies we
03:49
also have a great group of volunteers
03:50
from the community who volunteer to to

03:53
ask the questions that were posed by the
03:55
community and engage with the panels as
03:57
we move forward those those questions
04:00
have been organized into into three
04:03
different topics which that slide sort
04:06
of disappeared
04:09
so I I will read them to you the first
04:12
the first panel is community questions
04:15
related to ethylene oxide and what we
04:17
know and don't know about the risks
04:19
around the stereo genex facilities the
04:22
second is that will ask community
04:24
questions related to the stereo genex
04:26
will Willowbrook facility itself and
04:28
third questions related to future plans
04:31
to inform and engage the community
04:33
surrounding the willowbrook's facility
04:36
and then at the end we will reserve a
04:38
little bit of time to address some
04:40
questions that didn't didn't fit into
04:41
any of those topics and questions that
04:44
were generated today through the open
04:47
house the number of people filled out
04:48
question cards and questions we've
04:50
received since Monday when we had set
04:54
the deadline for the original input of
04:55
questions so we have another panel that
04:57
is Kristy your yeah sorry
05:05
pay no attention to the man behind the
05:07
curtain we will we'll we'll have that
05:14
final panel again ask questions and they
05:17
won't ask anyone up at the front of the
05:19
room who is a resource person to this to
05:22
this process we received well over 200
05:27
questions and we've spent the last week
05:30
really trying to organize those
05:31
questions put them into the organized
05:34
topics prioritize them and our panelists
05:37
have helped prioritize them in ways that
05:40
will address and respond to community's
05:43
concerns and issues we're not going to
05:46
get to every one of those two into
05:47
questions tonight we are prioritizing
05:50
them we are putting them in in order so
05:53
that we will get to the ones that we
05:55
believe in the community is helping us

05:56
it's the ones that are most important to
05:58
you some of the questions don't have
06:00
answers right now we recognize that
06:02
those questions will still be asked but
06:05
we'll explain why those those
06:06
don't exist yet and what we're doing to
06:09
hopefully find those answers in the
06:12
coming weeks and months other other
06:14
questions we might not get to because of
06:16
time but let me assure you that if you
06:19
email the question into the EPA you will
06:21
receive an email response you will get a
06:24
response to your question personally and
06:26
directly we will also in the coming
06:28
weeks post online a summary of the
06:32
answers to the questions that were
06:34
received and discussed tonight and and
06:36
some of the questions that we did not
06:38
get to but it is EPA's intent to answer
06:41
all the key relevant questions in
06:43
writing but that will take a little bit
06:45
of time we as you can see there's a
06:50
camera here tonight's meeting is being
06:51
live-streamed on Facebook that video
06:54
will also be made available in a coming
06:56
weeks online as as was the the meeting
06:59
in August so if you are moving around
07:03
please just try to not walk in front of
07:05
the camera as as the panelists are going
07:08
we'll also talk about and learn about
07:10
EPA's plans to continue this
07:12
conversation moving forward this is an
07:15
ongoing process and as more information
07:17
becomes available
07:19
EPA is committed to ok we're
07:29
facilitators not technical experts
07:31
obviously so sorry about that we're
07:36
worried so we recognize there's a lot of
07:39
passion in this room there's a lot of
07:41
energy you're hungry for information so
07:43
we want to move on you only asked we
07:45
really have a view is to treat the folks
07:48
who are on the stage and treat your
07:50
fellow citizens who volunteered to ask
07:52
the questions and and
07:54
the folks who were around you who want

07:56
to listen with respect so that we can
07:58
all hear what's going on we can listen
08:01
and and make sure that the questions get
08:03
asked and and the answers get hurt as I
08:07
said we'll be out of here by 10:00 p.m.
08:09
we're going to try to use the time which
08:11
we now and then as effectively as we can
08:14
so again thank you for joining us
08:16
tonight
08:17
and thank you in advance for for showing
08:19
that respect to your to your fellow
08:21
attendees here tonight and with that I'm
08:24
going to pass it along to mayor Trillo
08:26
to welcome us to Willowbrook here
08:29
tonight
08:47
some 90 days ago we were we changed his
08:55
village we were informed that something
09:01
was here that we weren't aware of I'm
09:06
not going to talk for a long time not
09:10
your typical politician I'd rather hear
09:11
the scientists talk so I'm gonna be
09:16
brief all I want to know is are my
09:19
people safe was there a danger before
09:27
are we in danger now and are we going to
09:31
be in danger in the future and I'm
09:34
counting on the EPA to let us know the
09:41
answer those three simple questions and
09:43
report and to provide the task that is
09:47
in the title of their name to help us
09:50
protect our village
10:01
that Thank You mayor chiller I'd now
10:04
like to ask Jim Ames come forward he's
10:10
the deputy Regional Administrator for
10:13
EPA Region five thank you Dad I'm very
10:20
glad to be making an introduction here
10:23
in just a moment and again my name is
10:26
Jim Payne I serve as acting deputy for
10:30
Cathy Stepp who is the regional
10:32
administrator for EPA's Midwest office
10:36
here in Chicago she is unfortunately in
10:39
DC with some matters
10:41
however some here may recall that at the
10:47
prior public meeting Cathy Stepp on this
10:51
stage said we will stick with this
10:54
community and EPA has had regular
10:58
briefings with local state elected

11:00
officials up provided updates regularly
11:04
to stakeholders a webpage with update
11:08
information and tonight we'll hear more
11:10
about activities since the last public
11:13
meeting again I'd like to I'd like to
11:17
welcome everyone here thank you for
11:19
coming and as part of this public
11:22
meeting we asked the top air official in
11:27
the country to come and speak with you
11:29
and it is with much pleasure and
11:33
appreciation that I introduced to you
11:36
that top air official bill where
11:44
good evening first of all I want to say
11:50
thank you to everyone for showing up
11:53
tonight the attendance is just fantastic
11:56
I walked into the room or much earlier
11:58
today and looked at all the seats and
12:01
looked at the size and I thought we're
12:02
never in fill this room and I think we
12:05
have standing room only so I think that
12:07
says a lot about the level of concern
12:09
that exists in the community I think it
12:12
says a lot about the commitment that
12:14
there is in this community to understand
12:16
what's going on and the commitment to
12:18
try to get to a solution and that's why
12:23
I'm here tonight and that's why several
12:26
key members of my team in my office are
12:28
here tonight so as Jim said and I'll
12:31
just repeat you know my title is
12:33
assistant administrator for the office
12:35
of air radiation at US EPA what that
12:38
means is I'm responsible for all federal
12:40
air programs so I am in fact the top
12:43
federal official in the country the very
12:47
first thing I wanted to say to you is we
12:50
care very much about what is happening
12:52
here and we know for ourselves that
12:56
there are emissions of ethylene oxide
12:58
from the stair genex facility our
13:02
preliminary assessment which I'll talk
13:03
about more and others will talk about
13:05
more as that has created some elevated
13:09
risk to people's health in the community
13:12
around the facility and we see our job
13:16
as to fully understanding what the

13:18
situation is assessing all of the
13:22
choices that are available for
13:23
addressing the risk that exists and then
13:27
doing everything that we can under the
13:28
law and under our powers of persuasion
13:30
to get to a place where we've
13:34
successfully addressed the issue that's
13:38
why we're here Jim said it before but I
13:42
think it's worth repeating at the outset
13:44
I was not at the first community meeting
13:47
but I know that a commitment was made at
13:49
the first community
13:50
that we would be back and that we would
13:52
be back before the end of November and
13:54
we are and I would like to say we're
13:58
back with a full understanding of what's
14:01
happening and with a solution that we
14:04
have put in a box in wraps and put on a
14:06
bow on top but we haven't we've started
14:10
a process it's a process that will take
14:13
some time not a lot of time from my
14:17
perspective but it's important that what
14:19
we do is done right that what we do is
14:23
based on the best information we can
14:24
generate that what we do is best based
14:27
on the best assessment of that
14:29
information and then that we make the
14:32
best informed decisions that we can as
14:34
to what may need to be done to find a
14:36
solution we're committed to that process
14:39
we're not at the end of that process so
14:41
we don't have answers for you tonight we
14:44
don't have all the answers I think we
14:45
may have some answers to your questions
14:47
but we're going to continue to
14:49
diligently work we're going to continue
14:51
to work as quickly as we can but as I've
14:54
told many people today over the past
14:56
couple days we're going to go quickly
14:58
but we're not going to be in a hurry
15:00
because if we're in a hurry we make
15:01
mistakes and that's something we don't
15:03
want to do here I wanted to spend a
15:10
couple of minutes and do three things
15:14
one is to look back and talk for a
15:18
minute about how we got to where we are

15:21
the second thing is to look around and
15:25
talk about where we think things stand
15:28
what we know what we don't know and the
15:31
third thing you want to do is look ahead
15:33
a little bit and talk about where we
15:36
think this process is going you know a
15:41
big reason why we're here today or
15:43
tonight is to hear from the year to hear
15:45
your questions to get your input and you
15:49
know
15:49
that information your questions your
15:52
comments your concerns matter greatly to
15:55
us and we will certainly factor it into
15:57
our thinking so you know this is a work
16:00
in progress and and what I have to say
16:02
is what we think right now but it very
16:05
much will be informed by what we hear
16:06
from you tonight so how did we get to
16:11
where we are let's look back for a
16:13
second and the way I think about it is
16:19
there were two important but independent
16:22
things happening that eventually
16:24
converged one of them was work on new
16:31
science and I run a big part of the EPA
16:35
but I don't run all of EPA and one part
16:37
of EPA that I don't run is our research
16:39
office the office of research and
16:41
development and one of the important
16:44
jobs of the office of research and
16:46
development is to do science to learn
16:49
new things and of course most of what
16:53
they focus on are the potential adverse
16:56
effects to human health or the
16:58
environment from pollutants of different
17:00
sizes and stripers in our case air
17:03
pollution so for a long time
17:07
we've known that ethylene oxide is toxic
17:11
to people that just stands to reason
17:15
that's just good common sense what is
17:18
stereo genex use the stuff for what do
17:20
others in industry use the stuff forth
17:23
they use it to sterilize stuff so
17:26
sterilants by definition or toxic to
17:29
something and this in the case of stereo
17:31
genex you know possible microorganisms
17:34
that might contaminate medical devices

17:35
and equipment but it's a pretty safe bet
17:39
that stuff that's toxic to bugs you know
17:44
could be it probably is toxic to people
17:46
and we've known that since forever and
17:49
we even put a number on it so part of
17:51
what our office of research and
17:52
development does is create action levels
17:54
for us because when we regulate when we
17:56
have to make decisions about are we
17:58
acting public health or not we try to be
18:01
analytical yeah we try to do science we
18:04
try to gather information we try to make
18:07
fact-based decisions so the office of
18:09
research and development and other
18:11
similar organizations come up with
18:12
numbers for us benchmarks that we use so
18:15
if we see exposure at a given level if
18:17
it's above the benchmark we likely have
18:20
to do something if it's below the
18:21
benchmark then maybe everything is okay
18:25
so we had a benchmark for ethylene oxide
18:27
it was out there for a long time
18:29
it said ethylene oxide is toxic but as
18:32
with most chemical substances there was
18:36
greater risk at higher levels of
18:37
exposure and little what we might
18:40
consider nominal rest is very low levels
18:42
of exposure and so we made regulatory
18:44
decisions according to that benchmark
18:48
but science is not fixed in stone and
18:53
part of what the office of research and
18:55
development does is follow the
18:57
development of science on things that we
18:59
care about including ethylene oxide they
19:02
began a process of reviewing that
19:03
benchmark a few years ago and reached a
19:05
new conclusion at the end of 2016 and
19:08
their new conclusion was ethylene oxide
19:12
is a lot more potent than we thought it
19:15
was you know to the order of 60 times
19:19
more potent than we thought it was
19:21
before so that was one I said there two
19:25
things that were moving along and that's
19:27
one thing that was moving and that that
19:28
work was being done it was important to
19:30
us but it wasn't because we were

19:31
thinking about Willowbrook it was
19:33
because we were thinking about other
19:34
similar facilities it was because we
19:37
need that kind of information to make
19:39
regulatory decisions that we make so we
19:42
weren't thinking about this we weren't
19:44
thinking about Willowbrook ylim that was
19:45
being done the other thing that was
19:48
happening at about the same time and
19:51
took a little bit longer for us to
19:52
finish his worked in my office was doing
19:55
and the work that we were doing we call
20:01
the national air toxics assessment and
20:04
for those of you who have talked with us
20:06
you know we love our acronyms we call
20:08
that naita
20:09
you might have heard of us talk about
20:11
national air toxics assessment is what
20:13
that stands for it's something we don't
20:17
do every year or we do it typically
20:19
every three or four years it's something
20:22
we don't have to do under the law most
20:24
of what we do in my office is because
20:25
Congress has told us we have to do it
20:27
you know our primary job in my office is
20:29
to implement the federal Clean Air Act
20:31
and most of what we do is because the
20:34
law says you have to go off and do that
20:36
which is fine I mean you know we're a
20:38
creature of statute in the case of the
20:41
NATO the next national air toxics
20:43
assessment we're doing it because we
20:45
want to and we want to because it's a
20:47
tool that we use to see if their gaps in
20:51
our regulatory programs that maybe we
20:53
should fill using our statutory
20:55
authority so when we do a national air
20:58
toxics assessment it's a two-step thing
21:03
and it is nationwide so we look at the
21:05
whole country including Willowbrook in
21:07
Chicago area and in Illinois but
21:10
everywhere else in the country as well
21:12
first thing we do is we generate what we
21:15
call an emissions inventory so we figure
21:17
out who's emitting stuff we care about
21:19
and we gather that information from a

21:22
lot of different sources some of it gets
21:23
are reported directly to us some gets
21:25
reported to states like Illinois which
21:27
we could get some gets reported the EPA
21:30
through other programs like water or
21:31
waste which we can get so we we comb the
21:36
country trying to find relevant
21:38
information about who's emitting what
21:39
and where
21:40
that's our inventory long list but
21:46
that's not that's only step one step two
21:48
once we have that inventory is then to
21:53
do an exposure assessment so we predict
21:55
based on those emissions what do we
21:57
think and you know what do we think
21:58
exposures like what outside of these
22:00
facilities and communities what how much
22:02
stuff is out there so we we have tools
22:05
we use to predict that it's an estimate
22:07
it's not a measurement and then once
22:11
we've done that we do a risk assessment
22:12
and we say based on these levels that we
22:15
predict might exist in the community are
22:18
they higher than these benchmarks we
22:19
have that I've talked about before lower
22:21
than the benchmarks we have what what is
22:23
it
22:23
show every time we do a NATO we learn
22:27
something so it's a useful tool to us
22:30
and we find those gaps that I talked
22:33
about we find that there are some
22:34
potentially elevated risks that we
22:36
didn't know about and then that gives us
22:38
direction that helps us set our
22:41
priorities and figure out how we should
22:42
use our resources in the air office in
22:47
this case because of the new potency
22:50
value for ethylene oxide what we learned
22:52
was the emissions that we knew about all
22:55
along you know what's happening here
22:56
isn't because there are a bunch of new
22:57
emissions out there a bunch of new
23:00
facilities a bunch of existing affiliate
23:02
facilities emitting more than they did
23:04
before sometimes we see that and that's
23:05
the source of elevated risk but in this

23:08
case there wasn't a big change in the
23:10
emissions inventory the change was how
23:13
potent we thought ethylene oxide was and
23:16
applying that new lower more stringent
23:19
potency value caused us to see that in
23:22
many areas of the country including
23:23
Willowbrook Illinois we predicted there
23:26
could be higher levels of risks than we
23:29
previously believed existed under the
23:31
fire lower potency value so that's that
23:39
happened earlier this year and that's
23:40
when this became a thing because
23:42
Willowbrook you know what we saw you
23:46
know we manage risk we regulate risk we
23:48
we you know risk assessment and risk
23:52
based decision making is something we do
23:53
on a daily basis so we see you know
23:58
estimated risks all the time and we have
24:00
to make regulatory decisions according
24:02
to what the law allows us that requires
24:04
us to do you know against those risks so
24:07
we have kind of a seat-of-the-pants feel
24:10
of kind of what typical risks are from
24:12
chemicals that are emitted into the
24:13
environment what the natus showed us
24:15
this time around though was in certain
24:18
areas of the country including
24:21
Willowbrook Illinois there were
24:23
estimated risks there were a good bit
24:25
higher than we typically see so
24:34
so that's the past you know let's talk
24:41
I'm kind of merging into the present so
24:45
we had to quickly decide what to do
24:48
about this information and the very
24:53
first we thought two things so again we
24:57
have two to two tracks here just like we
25:00
had looking back we had two tracks that
25:01
came together you know looking around
25:04
here and even kind of looking ahead
25:05
we're thinking about two tracks one
25:09
track is we're national regulators we
25:13
have authority and responsibilities
25:15
under the Clean Air Act to assess
25:18
emissions like this and in our world
25:21
under our law ethylene oxide is what we
25:24
call a hazardous air pollutant that's a

25:26
term of art under law which means it's
25:28
an air toxic toxic air pollutant okay so
25:32
there's a whole section of the Clean Air
25:34
Act very detailed very long that tells
25:38
us what to do about toxic air pollution
25:41
and you know what it requires us to do
25:45
initially is set technology based
25:49
emission standards we go out and figure
25:50
out how the stuff can be controlled
25:52
who's doing the best job of controlling
25:54
and then we make everybody else we do
25:55
this industry by industry by industry so
25:56
we do curling refineries and chemical
25:59
plants and steel plants you name it we
26:01
got like 150 660 of these regulations
26:04
for all different parts of industry
26:06
including ethylene oxides commercial
26:08
ethylene oxide sterilizers like sterile
26:10
it stereo genex but step one is to say
26:15
figure out what good controls are
26:18
available and make people make everybody
26:20
that's in this field install good
26:21
controls then step two is to do a risk
26:25
assessment and say after those controls
26:27
are installed and operated is there any
26:28
significant remaining risk if there is
26:31
significant remaining risk and we have
26:32
authority and responsibility under the
26:34
law to address it make it go away so
26:37
that's how our regulatory program works
26:40
so our our first reaction on getting
26:43
this information from data was we need
26:46
to go back to the
26:47
regulatory processes and in some cases
26:51
we have already regulated a second ago
26:53
we have standards in place for
26:54
commercial ethylene oxide sterilizers
26:56
like stair genex so in that case you
26:59
know clearly what we need to do is go
27:01
back and look at that regulation and say
27:03
is it good enough now that we know
27:06
ethylene oxide is more potent than it
27:08
was before
27:09
we started that process we have you'll
27:13
you'll meet some folks from my office of
27:16
air quality planning and standard the

27:17
group that does a lot of these national
27:19
standards they happen to sit down and
27:21
just outside of Raleigh North Carolina
27:23
and there's a group of people and you
27:25
know maybe not working right now but you
27:28
know working on the daily basis
27:30
reassessing the standards for commercial
27:32
and ethylene oxide sterilizers to go
27:35
through the process of deciding whether
27:37
it's the current standards are good
27:38
enough and if not to adjust them and
27:40
make them more stringent we have to do
27:44
that through rulemaking a very
27:46
deliberate legal process we can't just
27:48
tell people you must do this we can't
27:51
issue orders we issue regulations
27:55
regulations are kind of like laws
27:57
there's a process we have to go through
27:58
to enact them and we have to do it right
28:02
when we do regulations we have to
28:04
collect a bunch of data rate remember
28:06
regulating nationwide so we're looking
28:08
at the whole country and once we collect
28:11
the data we have to analyze it we have
28:12
to create a justification for the
28:14
standards that we won't impose we have
28:16
to propose them in a very formal way we
28:18
we published that I have to provide an
28:22
opportunity for public comment and we
28:24
should provide an opportunity for a
28:25
public comment we provide public
28:28
hearings we go through another or once
28:30
all that's done another assessment
28:32
process and we end up wind up you know
28:34
finally issuing a final rule with all
28:36
the supporting documentation and and
28:39
that's when rules become effective and
28:41
that's when people have an obligation to
28:43
meet our standards that process takes
28:47
time usually for a complicated rule and
28:52
these are complicated rules we're
28:53
talking about lots of months you know so
28:56
we're talking years not days not weeks
28:59
not just a few month
29:01
it takes time to do this right well
29:04
we've launched that process but we

29:08
quickly realize that you know in a lot
29:10
of other cases when we regulate you know
29:13
an industry as I said we we know risk
29:17
that's what we do and and we know in
29:21
many cases we need to regulate more and
29:23
bring risk down but the risks are not so
29:25
high that we or people potentially
29:28
affected have a real terrible concern in
29:31
the mean time so typically what we see a
29:33
relatively low risk that we're going to
29:34
make even lower in this case that's not
29:39
what we saw so even though we've
29:42
launched the regulatory process and even
29:44
though we will complete that regulatory
29:45
process in a while we decided that at
29:52
least for a certain number of
29:54
potentially higher risk facilities that
29:56
we should do something sooner so we went
30:00
through a process of figuring out which
30:02
are these facilities we should consider
30:04
higher risk and Willowbrook is on that
30:06
list and then we said well we will do a
30:12
case by case by case assessment look at
30:16
each of these facilities individually
30:18
and we'll go through a process not
30:22
unlike rulemaking so a process of
30:24
gathering information the process of
30:27
assessing that information and doing a
30:29
risk assessment on a case specific basis
30:31
but it'll be focused on the individual
30:34
facility and not focused on the country
30:37
as a whole which is what we do when we
30:39
issue our national rules that's an
30:43
important process because one you know
30:46
something I should have said earlier as
30:47
the national air toxics assessment is a
30:49
very useful tool to us it shows us gaps
30:52
where our regulations are not being
30:54
effective but the national air toxics
30:58
assessment for all the work we put into
31:00
it for all the information we put into
31:02
it all the time we take to do analysis
31:03
it's what we consider a screening tool
31:06
it's a rough cut it's not precise it's
31:10
directional so it tells us we think
31:12
there may be an issue here

31:13
but where we think when there may be an
31:15
issue it's a signal that we need to go
31:17
take a closer look we need to take a
31:18
deeper dive so for their country as a
31:21
whole we're going to do that through the
31:22
regulatory process but for these limited
31:25
number of potentially high-risk
31:27
facilities we're going to do
31:29
site-specific assessment sooner okay
31:43
okay it's being suggested I'm taking too
31:47
much time okay sounds like there's
31:51
support for that thought so I'll wrap it
31:57
up in a minute not in 30 seconds but in
32:01
a minute all right so we're doing a
32:03
deeper dive we're doing a deeper dive on
32:04
individual facilities Willowbrook is one
32:06
of those and you've seen some of that I
32:08
said the beginning we can't give you
32:10
total answers because we're in the
32:12
process of diving we haven't completed
32:13
our dive here first part of the dive is
32:16
to gather information so there has been
32:19
stacked testing at the facility so we
32:21
need to have a much better grip on what
32:22
they're actually emitting which is
32:24
really really important to us we've done
32:26
some avian monitoring and you saw from
32:28
the notice we issued last week that
32:30
we've learned a little bit about our
32:31
analytical techniques and they weren't
32:33
as good as we had hoped they would be so
32:34
we'll apply that learning going forward
32:36
and do additional ambient monitoring
32:38
we'll do some additional to use some
32:41
additional tools we'll do the risk
32:42
assessment and then in the relative near
32:45
future and we're looking at early next
32:47
year well we'll talk about timeline
32:49
later on we'll reach a point where we'll
32:54
feel like we have a really good grip on
32:55
what the risks look like from this
32:57
facility and that will arm us to know
32:59
what we think we should do and what we
33:03
think we should do in the way of seeking
33:06
requiring mandating additional emissions
33:08
reductions cuz only by getting

33:10
additional or emissions reductions would
33:12
we be able to reduce risk in the
33:14
community so so thank you for me along
33:19
and for those who know me I I could take
33:22
a lot more time to talk and look
33:24
we're talking with you as a group but
33:27
thank you again for coming thank you for
33:29
your commitment to the issue and I hope
33:31
you can appreciate we were very
33:33
committed to trying to solve achieve a
33:38
solution to what's happening here and
33:40
look forward to continuing to work with
33:41
you Thank You Val
33:45
thank you for your for your good good
33:48
humor in wrapping up Joel Cresswell is
33:50
here from the congressman Lipinski's
33:54
office yeah thank you so much
33:58
the congressman wishes he could be here
34:00
to speak himself he got held up on some
34:02
business in DC but he sent me out from
34:03
his Washington office and I'm gonna just
34:05
read a brief statement that he sent me
34:07
along with thank you for taking time out
34:09
of your busy schedules during the
34:11
holiday season to come to this meeting I
34:13
know that this is not how anyone wants
34:15
to be spending their time if we had our
34:17
way none of us would have to worry about
34:18
what it means for our health and safety
34:20
to be exposed to dangerous levels of
34:22
ethylene oxide I include my family in
34:25
this I live just about two and a half
34:28
miles from Sturridge annex to the
34:29
Northeast in the direction the exhaust
34:32
generally goes but for many reasons
34:35
here we are it's good that the EPA is
34:38
holding this meeting as I asked them to
34:40
do a while ago and I want to thank all
34:43
of the state and local officials that
34:46
work diligently with the EPA to make the
34:48
event happen one thing that's been
34:50
sorely lacking since we learned about
34:52
the health threat emanating from the
34:53
stereo genex plan is clear public
34:55
information and I hope we're going to
34:57
get a lot more of that tonight I wanted

35:00
to be at this meeting but was detained
35:02
by votes in Washington because Sarah
35:04
genex is a little outside of my district
35:05
I know there are many of you I probably
35:07
don't represent but I want to let
35:10
everyone know what I'm working on to
35:12
solve this problem and to reiterate my
35:14
commitment to continue to work hard
35:16
until we have some certainty about the
35:19
health risks from stereo genex and have
35:21
taken the right steps to protect our
35:23
health since we first learned of the
35:25
problem have been in close contact with
35:27
multiple federal agencies in September I
35:30
called for the US EPA to either
35:31
demonstrate that stereo genex is safe or
35:34
shut it down I called for the agency for
35:36
toxic substances
35:38
and disease registry to do a new health
35:40
risk assessment based on EPA's latest
35:42
air testing I called on EPA to provide
35:45
expertise and assistance to any local
35:47
communities that choose to do their own
35:49
air testing and I called on the EPA to
35:51
immediately update their ethylene oxide
35:53
regulations last week I introduced a
35:56
bill in Congress or require EPA to
35:58
update those regulations including a
36:00
requirement that all facilities capture
36:02
a pollution from their backgrounds as
36:04
Sturridge annex recently updated its
36:06
Willowbrook facility to do this week I
36:09
joined with senators Durbin and
36:11
Duckworth and representatives Foster and
36:13
Schneider and another similar effort EP
36:16
has been negligent in their duty to
36:17
protect public health
36:26
when Congress passed the Clean Air Act
36:28
it gave EPA broad discretion and
36:31
responsibility to regulate air
36:33
pollutants as they saw fit but they're
36:35
not doing their job in this case which
36:37
is why I'm working hard to hold them
36:39
accountable and to make things right I
36:41
know the main purpose for tonight's
36:43
event is for the experts to provide us

36:44
with information and for you to have the
36:47
opportunity to have your questions
36:48
answered so I'll keep my remarks brief
36:50
my website Lipinski House gov has a page
36:54
dedicated to this issue that's a
36:56
clearinghouse of information and has
36:57
contact info for my staff please don't
37:00
hesitate to contact me with questions
37:01
comments or concerns especially those of
37:04
you who live in the third District and
37:05
for constituents of mine who have
37:07
already submitted questions for the EPA
37:09
to my website I want you to know that
37:11
we've given those to EPA and will work
37:13
to make sure that they get answered this
37:15
issue is my top priority and I'll do
37:17
what it takes to address your needs
37:18
thanks again
37:25
Thank You state representative good
37:30
evening everyone I'm Deanne mazaki I'm
37:31
here first on behalf of Jim Jim Durkin
37:33
as well as myself so leader Durkin he
37:36
had a death in the family so
37:38
unfortunately he could not be here this
37:39
evening but he did ask that I read the
37:41
following statement to you since this
37:43
troubling report first came out in
37:45
August I've joined my colleagues
37:47
community leaders and thousands of
37:49
residents to demand answers we've been
37:52
receiving conflicting information by the
37:54
US EPA which has complicated this matter
37:57
even worse we are employers parents
38:01
spouses children workers and longtime
38:05
advocates of Willowbrook in the
38:06
surrounding communities we need accurate
38:10
clear-cut answers immediately from the
38:13
US EPA about the real-world threat of
38:15
ethylene oxide to our communities we
38:18
cannot proceed until we have all the
38:20
accurate facts before us and can make
38:22
assessments on how best to move forward
38:24
in order to ensure the health and safety
38:26
of our communities on behalf of myself
38:30
Deana Zaki in the 47th district I want
38:33
to thank every single person in this

38:34
room for being here because it's your
38:37
presence here that is finally starting
38:38
to drive some answers and hopefully some
38:41
change
38:47
I am a scientist I am a lawyer and it is
38:52
critically important that we focus on
38:54
getting the most accurate up-to-date
38:57
scientifically proven answers to this
39:00
critical health situation that's
39:01
affecting all of us in the last few
39:04
months I've read more than I thought I
39:07
ever would on ethylene oxide I've delved
39:09
into the scientific literature all the
39:11
way back to the 1980s to the present day
39:13
both here and internationally and as a
39:15
member of the General Assembly's
39:17
Environmental Committee I have witnessed
39:20
devastating health effects that have
39:23
been reported by residents in this
39:24
district I have reviewed ethylene oxide
39:28
test results from private businesses
39:31
that they're finding inside their areas
39:33
I've received heartbreaking letters from
39:36
constituents about cancer clusters but
39:40
we've had other tests and models that
39:41
have been inconsistent with not only the
39:43
EO model that the epa and that osha have
39:46
proposed but from other models as well
39:48
and what's been frustrating for us is
39:52
that when we try to get to the details
39:54
we get I don't know we get a
39:58
bureaucratic runaround or we get a bunch
40:00
of bureaucratic gobbledygook that is not
40:02
practical advice that we can use to
40:04
organize our lives and that is also what
40:08
has to stop and I hope that we will
40:10
finally start to get some answers here
40:13
tonight but if not leader Durkin and I
40:16
both want you to know we are here for
40:18
you we will continue to advocate for you
40:20
as well Senator John Curran who is also
40:22
here tonight so that you can not only
40:24
get relief at the federal level but at
40:26
the state level as well
40:28
[Applause]
40:40
so we have a short presentation from the

40:43
commune group stops Terrigen ik's
40:47
[Applause]
41:01
let's see if I can multitask here before
41:07
before we start our presentation
41:09
actually we just received a text message
41:11
that Northwestern Hospital in Chicago
41:14
has decided to stop use of all a saline
41:17
oxide
41:19
[Applause]
41:26
so with that good evening those of us
41:29
standing here represent the stop
41:31
Sturridge annex community we have Jeanie
41:33
Johanna Gabriella Ursula Margie Lauren
41:37
three Steve gonna stand up Melissa
41:44
Timothy John there's this community and
41:50
it's not just us up here as many of you
41:53
out here as well
41:54
we want to take a moment to clarify our
41:56
role in this forum the US EPA invited us
41:59
to participate to assist in asking
42:01
questions that we all have
42:02
we agreed to participate because we just
42:06
like you want answers and we want
42:08
accountability we just like you are sick
42:12
and tired of entities and officials
42:14
pointing fingers at each other we hope
42:16
to get some answers and some
42:17
accountability tonight on August 29th
42:24
many of us gathered here since the 80s
42:26
do a CT SD our report was released and
42:29
mayor trill of Willowbrook helped put
42:31
together a forum to inform the
42:32
communities and allow us the chance to
42:34
get answers from their authors it's been
42:36
a little over three months and during
42:38
that time we have come together as a
42:40
community it amazes me that I recognized
42:43
so many faces in the crowd
42:45
because of all of you we have research
42:48
permits we have deep dive the effects of
42:50
eto scientists doctors researchers
42:54
educators moms and dads came together to
42:57
find the truth not the truth that
42:59
Sturridge annex wants us to believe but
43:02
the truth of what really has happened
43:03
over the past three decades

43:11
Sturridge etics has had numerous amounts
43:13
of names over the years these are just a
43:16
few of them Sturridge anacs parent
43:18
company so tara is a five billion dollar
43:20
company Sturridge annex itself brings in
43:23
130 million dollars a year annually they
43:27
would like you to believe that they just
43:28
sterilized medical equipment they don't
43:31
toys for cereal boxes Avon gift baskets
43:34
baby basins powder deodorant and a
43:37
variety of nuts which none of these are
43:40
a medical necessity none they currently
43:43
operate out of two buildings kitty kitty
43:45
corner from each other the billions are
43:48
owned by George Rita's who provide a
43:49
stereo genex and 99 year lease both
43:52
buildings hold and emit eto 24/7 365
43:56
days a week even in today's even in
44:05
today's statement stereo genex keeps
44:07
trying to convince us that that they
44:08
followed rigorous safety protocols and
44:10
outperform what the rules require let's
44:12
take a look at their history a 1987
44:15
toxic chemical release inventory
44:16
reporting forms show that griffith micro
44:19
science currently stereo Jetix released
44:22
66 tons of eto into the atmosphere that
44:24
same year a scrubber was installed in
44:26
mid 1988 which had the ability to
44:28
eliminate about 99% of the toxic
44:31
chemical sound familiar
44:33
only 0.6 pounds per day was to be
44:36
emitted into the atmosphere from that
44:38
point which would equal two hundred
44:40
thirteen point six pounds a year a July
44:44
1989 report by the I EPA states Griffith
44:46
micro science released approximately 48
44:48
tons of eto into the air stereo Janek
44:52
stated that it had a cutback on
44:54
emissions since then that same year EPA
44:57
environmental scientist John Summerhays
45:00
stated in our judgment eto probably
45:02
causes cancer in humans as well and that
45:05
eto was cause for concern to both
45:07
federal and state epa this was in 1989
45:15
in 1996 DuPage County ranked top 20% of

45:18
all US counties in the release of
45:20
airborne carcinogens Griffith was third
45:23
top emitter twenty two thousand four
45:25
hundred twenty pounds reported as
45:27
emissions in nineteen ninety-six most of
45:30
which was eto what it's tera genic state
45:33
they said we are currently installing
45:35
supplemental equipment at our
45:37
Willowbrook facility to further control
45:39
emissions same story again ten years
45:47
later in 2006 we get the same story
45:49
stereo genex emails US EPA officials
45:52
stated that they control confirmed that
45:54
uncontrolled emissions had been escaping
45:56
from the building but not to worry
45:58
because the back vents were connected to
46:00
a control device and the emissions to
46:01
the atmosphere were significant reduced
46:03
they are not only contaminated the air
46:06
we breathe with permission from the
46:07
agencies here today that have given them
46:09
permits to do so but they have also been
46:12
non-compliant and had leaks of various
46:14
types over the years this is a FOIA
46:18
statement from the Illinois Emergency
46:19
Management Agency in October of 2013
46:22
while we were all decorating our homes
46:25
for Halloween and enjoying the fall
46:26
weather
46:27
Sturridge annex had an uncontrolled
46:28
release of 10 to 30 pounds of eto into
46:31
our atmosphere for more than three hours
46:35
this was due to faulty equipment that
46:38
failed the release was discovered almost
46:41
24 hours later please let that sink in
46:44
24 hours later no one else was notified
46:48
since Derrick genex followed the
46:50
response management protocol otherwise
46:52
known as the rpm that was written by
46:55
Kathy Hoffman VP of stereo Jetix
47:02
yet even then see regenexx VP Cathy
47:05
Hoffman clearly states that there is no
47:07
known or anticipated acute or chronic
47:09
health risks that are associated with
47:11
the release this is a dangerous and
47:13
reckless statement for the workers

47:15
exposed for the staff at the police
47:17
station across the street for the
47:19
pregnant mom were shopping at Target
47:21
that day and for the children who are
47:22
playing soccer at Midway park take a
47:25
look at these public officials today
47:26
where were they
47:28
what did they do with this information
47:30
Illinois EPA has granted permits to
47:33
stereo genex after this date can you
47:35
imagine when stereo genex uses ethylene
47:43
oxide in their sterilizations chambers
47:45
the byproduct is ethylene glycol
47:47
ethylene glycol is used for other
47:49
purposes including antifreeze stereo
47:52
genex is also making money off the back
47:54
end and selling their glycol product
47:56
that is sold and repurposed in 2013
47:59
apparently their system for collecting
48:01
the glycol failed and they polluted the
48:03
surrounding water the Attorney General
48:05
filed a complaint against Tara genex
48:06
alleging seven counts including water
48:08
pollution creating a water pollution
48:10
hazard permit violations and air
48:13
pollution in 2015 Sturridge annex
48:16
settled this lawsuit and a consent order
48:18
was ordered by agreement and Sturridge
48:20
annex paid a fifty thousand dollar fine
48:24
again no neighbors were notified
48:31
Sturridge annex representations about
48:33
the spill also speak to the
48:34
untrustworthiness and the intellectual
48:36
dishonesty of the company we received
48:38
email exchange between Sturridge annex
48:40
vp Cathy Hoffman Willowbrook 8th village
48:42
administrators him Halleck and others
48:44
record regarding this cycle spill
48:46
piecing together these emails the
48:48
following appears to have occurred tim
48:50
Halleck was on the site at the spill and
48:52
stair genex had already hired an outside
48:53
environmental waste cleanup company and
48:56
the to start cleaning this bill when
48:58
Halleck arrived the Sturridge annex
49:00
representatives started backtracking

49:01
saying that they tested the glycol and
49:04
they thought someone else had come by
49:05
and dumped it Halleck sarcastically
49:09
comment something commented something to
49:11
the effect of why is Sturridge annex
49:13
are taking such a large cleanup effort
49:15
if you don't believe you're at fault
49:17
Kathy Hoffman takes the sarcastic
49:19
statement and then alerts others telling
49:21
them and I quote we also discussed the
49:24
results with the village of Willowbrook
49:25
yesterday afternoon the village express
49:28
verbal agreement with our conclusion the
49:30
stairs Jerry Jennings does not seem
49:32
responsible Halleck responds in another
49:36
email to set the record straight that
49:37
the Hoffman made in an inaccurate
49:39
statement and he clarified that he never
49:41
expressed any such agreement this
49:43
company cannot be trusted in many ways
49:50
our community feels victimized not only
49:53
by Sturridge onyx but by the agencies
49:54
and the officials were supposed to
49:56
protect us Illinois EPA director Alec
49:59
Messina has indicated he is impotent to
50:01
his ability to help hamstrung by US EPA
50:03
standards and regulations
50:05
moreover over the last few months
50:08
details have come to light that
50:09
demonstrate more concern a notice to the
50:11
company then to the people being harmed
50:13
by it in December
50:19
in December of last year eight months
50:22
prior to the release of the ATSDR report
50:24
US EPA and Illinois EPA made Sturridge
50:27
annex aware of this issue
50:28
Sturridge annex then obtained a new
50:31
construction permit from Mussina's I EPA
50:33
to install the new scrubbers some have
50:35
argued that this was intentionally done
50:37
to make it more difficult for legal
50:39
action to be taken to halt emissions
50:41
while further testing was done Sturridge
50:44
Equis has had advance warning knowledge
50:46
and/or control over every aspect of
50:49

testing that has ever occurred after the
50:54
ATSDR after the ATSDR report how does
50:58
stair genex respond I'm pretty sure you
51:01
guys can guess it the same way they did
51:03
in 89 896 2006 and 2015 they said that
51:08
we are working to do better we have
51:10
installed new equipment we are reducing
51:12
emissions what makes this time different
51:17
well now we know and we won't let them
51:21
off the hook like these agencies and
51:23
entities have for all these
51:36
we hope that at the hearing had heard
51:38
Cathy Hoffman from Sarah genex tell us
51:40
they wanted to be good neighbors they
51:41
were shocked at what they were learning
51:43
more nonsense and lies in fact just two
51:46
days later stereo genex had yet another
51:49
spill of glycol on September 1st of 2018
51:55
my fingers don't want to flip the pages
51:58
the report we got through Oya shows that
52:01
on 9/11 2018 they had an ethylene glycol
52:03
spill of 7 to 27 gallons with an
52:06
estimated spill extent of 7,000 square
52:08
feet was any one of us informed about
52:11
this no what did stair Janek say this
52:17
time to Governor rauner on September
52:19
27th the same lies we quickly and
52:22
voluntarily took steps to reduce
52:24
emissions using pollution control
52:26
equipment we will reduce ethylene oxide
52:28
emissions by over 90 percent somehow we
52:32
don't believe them
52:41
Sturridge ethics has made some powerful
52:43
friends in the governor's office at the
52:46
iepa and in the chemical lobby through
52:48
this process we also have learned sadly
52:50
about the revolving door of the lodges
52:52
and officials who are supposed to
52:53
protect us many of you in this room have
52:56
watched live feeds of legislative
52:57
hearings and heard from industry
52:59
lobbyists or read the letters they've
53:01
written this includes the American
53:02
Chemistry Council Marc Beall the
53:05
ethylene oxide sterilization Association
53:07
which Kathy Hoffman is a member and the
53:10

Illinois Manufacturers Association
53:11
dotted Donovan Griffith some of you here
53:15
remember hearing testimony from Donna
53:16
Donovan Griffiths lobbying against
53:18
legislation to protect us from eto well
53:21
here's the picture of him and Alec
53:23
getting their flu shots together we can
53:25
only hope that the elected officials who
53:27
have to have to legislate this issue see
53:29
all of this for what it really is
53:31
we sure see it and we see you all doing
53:35
it for a paycheck
53:39
Kathy Hoffman has been part of
53:42
neurogenic since 1997 she has lobbied
53:44
for ethylene oxide she travels the world
53:46
promoting the products she wrote the
53:49
risk management program a program where
53:51
stereo genex tells this community on how
53:53
they will operate and notify the
53:55
community of any wrongdoings yesterday
53:58
Mark Johnson stated that according to
54:00
OSHA no violations have been reported
54:02
our workers being affected by EO at
54:04
stereo geniux at the last Holloman how
54:08
that took place here in August 29th
54:10
Kathy Hoffman was asked if she knew of
54:11
any employees that were injured her
54:14
response was not that I know of nothing
54:16
comes to mind and I'm paraphrasing here
54:18
well again that is false we have learned
54:22
of multiple workers who were injured by
54:24
eto exposures we have heard stories of
54:26
non-disclosures of fear speaking out we
54:29
know that there are more out there and
54:31
we're committed to finding them the
54:32
workers are the first ones that need to
54:34
be notified
54:43
how many more people must suffer until
54:47
the elected officials do something about
54:49
it
54:49
how many more need to die to convince
54:53
all of you sitting here that this is
54:55
wrong the answer should be zero because
54:59
one is too many we would like to take a
55:02
moment of silence and before we do we
55:05
will like all of those that are affected
55:07

those that have personally suffered
55:10
family members that suffer from
55:12
migraines nausea breathing problems
55:16
miscarriages and so many other ailments
55:19
for all of those that have lost loved
55:21
ones please stand up
55:41
thank you we appreciate that the US EPA
55:45
is here to directly communicate with our
55:47
community we hold you all accountable as
55:50
well our request to you update your
55:52
regulations and standards to meet the
55:55
science to meet the title of your
55:57
organization environmental protection
56:00
agency we are counting on you tonight
56:03
and every night hereafter when you pack
56:06
up and leave remember we are still here
56:09
breathing in this air some of us every
56:12
single day of our lives we are not your
56:14
guinea pigs we are not your test
56:16
subjects it is time for you to do right
56:19
by this community the next few pictures
56:23
are what stereo genic States safe in the
56:27
future we've seen what you've done under
56:30
the leadership of Cathy Hoffman you have
56:32
monopolized our town and the US and the
56:34
Illinois EPA with your own rules
56:35
regulations and testing you need to be
56:38
removed from this process
56:47
safe yesterday 66 tons 48 tons is not
56:53
acceptable we need to ensure that the
56:55
guidelines stay up-to-date safe today
57:00
standards for emissions don't include
57:02
public notification requirements when
57:05
something goes wrong standards for
57:06
emissions don't capture all sources of
57:09
emissions because of Illinois EPA and US
57:17
EPA have not updated the risk
57:19
assessments in 2008 they chose not to
57:21
update scrubbing efficiency requirements
57:24
to the latest 99.9% technology have not
57:27
followed up with the companies on
57:28
commitments to reduce emissions
57:32
Sturridge annex gets to proclaim that
57:34
they are compliant and safe we want to
57:37
ban eto
57:44
and we are all here everybody in this
57:48

room to tell Sturridge etics that we
57:50
will not stop until you are gone and
57:52
leave our community
57:54
[Music]
57:54
[Applause]
57:58
[Music]
57:58
[Applause]
58:17
Thank You arrangement thank you everyone
58:20
who was up here and first stop starett
58:22
Enix for helping with this process
58:24
tonight this is probably a terrible
58:27
juxtaposition
58:28
but stereo genex has offered up a
58:31
statement for tonight's meeting nobody's
58:35
going to read in we have printed out
58:38
copies and it is available will be
58:41
available on the table as you leave
58:42
tonight so if you want a copy of their
58:44
statement by all means pick one up on
58:46
the way out you know I'd like to
58:48
introduce Mike Harbor the Deputy Office
58:50
Director for EPA's office of air quality
58:52
planning and standards and Mike's going
58:55
to kind of give us a little bit of an
58:56
overview set the stage for where we are
58:59
in this process thank you thank you all
59:11
very much great turnout tonight you've
59:14
been very patient indulge me for five
59:16
more minutes and then we will turn to
59:17
you and your questions we'll have three
59:19
panels come up here and hopefully give
59:21
you answers thanks so I just want to
59:26
take a few minutes to talk about what
59:28
we've been doing what we will be doing
59:30
to help address and deal with ethylene
59:33
oxide in your community we've learned a
59:37
lot over the last couple of months but
59:39
there are still more that we do not yet
59:41
know we've been focusing on trying to
59:45
understand what's being emitted from the
59:48
facility and what's in the air that you
59:50
breathe so I'm going to talk about two
59:53
things very briefly emissions from the
59:55
facility and some recent air monitoring
59:58
that we've begun in the community
60:04
so as you're all aware actions were
60:07

taken back in late July to reduce
60:09
emissions and here you can see the
60:12
before on the left and the after result
60:15
of that there were stack measure
60:18
mistaken emission measurements taken in
60:20
late September and we received the test
60:22
reports in mid October we were actually
60:24
on site along with Illinois EPA to make
60:26
sure that the testing was done correctly
60:28
and we believe it was and the report
60:32
shows that emissions from the facilities
60:34
facilities work was reduced on the order
60:37
of about 90% is that enough we don't
60:40
know we don't know we still aren't sure
60:46
about what the current risk levels are
60:48
in the community so why don't we know if
60:51
this is enough well it's the yellow
60:53
portion of these bars the fugitive
60:56
emissions the leaks the emissions that
61:00
are escaping from vents and doors at the
61:03
facility we don't know really what those
61:05
emissions are and we need to understand
61:07
the total emissions from the facility so
61:10
we can accurately characterize the risk
61:12
in the community the yellow estimates
61:15
here those amounts those are numbers
61:17
estimated provided by the company we
61:20
don't know if those numbers are right so
61:23
we are doing air monitoring we are
61:25
gathering additional information to see
61:28
if those numbers need to be adjusted
61:30
once we have that information then we
61:34
can do an accurate risk assessment I
61:37
know everyone wants answers now but it's
61:41
important to gather the necessary
61:43
information do the science right to make
61:46
sure that we have sufficient information
61:47
to make informed decisions
61:55
the other thing I want to talk about is
61:57
the recent air monitoring that we've
61:58
begun at eight locations around the
62:00
communities this started a couple weeks
62:04
ago we do not have data back yet but as
62:07
soon as we have data it will be posted
62:08
on our website and we make that publicly
62:10
available and we want to continue to
62:13

engage with you in mid-december will
62:16
hold a webinar will will explain the
62:17
data that we've collected we don't want
62:19
to just throw it up on our website and
62:20
not tell you what it means we want to
62:22
actually walk people through it and take
62:24
questions about that information that
62:26
we've collected so periodically we will
62:28
be in touch with you to talk about what
62:30
all that information means monitoring
62:35
for ethylene oxide is very challenging
62:36
we've said for some time that the
62:38
current methods are not very sensitive
62:40
that we can't measure down at very low
62:42
levels that we expect to see throughout
62:44
the community also we've learned
62:47
recently because we don't have a lot of
62:51
experience measuring through this
62:52
particular chemical that there's a
62:54
potential interference issue that was
62:57
the statement we posted on our website
62:58
last week I don't know if that means
63:02
previous measurements are invalid
63:04
we just don't know if that interference
63:07
issue was a problem or not going forward
63:10
with these measurements we will quantify
63:12
ethylene oxide we will quantify this
63:15
other chemical that we think is possibly
63:18
causing the interference so we'll be
63:19
able to tease that out so we'll have
63:22
more accurate information going possible
63:24
going forward the reason we shared that
63:27
information was not to discredit past
63:29
work that was done but to be transparent
63:31
about the science that we are currently
63:33
doing and to share the latest
63:35
information with all of you you might be
63:38
wondering if that statement means that
63:40
we are no longer concerned about
63:42
ethylene oxide in this community and
63:44
that was not our intent at all we are
63:46
still very much concerned we are here
63:48
tonight you have our top air official
63:50
from EPA's attention and he is here
63:52
tonight we are still very much concerned
63:54
and want to get to a reasonable solution
63:57

here
63:58
we'll be back to meet with all of you as
64:00
soon as we have more information as I
64:03
said we're going to be providing
64:04
periodic updates we'll have conference
64:06
calls with community leaders and others
64:08
will be providing webinars as necessary
64:12
and when we complete our risk assessment
64:14
in a couple of months we'll be back and
64:17
share those results with you that is the
64:19
key piece of information that we need to
64:21
make our regulatory decisions and
64:23
determine how much more emissions need
64:25
to be reduced from this facility so
64:28
thank you very much for your time and
64:30
attention I'll turn it back to Doug and
64:32
we can finally turn to your questions
64:34
thank you you can hang on to that one so
64:38
as we said we're we're really having our
64:41
main event here as these three panels
64:43
we're going to start panel one here in a
64:45
second Mike's gonna be joined on the
64:47
stage with Kelly Reimer so you guys can
64:50
go ahead and pick a seat but we also
64:52
have in addition to the panelists that
64:54
are going to be up on the stage we have
64:56
a number of experts here in the in the
65:00
audience who we can call on and the
65:02
panelists can call on to answer
65:04
questions and so I want to just let them
65:06
introduce themselves folks who are kind
65:08
of extra experts here to help if you
65:12
stand up and I'm gonna let you pass
65:13
around the microphone and just introduce
65:15
yourself and where you're from
65:19
good evening I'm Michele college where
65:21
they TST are here in region 5 80s tiaras
65:24
a branch of the Centers for Disease
65:25
Control and Prevention mark Johnson and
65:32
the Regional Director for a gist here
65:33
85 hi I'm Susan Buchanan I'm a physician
65:38
at UIC in environmental health among
65:41
children and adults Clint woods on the
65:47
deputy assistant administrator at EPA's
65:48
office of air and radiation in
65:50
Washington DC
65:52

[Applause]
65:55
hi I'm Laura McKelvey I'm in the office
65:58
of air quality planning and standards
66:00
and I am the person who will be leading
66:03
the ongoing engagement with you guys as
66:05
we're webinars and setting up the
66:08
opportunities for reporting out with you
66:10
guys
66:12
hello my name is Ned Chaplin with the
66:14
office of air quality planning and
66:16
standards we have we have any others
66:22
that I missed hello my name is Ed Nam
66:28
I'm the director of the air and
66:30
radiation division here in EPA region 5
66:36
Alexis Kane in the air toxics program
66:38
and reaching five hi I'm Katie Siegel
66:43
I'm also with the air toxics program
66:45
here in region 5 so I'm gonna ask Mike
66:49
and Kelly to come on up and and have a
66:53
seat and our two questioners today are
66:57
Mayor Tom Hinshaw and Ursula two
anyway
67:02
from stops neurogenetics they've been
67:06
working with the questions these
67:08
questions were put together in a very
67:13
rapid fashion over the last two weeks as
67:14
they were coming in trying to get them
67:16
organized trying to get them in in a
67:18
fashion that allows us to have a good
67:21
conversation and we really appreciate
67:23
the effort of the questioners themselves
67:25
to go through the questions and help
67:27
organize them into a fashion that allow
67:29
them to ask so we're going to leave it
67:30
up to them they have the ability to
67:33
disel echt how they want to propose
67:35
those questions our panelists will
67:37
answer to the best of their ability
67:39
pulling other experts as they need so
67:41
I'll turn to the questioners
67:48
I think I need to ask a first question
67:51
that is was not included as was stated
67:55
earlier today the risks appear to be
67:57
high and measurement methods are limited
68:00
why has Sarah genex been allowed to stay
68:03
open while further assessments are made
68:06
[Applause]

68:14
so I might ask bill if you'd like to
68:17
help me on this one as well being our
68:19
top ear official but we do have
68:21
authority under the Clean Air Act to
68:25
address under emergency situations the
68:29
operation of various facilities we have
68:32
a very limited ability to take temporary
68:35
action our commitment is to try to find
68:40
a long-term solution that is sustainable
68:43
for this community okay I'll elaborate a
68:52
little bit we regularly you heard me
68:56
saying I went on too long obviously but
68:59
we regulated a lot of different
69:00
chemicals from a lot of different plants
69:02
from in a lot of different places and we
69:05
see elevated risk a lot and the answer
69:10
for us cannot be every time we say let's
69:12
see elevated risk we demands facility
69:16
shut down until it can be resolved we
69:22
right because we operate the opposite
69:26
way which is
69:32
folks if we can let the answers get out
69:35
of it we'll get out of here right but I
69:39
thank you for your input and I do know I
69:42
truly mean that I mean that's why we're
69:43
here that's why this is a community
69:45
meeting because we know you care and I
69:48
hope I hope by the end you'll realize
69:50
that we care too but but you know yes
69:58
the common was actions speak louder than
70:00
words for those who didn't hear right
70:04
but you've heard us say you've heard me
70:07
say it in mic say it already and you'll
70:08
hear it plenty of times tonight you know
70:11
we try to be deliberate we try to be
70:13
deliberative and we try to gather fact
70:15
and we try to act on fact and the very
70:18
first thing we need to do is understand
70:20
as completely as we can what the
70:22
emissions are and that arms us with the
70:23
information we need to know what needs
70:26
to be done and if we act before we have
70:28
fact we're not doing anybody a service
70:32
we're not doing you a service because
70:33
the next time maybe that decision goes
70:35
against you so we we have to have a

70:40
logical process we have to have a fact
70:42
driven process ultimately we have to
70:44
have a legal process and what that means
70:46
to us is we act deliberately we act
70:49
quickly and we assess problems and we
70:53
try to solve problems that's exactly
70:55
what we're doing here thank you
70:57
how long does methylene oxide stay in
71:01
the air and houses it degrade ethylene
71:05
oxide could stay in the air for up to
71:07
about a couple of months and in terms of
71:14
degradation often it's it's fairly
71:16
stable and actually it it will it will
71:20
move with the air and that's really how
71:22
it will leave the area
71:33
so just to clarify the amount of
71:36
ethylene oxide released from
71:38
sterilization facilities like stereo
71:39
Jetix accumulates because more is added
71:42
to the air every day and it takes a long
71:44
time to degrade correct
71:48
thank you but but let me just add it
71:52
disperses in the atmosphere so the air
71:54
moves whatever is emitted released it
71:58
moves with the air downwind it moves
72:00
away from the facility
72:13
does it exercising outside near stereo
72:16
Jen expose a greater risk than those who
72:18
don't
72:19
I'm sorry can you repeat that I couldn't
72:21
hear the listeners does outdoor exercise
72:23
expose you to greater risk than those
72:26
who don't exercise outdoors so when
72:29
somebody exercises outdoors they breathe
72:32
more and so there is more more exposure
72:36
they we do we are more because we're
72:40
very concerned about long-term effects
72:43
so over a lifetime
72:46
periodic exercising may or may not
72:49
increase your exposure but when you when
72:52
your exercise you do breathe more and I
72:54
don't know if they just your doctor
72:56
began and wants to add hey thank you
73:01
does eto accumulate and drywall carpet
73:05
and other fibrous materials there's not
73:09
a lot of information on that there's not

73:14
been a lot of testing ethylene oxide for
73:17
us as being a chemical that we need to
73:21
learn about is relatively new the
73:23
increased Poston C that was discovered a
73:27
couple years ago has made us focus much
73:30
more on ethylene oxide than we had
73:32
before before was one of the many
73:35
pollutants in the urban and a soup now
73:37
it's something that we really need to
73:39
focus on so there's not a lot of
73:40
information what our indoor office
73:43
spokesman told us is that they don't
73:46
expect it to accumulate but there's just
73:49
not a lot of data to understand that and
73:52
that's what more work needs to be done
73:53
on that to really
73:54
understand it so outside of actual items
74:02
that it could accumulate on has there
74:03
been testing of just indoor air levels
74:05
of ethylene oxide and what were those
74:08
results US EPA has not done at any
74:12
indoor air testing what we do and we do
74:18
our assessments we usually do
74:21
assessments that use very very powerful
74:25
models because those models can get us
74:27
an understanding of what's in the air at
74:29
very low levels when we use those models
74:31
we make the assumption that the outside
74:34
air is the same concentration of the
74:36
inside air we make a an assessment so we
74:39
don't want to underestimate the risks so
74:42
we don't test inside to determine is
74:44
there a difference between indoor air
74:46
and outdoor air we make the assumption
74:48
when we are doing our assessments that
74:50
going to make a decision on whether or
74:52
not to and how far to reduce those
74:54
emissions we assume that we are
74:57
breathing the same amount when you're
74:59
indoors is when you're an app when
75:00
you're outdoors that will help us avoid
75:02
under estimating the risks and what
75:06
happens if you are under estimating
75:08
those risks and it doesn't commute
75:09
indoors our risk assessments are
75:13
reasonably conservative but there is a

75:15
possibility that that if ethylene oxide
75:19
does accumulate there would be an under
75:22
estimate again or indoor air folks say
75:26
that that's not expected but more work
75:28
needs to be done I give why is ethylene
75:33
oxide used to sterilize spices
75:35
agricultural products cosmetics toys and
75:39
other things ethylene oxide is a very
75:43
powerful fumigant it it kills microbes
75:46
it kills germs it's extremely and that's
75:52
yes yes it is ethylene oxide is a very
75:56
powerful
75:58
does it harms things we want harmed like
76:02
we want to get rid of if we want our
76:04
band-aids when I put my band-aid on I
76:07
want to make sure that band-aid is
76:08
sterilized
76:09
but with that means it also can harm
76:12
people and that's why we are here to do
76:14
get more information about what's being
76:17
emitted from the facility do an
76:20
assessment to better understand what the
76:22
risks for all you guys are what
76:28
alternatives to eto are there and what
76:31
are federal agencies doing to encourage
76:33
or require shifting as much of the
76:36
necessary sterilization need to those
76:38
alternatives yeah that's not a question
76:41
it isn't it would did my expertise I
76:43
don't know if we have somebody that can
76:45
answer that question not sure we have an
76:50
answer tonight we will definitely
76:51
provide an answer for you on that one
76:55
how long has it been known that ethylene
76:58
oxide is kharsa genic at much lower
77:01
levels than previous understood so the
77:07
EPA periodically evaluates chemicals to
77:10
determine how toxic they are the final
77:15
assessment of the last time you created
77:17
that was in December of 2016 before that
77:21
we had a very strong suspicion we called
77:25
it a probable human carcinogen so we've
77:27
known ethylene oxide is bad stuff for a
77:29
long time the new data that came in in
77:36
the early 2000s was human data and that
77:40
information was used to develop the new

77:42
toxicity value and that's when the the
77:46
realization that ethylene oxide was much
77:48
more toxic than previously understood
77:51
was determined and that information was
77:55
final in December of 2016
78:02
you've already done two studies why are
78:05
you doing another one so I believe the
78:08
two studies that you're referring to is
78:10
the the Nationalists air toxics
78:14
assessment NATO that bill walked through
78:16
which sought to answer the question are
78:20
there places in the country where we
78:21
need to look further and do more
78:24
detailed analysis to understand what the
78:26
real risks are so that was the first
78:29
analysis we called a screening analysis
78:31
it doesn't it doesn't say what anybody's
78:32
risk is it says we need to do more work
78:35
to understand the whether or not there's
78:39
a risk that needs to be dealt with I
78:41
believe the second study you're talking
78:43
to is the ATSDR study that Michelle and
78:46
Mark did and that took a little bit
78:49
closer look at just the emissions from
78:52
stereo genex and asked a similar
78:55
question if those emissions lasted for a
79:00
long period of time at the level that we
79:01
had from those snapshots is there a
79:05
public health issue and that answer was
79:06
also yes the the next steps is to do a
79:11
very detailed analysis that will help us
79:15
understand much better what levels of
79:19
air what levels ethylene oxide in the
79:21
air are you all breathing and then we
79:23
couple that with the information about
79:25
how toxic it is I will have a better
79:27
understanding of what the risks are
79:30
thank you it looks like the amount of
79:34
eto used as Tara genex was higher in
79:36
prior years does that mean that the risk
79:39
was higher in those prior years we agree
79:44
that we know that the emissions were
79:48
higher in previous years therefore what
79:50
you all were breathing in previous years
79:52
was higher and that yes that does mean
79:54
that the risks be risks in the past were

79:58
higher than they are
79:59
we are now so at those higher risks
80:06
what were the long-term effects of those
80:09
risks as opposed to the risks that are
80:11
being accumulated now can you aap I'm
80:14
not sure I understand the question so
80:18
the volumes that were being emitted were
80:21
higher before great what kind of risks
80:23
were present then and what kind or No
80:26
okay
80:27
so we know that the risks were higher
80:30
but we don't have information from the
80:33
past to put a number to that risk so we
80:39
now so we can't say what what the risk
80:43
was we can't give you a number for what
80:44
the risk to us in the past going forward
80:47
we are getting the information very good
80:51
information on what's being emitted from
80:53
stereo genex and we'll be able to going
80:55
forward give you a number a current
80:58
number what the risk is but
80:59
unfortunately we can't put a number to
81:01
the pass risks other than to say that we
81:03
do know that they were higher stereo
81:07
genic said that ATSDR used a risk
81:11
criterion that is much lower than the
81:14
laboratories generally can measure does
81:17
that mean ATSDR made a mistake
81:20
ATSDR did not make a mistake ATSDR did
a
81:24
study that said based on some
81:27
preliminary modeling information about
81:29
what we from the primary information
81:31
about what stair genex was emitting and
81:34
we used a model to to estimate what the
81:39
concentrations were around the country
81:41
around the county they they asked the
81:46
question if these levels stay if these
81:49
levels last for years might there be a
81:52
public health issue and that answer was
81:54
yes
81:58
in a press release from the IO I
82:01
Illinois EPA and also as was mentioned
82:05
earlier the EPA stated that the eto
82:09
concentration of the eto risk is 60
82:11
times more than once believed well the
82:15

new assessment and reflect this increase
82:17
in potency and can you described what a
82:19
detailed or refined the risk assessment
82:21
means sure the news the assessment that
82:26
we're gonna do going forward will use
82:28
the new value of toxicity so we'll use
82:31
that value that 60 times more potent
82:32
than the previous one generally how we
82:37
do the work this is how we do the work
82:39
here and this is how we do the work all
82:41
across the country when we do these risk
82:42
assessments is we get the best
82:45
information we can about what's coming
82:47
out of the facility we have a pretty
82:49
good handle on what's coming out of the
82:51
stacks the pullet part of the pollution
82:53
that's being put through the control
82:55
device with a pretty good understanding
82:56
of what is coming in the in the air from
82:58
those stacks there's other emissions
83:01
that are coming out that are coming out
83:03
maybe events or leaks and there was
83:06
escape from the plant oh so we call
83:07
those fugitive emissions and that's what
83:09
when Mike was showing the slide remember
83:12
the slide that had the yellow part and
83:13
that's the part that we are getting
83:17
information on to understand the
83:18
fugitive emissions so once we have the
83:21
handle on all the emissions that are
83:23
coming out of the facility we put those
83:25
emissions into a very powerful model
83:28
that will sort of disperse the emissions
83:33
and provide an understanding of what the
83:36
concentrations are what y'all are
83:38
breathing and then again we couple that
83:40
information with what we know about the
83:42
toxicity and we'll have the risk it's
83:45
going to take a little bit of time to
83:47
understand those fugitive emissions
83:48
we've got to get it right we have to
83:50
follow the science and do
83:51
right so it'll be a couple of months
83:53
before we have all the information we
83:54
need to conduct the assessment once we
83:57
have all the information we need it
83:58

doesn't take that long to conduct the
83:59
assessment and as soon as we're done
84:01
with that assessment we're gonna be will
84:03
let you know let you all know what the
84:04
results are I ready to come back to you
84:06
guys and talk about it okay I've got a
84:10
kind of a multi-part question how much
84:13
background ethylene oxide is in the air
84:16
and is that enough to cause cancer and
84:20
then can you kind of explain what the
84:22
background means take that one we don't
84:27
know as I said before we don't have a
84:29
lot of experience measuring this
84:30
particular chemical we don't have many
84:32
years or very many measurements at all
84:36
of ethylene oxide in Willowbrook or
84:38
anyplace else around the country so in
84:39
terms of what the measured background
84:41
levels are we don't know but we will
84:43
know as a result of the monitoring study
84:45
that we are currently conducting in your
84:47
community and we have other air toxic
84:50
sites around the country we can look and
84:51
gather that same kind of information so
84:54
we can begin to characterize what the
84:56
baseline what the background is that
84:59
companies emit into the air above and
85:02
beyond that background so we don't know
85:04
but we're working to find that out and
85:09
what sources of emissions Creed that
85:12
background noise we don't know that yet
85:16
either that's something we need to look
85:18
at our emissions inventories and see
85:21
what potential sources might be there
85:23
for ethylene oxide but I think we need
85:26
to look to some of our measurements
85:27
first to actually see what the levels
85:30
are away from high emitting facilities
85:39
what is an acceptable or a safe level of
85:42
ethylene oxide so for a chemical like
85:59
ethylene oxide which is one of these air
86:02
toxics that we that we are directed to
86:06
regulate by the Clean Air Act the EPA
86:09
doesn't have a level or a bright line or
86:14
a number that we we put out about a
86:20
level of which below is okay and above
86:23

is not okay it's a little more
86:25
complicated than that we need to do a
86:27
risk assessment to determine what the
86:30
risk is again just like I explained we
86:32
need to understand what chill our
86:33
breathing how toxic it is we put that
86:35
together we have a risk assessment and
86:36
then we look at that risk assessment and
86:39
we look at the results of the risks and
86:40
then we also have to look at actually
86:44
the study that we did we have to look at
86:46
how certain re about those emissions
86:48
that are coming out of the stack even
86:50
with a stack test there's going to be
86:51
some some uncertainty some unknown so
we
86:54
need to take that into consideration we
86:57
also have to look at how certain we are
86:59
about that toxicity value when EPA
87:01
develops a toxicity value and we usually
87:04
develop a toxicity value that is makes
87:08
it so that when we do the risk
87:09
assessment we're overestimating the
87:10
risks not under estimating the risks we
87:12
don't want to underestimate the risks we
87:15
take all that information together and
87:17
then we determine what is safe or what
87:20
it when we turn with the if the
87:22
emissions need to be low or if the
87:24
emissions are low enough and it's a it's
87:26
a process that we do with scientists and
87:29
engineers and people from all over the
87:31
EPA office offices and we bring all that
87:35
information
87:36
together and then the decision is is
87:39
made about whether or not the emissions
87:42
need to be lowered or if they're long
87:43
enough let me just add to it Kelly said
87:48
under the law in our job at EPA is to
87:50
follow the law we do set safe levels for
87:53
some air pollutants ozone smog it's a
87:56
problem here in the summertime right I
87:57
know I lived here for all my life up
88:00
until a few years ago we do set safe
88:02
levels for ozone and particles so we do
88:05
have that authority and we do that under
88:07
the Clean Air Act air toxics part of the

88:09
Clean Air Act works differently we
88:11
regulate based on risk we do not set
88:13
safe levels we regulate based on risks
88:15
as Kelly described so the way the law
88:17
works that we follow the law is a little
88:20
bit different for our toxics than it is
88:21
for other pollutants
88:31
so at what level of risk would you draw
88:35
the line in the sand or does this become
88:38
a negotiation between industry and the
88:42
EPA once you have the data so it's it's
88:52
not a negotiation it's a it's a process
88:56
that is based in science and it's
88:58
directed by the Clean Air Act and it's a
89:01
decision that the EPA makes again in
89:05
concert with our scientists our
89:07
engineers we have a policy group that
89:09
waves in to make sure we're we are
89:12
evaluating the risk correctly according
89:15
to how the Clean Air Act tells us how to
89:17
do it
89:17
we then when we set a regulation we then
89:22
propose the regulation out to the public
89:24
and everybody gets to weigh in on
89:26
whether or not they agree with that
89:29
level whether or not they agree with the
89:31
decision so it's a process that starts
89:35
with the science part that's informed by
89:38
by what the law tells us to do and then
89:41
is a part that a part of it where we put
89:43
that out to the public and the public
89:45
can weigh in and determine and weigh in
89:49
and then we take those public comments
89:50
very seriously and we make the final
89:52
decision
89:57
that is a very good question we when we
90:01
do a rule we have a public comment
90:04
period time and I bet you Laura will
90:06
talk about this in the third panel about
90:08
how to stay involved but we we put the
90:12
decision out for public comment and
90:14
people can write in as long as they as
90:18
long as they want we get a lot of very
90:19
lengthy comments and then we take all
90:22
those comments and we evaluate them and
90:24
we respond to those comments in our

90:26
final decision we also often have a
90:28
public hearing where people can come and
90:32
hear about the rule and and speak and
90:34
weigh in that way too I want to remind
90:39
everybody that the questions that Ursula
90:41
and I are reading have been submitted to
90:44
the EPA so we were volunteered to read
90:48
the questions has there been a study of
90:51
cancer rates in our area from what we
90:55
understand that the state of Illinois
90:57
Public Health Department is pursuing a
91:02
study right now on that I don't have the
91:06
information about when that might be
91:07
done we will get that information to you
91:09
we'll work with with the Department of
91:13
Public Health to get that information
91:15
out with a with an expectation of when
91:18
you guys will have that information is
91:23
it fair to assume that the incidence of
91:25
cancer in Willowbrook is substantially
91:27
and naturally higher than that of the
91:29
rest of the state of Illinois I think
91:31
the answer to that right now is we don't
91:33
know and after the Department of Public
91:35
Health finishes their study I believe
91:38
that there will be a better
91:39
understanding of that that's know anyway
91:44
can at the lane oxide to get into the
91:47
water supply
91:53
yeah so I think bill can answer that one
92:00
well I'll answer just because we got
92:03
that question from someone in the
92:05
Illinois congressional delegation so I
92:06
ended up having to send a letter back in
92:09
response so what we did is consultant
92:11
you know we're all their experts we're
92:13
not water people so we consulted with
92:15
their office of water to ask them if
92:17
they thought there was any reasonable
92:19
possibility that ethylene oxide emitted
92:21
into the air would somehow make it into
92:23
the water and their judgment which we
92:25
sent back in the letter was they don't
92:27
see any way that you know that
92:29
reasonably could occur in any
92:31
significant quantity so they they you

92:33
know the initial assessment of our water
92:35
offices they don't they don't think air
92:37
emissions ultimately should result in
92:39
contamination of water I'm sorry I
92:44
didn't hear that what was the question
92:49
yeah okay glycol so what I don't know so
92:53
this is you know in the category of
92:55
things we don't know completely I don't
92:56
know how much ethylene oxide if any is
92:58
in that glycol and so the answer might
93:00
be if there's no ethylene oxide in the
93:01
glycol zero I suspect there may be a
93:06
little bit of ethylene oxide in that
93:08
glycol because it comes from their
93:09
pollution control device they use glycol
93:11
or it's produced in their pollution
93:12
control devices so if there is some
93:15
there's some possibility of glycolysis
93:17
build that ethylene would make it into
93:19
the soil or into the water but I'm just
93:21
talking about theoretical possibilities
93:23
we don't have hard information on that
93:24
question right now I think what the
93:27
questioner meant was is there ethylene
93:29
glycol in the water supply and that's
93:34
not we don't have the answer tonight and
93:37
we'll work to get that answer to you so
93:40
we only have about five more minutes
93:41
left in this
93:44
is the amount of ethylene dioxide
93:48
emitted into the air enough to cause
93:50
concern for children and their ability
93:53
to learn and function normally I don't
93:59
know if dr. buchanan wants to start that
94:00
answer can you repeat the beginning of
94:09
the question please in the amount is the
94:13
amount of ethylene oxide emitted into
94:17
the air enough to cause concern for
94:20
children I hate to join the cadre of
94:24
people saying we don't know but I have
94:28
looked at the literature on ethylene
94:30
oxide exposures and children and there
94:33
isn't anything so this is an area that
94:36
has not been studied before so I am
94:39
unable to say whether that there are
94:42
definitive studies neurodevelopmental

94:45
problems have not been seen at the low
94:48
doses seen in the area from the
94:52
admissions from stereo geniux so that we
94:54
know of the levels that are that are out
94:58
there now and have been out there for
95:00
the last few years are not related to
95:02
neurodevelopmental outcomes yeah I I
95:07
just don't have there just isn't any
95:09
literature on that it's impossible to
95:11
say if you'll stay a little bit dr.
95:17
Buchanan
95:20
what is the comparative Sept ability of
95:24
children to toxins like ethylene oxide
95:27
compared to adults and how does how does
95:30
that prescribe how you treat this
95:34
contamination so children in general are
95:37
at higher risk because of exposure from
95:40
exposure to environmental toxicants
95:42
because they breathe more rapidly than
95:44
we do and they breathe more air per body
95:47
weight so in general what if there's
95:49
something in the air children are gonna
95:51
get more of it compared to adults they
95:54
also live longer so children have
95:57
obviously have longer lifespans
95:58
so for carcinogens if there are cancers
96:03
that are going to develop that have a
96:05
latency or a delay of 20 30 or 40 years
96:08
from exposure to development of the
96:11
cancer the child has a longer time to
96:14
develop that so people who are obviously
96:17
in their 50s or 60s and are exposed to a
96:19
carcinogen that takes 30 years to
96:21
develop some of those people aren't
96:23
going to be around long enough to have
96:26
the cancer develop but children have a
96:27
full lifetime ahead of them so we
96:29
consider them to be at especially high
96:30
risk from carcinogens
96:34
I think this will be the last question
96:36
for this battle
96:47
okay I will make this one exception man
96:49
but we need to perform I was a senior
96:58
manager for the federal government for
97:01
37 years and talk about roadblocks and
97:04
crap that you had to put up with and

97:06
trying to make an impression was so so
97:08
difficult and I could only imagine under
97:10
the new administration that's even worse
97:12
I have was diagnosed with pancreatic
97:14
cancer in 2015 ironically I was
97:18
transferred to this area in 1989 which
97:22
was one of our little milestones what
97:24
I'm saying to you is right now we've got
97:27
to go somewhere when I needed to have
97:29
something done critically I had to find
97:31
the person that I could talk to not just
97:33
go back to the stats thirty years is a
97:38
long time
97:40
[Applause]
97:44
you saw the people that stood up when
97:47
they'd lost loved ones I have a whole
97:49
community of friends that have cancer
97:50
and we just need we need accountability
97:55
we need to know I need to look at you I
97:58
need to look in your eyes so you'll go
98:00
back and you'll make not not just a
98:04
report but make a difference go to the
98:07
person that can get through all this
98:09
crap I really really ask you this so
98:14
sincerely and God bless every one of you
98:18
[Music]
98:38
thank you ma'am that's nice now we're
98:42
good okay can I get Larry and Steve to
98:45
come on up from the fire department
98:46
we're going to have a quick presentation
98:48
from the fire department I'm going to
98:51
ask you to try to be as expeditious as
98:53
you can and then we'll launch into panel
98:55
two
99:07
so my name is Larry link I am the fire
99:10
prevention director for the Tri State
99:11
Fire Protection District not behalf of
99:14
chief Mullen arrow and our chief
99:15
officers that are here tonight like
99:16
thank you for inviting us to this
99:18
discussion we have a 30-minute
99:21
presentation we have ten minutes so
99:24
we're gonna whip through it okay so we
99:27
covered Aryan Burr Ridge Willowbrook
99:29
Willow Springs and unincorporated DuPage
99:31
County we have 17 firefighters on duty

99:36
plus staff every day we are a Insurance
99:42
Service ISO to rated fire department I
99:45
know that doesn't mean a lot to you but
99:47
it means that we are in the top 3% of
99:50
fire departments nationwide the core
99:55
functions that's not why I said that the
100:02
core function of the fire department's
100:04
there's three basic functions we are
100:07
here to prevent bad things from
100:09
happening we're here to take care of
100:14
problems if people have medical issues
100:16
and if there's a fire any other met kind
100:18
of mishap we're here to handle that
100:22
problem as well I'm going to talk a
100:28
little bit about the fire prevention
100:29
Bureau just so you know what we do and
100:30
how we work with your community and
with
100:35
organizations like stereo genex we have
100:38
eight fire prevention personnel seven
100:41
inspectors that are out on a daily basis
100:44
inspecting one see at least once a year
100:47
every building in the district that does
100:50
business or where people live on top of
100:54
that we are in these buildings for
100:56
re-inspections
100:57
and we also we require that each
101:06
business has their sprinkler system
101:09
tested by an outside agency twice a year
101:11
and we require their fire alarms to be
101:14
tested twice here as well so that's
101:17
people in our business our
101:19
in these buildings pretty often here's
101:23
some ways that we try to prevent
101:25
problems so when a buildings being built
101:27
we review all the plans we review the
101:31
the way the building's built we review
101:33
the exiting will review the fire alarm
101:35
systems the sprinkler systems and we
101:37
make sure that they are up to current
101:38
code we inspect we inspect new
101:43
structures structures prior to their
101:45
opening so Pete's market opened recently
101:48
we're in there making sure that
101:50
everything's safe before the public is
101:52
allowed to go in their new space is when
101:54

they're remodeled we make sure that
101:56
everything's been done properly changes
101:58
in occupancy so if a building one day is
102:01
an office building and the next day
102:03
they're sterilizing equipment we review
102:10
those plans and make sure that whatever
102:11
equipment is in there that's necessary
102:14
to keep them compliant with the code is
102:15
in there we check the fire fire alarm
102:19
systems the sprinkler systems we do our
102:21
annual inspections and REE inspections
102:23
so this year so well from up to
102:27
September we did two thousand five
102:29
hundred and ten inspections two hundred
102:31
and forty one service provider
102:32
inspections that's the people that go in
102:35
from a separate company and check
102:36
systems out and then they report back to
102:39
us and let us know that everything is
102:40
okay we plant we've done 115 plan
102:44
reviews and we've done 319
102:46
investigations training and PubMed
102:47
events one of the things that is
102:51
difficult for us is that there's a bunch
102:54
of regulatory agencies and you can see
102:56
them on here and this isn't everybody
102:58
I mean there's there's more people here
103:00
tonight than this but these are some of
103:02
the regulatory agencies in the area
103:06
here's what we can't regulate and
103:08
there's a lot more things but we have
103:09
nothing to say about it villages whether
103:11
it's Willowbrook or darien or Burr Ridge
103:13
we have nothing to say about their
103:15
zoning laws so if they say something can
103:18
go you know in this property they can do
103:21
it we have nothing to say about
103:23
emissions and we can't determine what
103:26
types of materials can be stored on-site
103:29
not here's what we can do we can make
103:33
sure that the storage of the materials
103:36
let's say ethylene ethylene oxide we can
103:41
make sure that they do not store more
103:43
than the law allows them to store on in
103:46
their facility we can make sure their
103:48
sprinkler systems are working we can
103:50

make sure that they have the proper
103:51
sprinkler system that's designed for
103:53
that material we check their fire alarms
103:58
make sure that they work properly and we
104:00
make sure that they follow all the laws
104:02
that we have adopted in the
104:04
international fire code and the NFPA has
104:07
adopted by the state of Illinois we have
104:10
four stations I'm not going to read you
104:13
everything that's in these stations but
104:15
we have a station in Willowbrook a
104:17
station and dairy in a station and
104:18
Burridge in a station in Willow Springs
104:20
and so from our initial response can
104:23
come any of this equipment here this is
104:28
station two in Darian station three and
104:31
Burridge station four in Willow Springs
104:38
Steve Europe hi my name is lieutenant
104:42
Steve vogelin with the Tri State Fire
104:43
Protection District I am the hands make
104:45
coordinator for our department and as
104:47
you saw the equipment up there we have
104:48
all that equipment we can use however
104:51
what we don't have is our own hazmat
104:53
team there's no suburban department it
104:55
can afford to have their own hazmat team
104:56
the equipment's too expensive the
104:58
training is too extensive so what we do
105:00
is we actually join together with an
105:02
organization called Mavis which is
105:03
mutual aid box alarm system so what
105:06
happens is that that system the whole
105:09
state is broken into different divisions
105:10
so our division is division 10 it's
105:14
about approximately 12 fire departments
105:16
that join together share resources money
105:18
and training so what our division 10
105:20
hazmat team does is we have a
105:23
specialized what we call a squad it
105:25
Pleasant you fire department which is
105:26
right next door to us we do annual and
105:29
monthly training we do recertification
105:32
through the state we're all certified up
105:34
to the tech
105:35
level two it's a lot extra training it's
105:38
a lot of extra time it's all voluntary
105:40

so I just want to let you know that I
105:42
keep getting questions are we ready if
105:44
that anything goes wrong with us I mean
105:46
we don't deal with the long-term cancer
105:48
aspects we deal with will this chemical
105:51
catch fire can it explode can it leak
105:53
can it kill people directly yes all that
105:56
stuff we've all been through that we all
105:57
know that we are trained to deal with
105:59
that we have specialized equipment to
106:01
deal with that so the first thing we
106:03
were doing the scene is we look this
106:05
chemical up in what's called the ERG
106:07
that's kind of like the Bible has Matt
106:09
for the first thing responders all most
106:11
of the really bad chemicals that are out
106:13
there they'll show you something like
106:15
this and it'll give you some basic
106:16
response guides so what we've done is
106:18
we've taken this and other sources out
106:20
there and created an actual incident
106:24
action plan for any of these possible
106:26
incidents that could go wrong at the
106:27
plant so we actually have more in depth
106:29
plans than any of this stuff so this is
106:32
what this would show you here's what
106:33
your initial evacuation plans protect
106:37
that place plans are so we've gone
106:39
already gone through all this stuff so
106:41
now normally on a hazmat when you pull
106:43
up you don't know what you've got you've
106:45
got to figure out what you've got you
106:46
don't know where you're at this we know
106:48
where we're going we know what we have
106:50
we know how much is there and we've
106:51
already done all the sites so we're
106:53
already way ahead of the game in the
106:56
future would be surprised at the head
106:57
and the entire team starts training
106:59
specifically and its chemical since this
107:01
has been such a big issue but I just
107:03
want to let everybody know that yes we
107:05
are prepared even though we're a small
107:06
department this is just some examples to
107:09
the isolation distance I mean I've seen
107:11
this on Facebook and various things that
107:13

have popped up this is basically the
107:15
program to use that tell us we put the
107:16
chemical in we put if it's a large spill
107:19
a small spill we put the weather we put
107:22
wind direction and this gives us some
107:24
basic guide light so and what to do
107:26
initially these are other examples that
107:31
we printed up so just really quickly I
107:34
already went through Mabus Chicago Fire
107:36
Department is part of made this
107:37
Milwaukee Fire Department so all this
107:39
stuff is there for us Mabus is not the
107:41
only resource we have we can also get
107:43
state and county and federal resources
107:46
if we need them through the Emergency
107:48
Response Center so if we call for what's
107:51
called a task force we could even call
107:52
for something that would look like this
107:53
if things get bad enough this is
107:55
normally stuff that you would see a
107:56
tornados earthquakes that kind of thing
107:58
but we can also mobilize this kind of
108:00
equipment for a hazardous material
108:01
incident if it was ever bad enough so
108:05
this is just some more how the state is
108:06
broken down with Mabus this is just some
108:09
example equipment that if we ever would
108:10
need it for whatever reason from Mavis
108:12
that we can mobilize right through our
108:14
dispatch center
108:15
so there's decontamination vehicles
108:18
there's entire vehicles that do nothing
108:20
but bring us air bottles there's some
108:24
incentive supply equipment there's an
108:26
entire tent city we can actually
108:27
mobilize and put an entire one of the
108:30
giant task force we can actually house
108:32
and feed all those guys all those
108:33
personnel if we need it to for whatever
108:35
reason so just for an again these are
108:38
some specialized meters that might come
108:39
into play especially the area array with
108:42
those hours it would be able to detect
108:43
the ethylene oxide and they would be
108:45
unmanned meters that we can put at
108:48
different spots and in our command
108:50

center we can actually get real-time
108:51
readings on those meters and this is a
108:55
typical chemical suit like we would be
108:56
wearing in an event like that again much
108:59
too expensive for any one department but
109:01
we do have access to all of it
109:11
no no no no sir we prepare for every
109:16
chemical this is just one of a list this
109:18
is this is stuff we have eggs to
109:20
everyday this is nothing directly to do
109:22
with this particular chemical or even
109:24
willowbrook this is something that we do
109:26
statewide so we're ready for anything so
109:32
one of the things is we did want to
109:34
alleviate some of the concern whether or
109:36
not we're doing anything to prevent a
109:38
problem at this facility or any of the
109:40
other facilities within the district and
109:42
whether or not we're prepared to handle
109:45
an incident that might happen here or
109:46
anywhere else and we're just kind of
109:48
trying to help you out and make make you
109:51
feel maybe a little bit at ease that we
109:53
are here and we will do our job and
109:55
we're prepared to do it but the last
109:57
thing I want to do and get your pencils
109:59
ready because at the end of this I'm
110:01
going to give you my phone number so
110:05
here's what you can do you could if you
110:07
want to be notified if there's an
110:09
incident at Sturridge annex or any other
110:11
place any place you might want to be
110:13
afraid of you can go to the Tri State
110:15
Fire Department's Twitter account which
110:18
is Tri State FD you can see it there you
110:20
can also see all of this on our website
110:22
so if you go to our website there's a
110:24
there's a notify me button you push that
110:28
you push that you get to this page you
110:31
can also sign up in Willowbrook you can
110:33
sign up on the Nixle website and we have
110:35
a link to all of these sites on our
110:36
website Burridge is also Nixle Nixle
110:41
Darien is uh they're on Twitter Willow
110:44
Springs is a reverse 911 page county is
110:47
on alert again go to our website
110:50

tri-state FD comm and you can click on
110:52
any one of these links and you'll get to
110:57
the place where you need to sign up to
110:59
be notified in your community now what
111:01
we'll do is if there's an incident we
111:04
will put out in real-time messages on
111:07
Twitter that will tell you shelter in
111:11
place
111:11
evacuate stay away from this road
111:13
whatever the K and it won't just be
111:15
Sturridge annex it'll be any incident
111:17
that's one of the things we learned from
111:18
this so you will have real-time in
111:22
information and if you have trouble with
111:24
Twitter just ask your kids cuz that's
111:27
what I did yeah so we do need to wrap
111:33
this up but go ahead quick question I'm
111:42
sorry that's not my decision but with
111:46
the chief address that the question was
111:49
about the glycol spill the question is
111:51
as there was recently in to Whitehall
111:52
spill and would we have notified the
111:55
public about that spill I would just say
111:58
this and pardon me for I guess my
112:01
portion of the presentation got caught
112:03
so I'm the new guy I've been a tri-state
112:05
for 10 months
112:07
welcome to tri-state but you know the
112:11
question was would we have notified
112:13
people about this spill that happened on
112:17
September 1st and the quick answer to
112:20
that is unfortunately we just got this
112:23
up and running in the last two weeks so
112:29
our intention is to notify the public in
112:32
this manner the old manner in which we
112:35
used to do notifications was calling
112:38
that mabus of ironbox getting multiple
112:41
agencies coming and going door-to-door
112:43
that's how we notified people to
112:45
evacuate it's how we notified the
112:48
shelter in place now I'm a I'm like
112:50
Larry my daughter would have to show me
112:53
how to do Twitter and Facebook but this
112:56
is the wave of the future this is what
112:58
we've been told that this is the modern
113:00
way to notify people now that being said
113:03

the people that I earn on Facebook and
113:05
on Twitter we are going to still
113:07
eventually get out there and have to do
113:10
it the old-fashioned way okay so yeah I
113:15
got cut off lastly my name is Larry
113:19
Larry link
113:20
I work in fire prevention and you can
113:23
call my office any day six three zero
113:26
six five four six two eight four and I
113:30
will address any question you have
113:32
not sure if I always know the answer but
113:35
I will try thank you guys really
113:37
appreciate it sighs I miss you a lot
113:39
but we need to get off the paddle to
113:40
think again Malvika and Mike's back up
113:47
the bills back up and our questioners
113:51
for this this panel our Sri Rao and
113:58
john-boy what they're ready to go they
114:04
have their mics and there's mics up
114:06
there take it away
114:08
all right the first question for this
114:11
group is how does the sterilization
114:13
process work that really is behind our
114:23
sculpt in the fire service
114:24
I would hope somebody from EPA could
114:27
actually describe what they're doing in
114:29
the building yeah well I'll tell you I
114:31
went to the facility today I've never
114:33
seen it before so I felt it was
114:35
important to know what it was we were
114:36
talking about so I spent an hour over
114:38
there this afternoon I can tell you what
114:40
I saw I'm no sterilisation expert but
114:44
it's basically a three-part process that
114:45
they have a material interestingly comes
114:49
in on pallets in cardboard boxes what
114:52
they showed me it was medical devices
114:53
like tracheotomy kit that you might use
114:56
in emergency response to you know to
114:58
provide an airway that kind of thing
115:01
like a long catheter they had boxes full
115:03
but it basically but cardboard boxes
115:05
full of medical devices is what I saw on
115:07
wooden pallets that you would like put
115:10
them on it you know load them up and put
115:11
them on a truck wrapped in clear plastic
115:14

wrap they don't even unpack all that so
115:17
they take that they put it in a
115:19
preconditioning room to heat it up and
115:21
raise the humidity so that's important
115:24
for the sterilization to be as effective
115:25
as it can be that's what they explained
115:27
so I'm reporting to you I'm not
115:29
purporting to be an expert
115:30
once they pre conditioned just with heat
115:34
and humidity like a hundred degrees very
115:36
humid
115:37
they take the pallets that put whole
115:39
pallets into the sterilization chamber
115:42
sterilization chamber is a big metal box
115:45
that can hold several pallets in a time
115:47
close the door
115:48
they pull a vacuum on it so pull out all
115:51
of the air and then they sweep it with
115:53
nitrogen a couple times to inert because
115:55
ethylene oxide is very flammable and
115:57
they don't want to create a flammable
115:59
condition and the sterilizer so they
116:00
sweep it with nitrogen and then at that
116:03
point they add the ethylene oxide and
116:06
then they let it sit in that box for a
116:08
period of time for the sterilization to
116:10
occur once they wait that period of time
116:13
they pull the ethylene oxide out of the
116:15
box and then they sweep it with nitrogen
116:17
several more times to get as much of the
116:19
ethylene oxide off this off what they're
116:21
sterilizing before they reopen the this
116:23
chamber then they open up the chamber
116:26
when all that's done transfer the the
116:28
treated material into a what they call
116:32
an aeration room and there they let it
116:35
sit in that room has emissions controls
116:37
on and they let it sit because after
116:39
it's been fumigated there's still some
116:41
ethylene oxide inside the material and
116:43
inside the box they let it sit for a
116:45
period of time so that can come off
116:46
before they actually put it back on the
116:48
trucks and ship it and so when it's
116:50
aerating as they call it they collect
116:52
those emissions and put them through one
116:54

of their emissions control devices so
116:55
that roughly speaking is how they do
116:58
what they do if you need any more
117:01
technical explanation we would have to
117:03
get back to you and that would be happy
117:04
to do that thank you
117:06
are all discharges of eto connected to
117:10
scrubbers at at the stereo Jetix
117:12
facility these would include the main
117:14
vent when the eto is pumped out at the
117:16
sterilization chamber at the end of a
117:18
cycle Andy baxevanis tracked the purging
117:20
of the chamber and fence it was it that
117:23
way in the past
117:25
okay well I'll take that one again since
117:27
I saw it today so there's no ethylene
117:33
oxide until you get to the fumigation
117:35
part so that you know the pretreatment
117:37
thing that I described is just heat and
117:39
humidity they add ethylene oxide in the
117:42
sterilization chambers themselves as I
117:46
described it when there
117:47
after they've let the stuff do its
117:50
fumigation where they suck it out of the
117:53
chamber with with a pump that goes to a
117:55
treatment device and then as I said they
117:58
sweep the chamber with nitrogen to try
118:01
to flush out as much of the free
118:02
ethylene oxide as I can that goes to a
118:05
scrubber and then once they've done all
118:08
that they've got as much out as I can
118:10
they open up the door and that's when
118:12
what they call the back vent is used and
118:14
basically it's a personal protection
118:15
device because somebody's got to go in
118:17
with fork truck and get the stuff out of
118:19
the sterilization sterilization chamber
118:20
so they turn on the vent so there's air
118:23
blowing from the outside into the
118:25
chamber so the person operating the
118:27
forklift isn't exposed to excessive
118:29
amounts of ethylene oxide so it's that's
118:32
what's called the back then and that
118:34
also is tied into a pollution scrubber
118:36
and that's that's the job that they did
118:39
just recently what in July or August of
118:41

this year previously that back then had
118:43
not been tied into a pollution control
118:45
device so now it is and I saw it with my
118:47
own eyes and then as I said you take the
118:50
stuff out put it in the aeration room to
118:53
let it vent off a little bit more in
118:55
that whole room actually they have three
118:57
of them each of those three rooms has a
118:59
scrubber on it so that emissions from
119:02
that don't go out into the environment
119:06
does stereo genex operate 24 hours seven
119:10
days a week and are there certain
119:12
weather patterns or a specific time of
119:14
day when deathly an oxide lingers longer
119:16
in an area that's our understanding it's
119:20
a continuous operation in terms of
119:22
weather patterns certainly during the
119:24
night when the atmosphere is more stable
119:27
and the winds are lighter there could be
119:29
a tendency for pollution levels to be
119:32
higher closer to the facility during the
119:35
daytime you have more mixing and
119:37
generally higher wind so the pollution
119:38
can get dispersed farther away so
119:41
nighttime would probably be the time
119:43
when you might see the higher levels
119:45
what happens to the ethylene glycol does
119:49
it go down the drain to the sewer system
119:50
is this a permanent event can an eto
119:54
spill and enter a sewer drain oh I
119:56
changed that to Canada ethylene glycol
119:59
spill enter a sewer drain thank you so
120:04
first of all as was alluded earlier by
120:07
the stops air jetting spokes it is a
120:09
by-product from the scrubber and they do
120:10
sell it as a product they do have a
120:15
secretary secondary containment in case
120:17
there should be a spill there was one in
120:19
2013 as was also alluded to earlier at
120:22
the beginning the earlier presentation
120:26
they do not have a permit for a
120:28
discharge because that's not
120:30
contemplated they presume that they are
120:32
going to collect it and then sell it as
120:34
a product and when they had the spill in
120:36
2013 that was considered kind of using
120:38

our legal terminology and unpermitted
120:41
discharge so that was why we refer that
120:43
over to the Attorney General's offices a
120:44
part of that lawsuit in 2013 and we've
120:47
got a lot of other questions but there
120:48
are two things that we you didn't get an
120:50
answer in the last panel eyes so I'm
120:52
spent 30 seconds addressing them one
120:54
there was a question out when there was
120:56
when the community should expect the
120:58
cancer cluster study to be concluded and
121:00
we've heard a couple times and testimony
121:04
in Springfield during various
121:05
legislative hearing is that the parts
121:07
Tate Department of Public Health is
121:08
expediting that and they hope to have
121:09
that done in February or beginning of
121:11
March the second question I wanted to
121:13
quickly address I'm sorry for for taking
121:17
off here but the question was should the
121:22
community be concerned about either eto
121:25
or glycol in drinking water and Illinois
121:31
EPA is working with the DuPage County
121:33
Department of Public Health to really
121:35
address that issue and the the County
121:39
Health Department has taken the lead on
121:42
doing the canvassing and I really want
121:43
to spend two seconds on this because
121:45
this is really very very important
121:48
they've reached out by mail they have
121:52
set up a website for people to
121:54
to provide information so that we can
121:57
determine where there are private wells
121:59
so we can do sampling and we need access
122:02
agreements to be able to do sampling at
122:05
these locations we're focusing right now
122:07
on a half-mile radius surrounding the
122:09
Steyr Jennings facility but we're also
122:11
Canada seeing a full mile radius as well
122:14
and the reason why I want to dwell on
122:16
this for a seconds because so far we're
122:18
not getting a lot of response back I
122:21
know the health department's going out
122:22
tomorrow to physically knock on doors
122:25
but we've gotten three access agreements
122:28
within that half mile radius so far and
122:31

44 between the half mile and mile so if
122:36
you if you live in that radius if you
122:39
live in close proximity to the facility
122:41
if you know someone does and they've
122:42
gotten a letter or they've been someone
122:44
left a door hanger on their door ask
122:46
them to reach out to the community
122:47
health department to get us an access
122:49
agreement so we can do that testing
122:51
please it's really very very important
122:54
we want we want to be able to have a
122:56
complete analysis of what's out there so
123:00
sorry history has a well and has not
123:03
received any notification is there
123:05
somebody that they can contact to have
123:07
their well tested absolutely so we're
123:10
working with County Health Department so
123:12
they should certainly reach out to the
123:13
to page County Department of Public
123:15
Health to do so again as I said we're
123:18
focusing on that half mile radius we
123:21
won't hit every private well within the
123:22
half mile and then extend out from there
123:25
I think it was alluded to earlier I
123:28
think bill you touched on this very
123:30
briefly that and Illinois EPA would
123:32
agree we don't expect to see eto or
123:36
glycol in any of the private well
123:38
sampling that we do but that's why we're
123:41
doing it out of an abundance of caution
123:42
to make sure that really is the case
123:46
this question is for chief or inspector
123:49
link is Sturridge annex treated as two
123:55
facilities or as one when it comes to
123:58
enforcing regulations it's two separate
124:00
buildings so it's
124:01
treated as - okay and then director
124:05
Messina does EPA iepa treated as two
124:08
facilities or as one once the the stair
124:12
Jetix facility correct one facility so
124:14
to clarify the fire department treats it
124:16
as two facilities and iepa treats it as
124:19
one facility the the permitting scheme
124:21
that we're that we operate would treat
124:24
it as one the environmental law would
124:26
treat it as one facility the fire
124:29

department has adopted the International
124:31
fire code and the International Fire
124:33
could a lot of things differ depending
124:35
on the size of the building and what's
124:37
being done in the building so we have no
124:41
other choice but to consider it two
124:42
different facilities and I think maybe
124:45
something may be one of the things that
124:47
is is being referred to as because I've
124:49
been asked is is this a loophole to be
124:53
able to store more materials well they
124:56
can't store more materials but it I
124:58
don't know that I'd call it a loophole
125:00
it's two different buildings so we
125:02
inspect them - we inspect them
125:03
differently and they're separate so so
125:10
each building is inspected as a separate
125:12
facility correct that has to meet the
125:14
requirements on an individual basis yes
125:30
has the EPA been monitoring air quality
125:33
says Sturridge annex opened in 1984 and
125:37
is there a record of the air quality
125:39
reports from 1984 till now ear
125:44
measurements for ethylene oxide just
125:46
started a couple of weeks ago that's the
125:49
network site that we started up and I
125:51
think there's a map somewhere around
125:53
here and one of the walls showing the
125:54
locations I had up there earlier tonight
125:57
but no we have not been monitoring for
126:00
ethylene oxide up until just recently is
126:09
is the third party conducting the
126:12
testing owned by Sturridge annex or have
126:16
a financial connection yeah I'm gonna
126:19
elaborate on the last question and then
126:21
I'll ask you to repeat that question so
126:26
a lot of people are unhappy with the
126:28
answer that said we've only just started
126:30
a Mia monitor for Etha and oxide but the
126:33
country is a big place so I just I want
126:36
everyone to understand that you know
126:38
that's not any kind of value judgment on
126:39
Willowbrook or anything more than the
126:42
fact that we regulate hundreds and
126:44
hundreds of different kinds of chemical
126:45
substances we regulate those emissions
126:48

from hundreds and thousands of different
126:50
types of sources as I said earlier from
126:52
steel mills to petroleum refineries to
126:54
ethylene oxide sterilization facilities
126:56
you know as much as we would like to
126:59
spend a lot more money doing what we do
127:00
we do have limited resources and so we
127:03
have to carefully pick the places where
127:06
we spend the money and take the time to
127:07
deploy monitoring networks and we do
127:10
that for the very most important
127:11
pollutants that affect the very most
127:13
people like smog and cities we have
127:16
nationwide monitoring that works soot is
127:20
a widespread problem we have nationwide
127:22
monitoring networks for that you know
127:25
ethylene oxide is very important to the
127:28
Willowbrook community but in in the
127:30
grand scheme is not a compound that's
127:32
used very widely at all across the
127:34
nation so historically that's not
127:37
the kind of chemical we we as a federal
127:39
government would require ambient
127:40
monitoring for because you know because
127:44
it's it's much more limited in its use
127:47
and much more limited in its effect so
127:49
you know that that's why we do what we
127:52
do and you know as Mike said we have
127:55
started you know where we see issues as
127:57
we've seen in Willowbrook then you know
127:59
we will target resources and you use our
128:02
resources to do site-specific monitoring
128:05
and that's that's that's what we started
128:07
to do here and an answer to your
128:09
question it's an independent stack
128:11
testing company no financial ties to the
128:13
company who chose the company I believe
128:19
that the facility would have chosen the
128:23
company however however Illinois EPA and
128:27
u.s. CPA both reviewed the protocol that
128:29
was submitted the protocol must comply
128:32
with the regulations that are set forth
128:34
in the Nisha we both had you at Illinois
128:37
EPA in us CPA as well as representatives
128:39
of village were all present and then the
128:42
stack test was independently reviewed by
128:44

the agency and our stat test experts as
128:46
well as US EPA well we've got a number
128:51
of probably a number of questions about
128:52
the stack test and all that was done
128:54
there because you see you're basing a
128:56
lot of your you're putting a lot of
128:59
weight on what come what's in that stack
129:01
test that the emissions are reported my
129:04
understanding by what the calculations
129:09
on the stack test are okay
129:11
it's self reporting and it's really a
129:14
factor of how much chef Leo oxide went
129:17
in multiplied by what's our emissions
129:20
efficiency there's no monitor up there
129:22
day-in day-out measuring this so the
129:25
stack test results are critical to
129:28
knowing how much is emitted so we have a
129:31
lot of questions about that yeah
129:33
including you know who was the company
129:36
that did it who chose them and why was
129:39
there only a limited
129:40
of witnesses allowed to that that's
129:45
right so let me get my crack and then
129:49
I'll hand it to Mike and you can do the
129:51
third version of this we required a lot
129:54
of stack testing in a lot of places
129:56
every single year it probably happens
129:59
every single day in multiple places
130:00
around the country what we do is we make
130:04
the people do it
130:05
so there's legal obligation and through
130:08
our regulations in this case sturgeon X
130:10
did it because we asked them to we
130:12
didn't have to issue a legal order but
130:13
you know this is a very powerful tool
130:16
that we use across the board across the
130:18
nation because actual measurements of
130:21
pollution are really really important to
130:22
us because that that tells us exactly
130:24
what's being emitted from these
130:25
facilities but we make the companies do
130:27
it so there's nothing inherently wrong
130:30
with that as long as they do it right
130:32
now what we well right
130:37
yeah yeah yeah so but iBooks we're gonna
130:41
that's okay I mean this is a community
130:42

meeting that's well over here so we'll
130:44
get there yeah so thank you
130:46
but you know I'll elaborate on you know
130:50
some of the protections we have because
130:52
even though we make them do it we make
130:54
them do it in a very particular way so
130:55
they have to develop a detailed plan
130:57
that explains exactly how they're gonna
130:59
do the testing they send it to us to
131:01
review and approve before they they take
131:05
the first step once we review and
131:07
approve the plan they're authorized to
131:09
go forward with the testing but we get
131:13
to be there and we being not me I'm not
131:15
a stack testing expert but guys like Ned
131:17
get to be there and then Ned was there
131:20
so you can hear from that if you want to
131:22
hear from the guy himself who saw it
131:23
happen but we do that as a protection to
131:25
make sure that they have a plan they
131:28
reviewed and approved it and then to
131:30
implement the plan we get to look over
131:31
their shoulder to make sure it's done
131:32
right so so this it's a it's a combined
131:36
effort but at the end of the day you
131:38
know it's important to us that the
131:40
people who are emitting are the people
131:41
that have to do this but they have to do
131:42
it in a very very deliberate way
131:45
according to rules that we set and rules
131:48
that we make them follow well since
131:51
they're genex emission tests only
131:53
measured the reduction of the Beckmann
131:55
emissions what plans does the I EPA or
131:59
the US EPA have that determine the total
132:02
ethylene oxide emissions from each plant
132:04
during normal full-scale operations this
132:09
is an ascent
132:12
this is especially significant since
132:15
that building one their separate
132:16
emission sources for sterilisation
132:18
chambers emissions and backfin emissions
132:20
and at building two were all the
132:23
steriliser missions back vent emissions
132:26
and and original emissions are treated
132:28
it by a-1 emissions control system so
132:31

first of all I would agree with
132:32
everything you just said as lead up to
132:34
that question one one point that I think
132:37
is important and then I'll follow up to
132:38
answer your
132:39
question the reason why the test is on
132:44
September 20th and 21st just measured
132:46
that portion from the back benches disk
132:50
we were determining the effectiveness of
132:54
the controls that were in place and the
132:56
construction permit that Illinois EPA
132:58
issued to them in June of this year so
133:00
really that test was limited and you're
133:03
absolutely right it was limited to
133:05
confirm what we thought would happen
133:08
after they installed the venting that we
133:10
authorized via that construction permit
133:13
now the question that you ask is
133:16
absolutely critical about testing the
133:19
facility as a whole and I would
133:21
absolutely agree with you and and this
133:23
is something that we that I personally
133:26
have had conversations with the agency
133:29
has had conversations with the Illinois
133:33
Attorney General's Office and I think
133:35
that's coming sooner rather than later
133:37
it's an important it's important and I
133:39
agree with you what do you think there'd
133:40
be a full-scale Towson fairly soon
133:44
fairly soon and we're just and I'm being
133:47
you know I listen I understand if you
133:49
have a date but we're trying to know day
133:50
and I think that's important and I
133:52
understand why you're asking the
133:53
question because it's important one is
133:54
one of the you know we're looking at a
133:56
lot of different options as a part of
134:00
the enforcement matter that that we've
134:02
sent over to the attorney general's
134:04
office we're working together and it's
134:05
one of those items that is part of those
134:07
discussions that we're having with that
134:08
office and we do need to understand a
134:13
little emissions so we can do an
134:15
accurate risk assessment as I mentioned
134:16
earlier it's the fugitives it's the
134:18

leaks what's coming out of the fence and
134:20
the doors the things that cannot be
134:22
measured with the routine type of stat
134:24
testing that we do we don't have
134:26
standard protocols for capturing and
134:29
measuring those leaks so that's what we
134:31
need to get information on from some of
134:34
our air monitoring and get some of the
134:36
other data collection that's critical in
134:38
us in order for us to characterize the
134:40
fugitives
134:41
know what the total emissions are okay
134:43
one more on that is do you have plans to
134:47
install continuous emissions monitoring
134:50
systems we are not planning to do that
134:55
now well why would you require it I
135:00
guess would be the question so we know
135:01
rather than just you know an
135:06
extrapolation from one stack test times
135:09
the amount of input that's not really an
135:11
accurate measure of the volume that's
135:13
coming out of that building and hasn't
135:15
been for 34 years and you're doing your
135:23
risk assessments based on those numbers
135:26
yeah so when we require someone to do
135:29
emissions control or install emissions
135:31
controls it's really really important to
135:33
us to make sure it's done right most of
135:36
the time we don't require people to
135:38
measure the actual pollution that's
135:40
coming out of the stack because it's
135:41
hard it's very very hard to do it's very
135:43
very expensive in most cases so most of
135:46
the time we assure compliance in other
135:49
ways but in ways that give us confidence
135:51
that it's being done right so for
135:54
instance sometimes in Syria Gen X
135:56
doesn't do this but a simple example is
135:57
sometimes we require people to put an
135:59
incinerator on their missions to burn
136:01
them up make sure they all go away
136:03
well we know if an incinerator is kept
136:05
at a given temperature like 1,400
136:07
degrees or 1500 degrees we're gonna get
136:09
really really good combustion so we
136:11
don't need to measure what's coming out
136:12

of the stack because we know if it's
136:14
1500 degrees we're getting virtually
136:16
total destruction here they don't use it
136:19
they use scrubbers they're a little bit
136:21
more complicated so we look at other
136:22
things like how much are they
136:24
recirculating through the scrubber and
136:25
how much pressure does it take you know
136:28
pressure drop through the scrubber so
136:29
there are things we look at but using
136:31
engineering principles that we pick the
136:33
right things and we make them monitor
136:35
those things then we can be really sure
136:37
that those devices those pollution
136:39
control devices are working really well
136:40
so that so the bottom line is compliance
136:44
assurance is really really important to
136:46
us but that doesn't always mean
136:48
you know measuring at the end of the
136:50
vent we can do it very reliably in other
136:52
ways
136:52
what has changed to make ambition
136:55
controls in the back fence suddenly
136:57

feasible the EPA and the ethylene oxide
137:00
industry removed the rule about
137:02
controlling back months after was
137:03
determined it was too dangerous after
137:06
the explosion in Ontario California so
137:16
as bill said earlier we established
137:18
emission standards under the Clean Air
137:20
Act for a number of different industrial
137:21
source categories commercial sterilizers
137:23
being one of them in 1994 EPA
137:26
established the first rule for this
137:28
sector for commercial sterilizers few
137:31
years after that we learned about the
137:33
explosion issue and we were very
137:35
concerned from a public safety
137:36
standpoint about that at that time we
137:40
did not realize ethylene oxide was as
137:42
potent as we know it to be today so when
137:46
we went through and amended the rule in
137:48
2001 and then did a risk assessment in
137:51
2006 we had a potency value that was 60
137:55
times less than what we know it to be
137:57
today well we did that risk assessment
137:59

in 2006 it showed that there was not
138:02
going to be a problem in terms of public
138:05
exposure to ethylene oxide levels
138:07
without controls on the back of an
138:09
uncontrolled back the missions based on
138:12
this toxicity value we had at the time
138:14
now we know that is not the right number
138:17
that it is 60 times more potent so as we
138:20
are going through a review of that rule
138:22
which is Bill mentioned earlier we
138:24
started recently and should have a
138:26
post-op next year that you all can
138:29
comment on we will be using as kelly
138:31
said earlier we will be using that new
138:33
potency value I think the science has
138:36
change and have taken that into account
138:37
I think the questions more of a safety
138:40
question as since the thought was that
138:43
the explosion previously happened due to
138:46
the back vent issue that they had is the
138:49
technology on back venting scrubbing
138:51
changed so that to lower the risk or as
138:54
the decision made that the risk of
138:56
explosion is
138:58
worse than the it's not as bad as the
139:00
risk of giving cancer yeah our rule did
139:03
not specify a certain type of control
139:05
technology some of the in the industry
139:08
used scrubbers others used thermal
139:10
oxidizers it was the thermal oxidizers
139:12
the thermal heat treatment with this
139:14
very volatile chemical that presented
139:16
the public health safety issue
139:18
we established a rule that was not
139:21
specific to technology it was a general
139:24
rule for the industry if I can add in in
139:27
California that was largely in part due
139:32
to operator error
139:34
somebody bypassed safety devices because
139:37
there was a problem with the machine
139:39
they also we're Sturridge annexes in
139:43
here
139:43
they have monitoring systems that they
139:46
didn't have there so yes some things are
139:49
better so we do need to wrap up this
139:51
panel another question or do yep given
139:55

the reason spill in Delaware do believe
139:57
sperrit genic should have told the
139:58
community about the emissions of October
140:00
2013 and glycol spill in 2013 as well as
140:04
the recent one in September of this year
140:07
2018 I can say that stair genex should
140:14
notify us when there's a spill under
140:16
facility and again we're in conversation
140:19
with them about that and one of the
140:23
things we learned from this whole
140:25
process from all you people telling us
140:27
you know what's important to you in
140:28
what's going on that's kind of why we
140:31
started this whole notification system
140:35
so whatever we know we are gonna pass
140:38
along to the publican and if it's just
140:40
you know if it's just a small something
140:42
we'll say it's just a small something
140:43
but we're hopeful that stair genex will
140:47
include us a little quicker and some of
140:50
this information the one thing that you
140:54
know we don't want to sugarcoat things
140:55
for people they're not they're not
140:58
required to report to us there's no like
141:02
there's a fire alarm system in this
141:04
building that goes to a Central Station
141:06
somewhere else and we get a call there's
141:09
no system like that
141:11
their monitoring system doesn't notify
141:13
us that there's a problem oh I
141:16
understand chief my question was
141:18
directed more towards the APA it's okay
141:24
about the the notification board yes
141:26
right so you know right now the existing
141:29
state law requires this make certain
141:30
notifications but I think you're right
141:32
you know it's one of those items that
141:34
the the public notice component is
141:36
lacking and some other reasons we've
141:38
draft and let you know legislation to
141:40
address that issue and feel fully
141:42
comfortable that that's something that
141:43
should be done better needs to be done
141:45
better
141:45
didn't you oppose that legislation last
141:47
week no no no last week there was
141:51

notification there's there's a whole
141:53
bill that did a lot of things let me be
141:54
very clear absolutely supportive of
141:56
public notice absolutely opposed the
142:00
bill well there was why did the why was
142:04
governor rauner and Sarah genex notified
142:07
in December 2017 about the cancer risk
142:10
by stereo genex and the public was not
142:13
informed at that time and I've got a
142:15
second question and I won't have time
142:16
for it but the same question was asked
142:18
as to why were the facilities up north
142:22
in Waukegan and in Kearny not notified a
142:26
lot of that question let me start with
142:29
the notification to the state of
142:31
Illinois so as EPA develops its national
142:34
air toxins through assessment we work
142:35
very closely with our state partners to
142:37
review and quality assurance
142:40
we generated some draft information very
142:43
early on that we were sharing with
142:44
States they were reviewing that it took
142:47
several months to work through that
142:48
process but it was a very orderly it was
142:50
a very scientific process or to make
142:52
sure that we had the data right and that
142:54
was the information that we released in
142:56
August of this year who made the
142:58
determination the stealth spirit tells
142:59
Sturridge annex in December as we work
143:04
through and gather that information and
143:06
review that information we work closely
143:08
with our state partners we work with the
143:10
facilities they're the ones who report
143:12
self-report in many cases that
143:14
information to the state agencies we
143:17
need to verify that information with the
143:19
state
143:20
with the reporting facilities to make
143:21
sure that we got their numbers right did
143:25
still didn't answer the question at the
143:26
state notified stereo tenex or did the
143:28
US EPA I'm not aware of us working
143:35
directly with stereo genex in that
143:36
timeframe
143:39
it's absolutely my understanding that as
143:42

as you noted that u.s. CPA was reaching
143:44
out to those facilities to to ensure
143:47
that the inventory you add was complete
143:51
or to identify the gaps that you had
143:52
that's that's always been my
143:54
understanding so to answer your question
143:56
specifically Illinois EPA did not notify
143:58
have any notification or any discussions
144:01
with Sara technics at that time about
144:03
the review that u.s. CPA was doing no I
144:11
said one last question okay good
144:13
director was Sina you were banned from
144:15
issuing pollution permits under the
144:17
Clean Water Act do your lobbying
144:19
activities before taking your current
144:20
position when it became evident that
144:22
there was a possible water pop pollution
144:24
issue from ethylene glycol weeks should
144:27
be recused herself so first of all both
144:31
during the time that you're referencing
144:33
and after that time is concluded I've
144:35
never issued reviewed or weighed in on
144:38
any and PDS permit that we've issued so
144:41
I understand the question is just not a
144:43
role of the director's office since I've
144:46
had it or previous directors the
144:49
directors don't weigh in on permitting
144:51
decisions okay thank you gentlemen very
144:56
much can we quickly get I think Laura's
144:58
coming on up and let's move on to panel
145:02
three let's take about 15 minutes for
145:05
this panel there's only a few questions
145:07
leave some time for panel four and you
145:11
know if we need if we need to go five or
145:12
ten minutes after
145:13
we will we will do that so our panel
145:19
three questioners I what are the EPA
145:25
plans moving forward and how can the
145:28
community steady involved okay I think
145:32
some of you guys have already heard this
145:34
alluded to but we intend to have some
145:36
ongoing dialogue with this community
145:39
moving forward and making a lot of the
145:42
same materials available to other
145:44
communities so as Mike mentioned we're
145:47
going to have a webinar as the data
145:50

comes in to walk you through that data
145:53
and help you understand the information
145:57
that's coming from the monitoring we
145:59
also want to give some webinars on
146:02
overviews of the national air toxic
146:04
assessment a little bit more detail our
146:07
regulatory process and other issues that
146:10
come up and with the idea being that
146:12
when the we're ready to make decisions
146:15
on the regulatory process and propose
146:17
any regs you have the background that
146:19
you need to be able to comment on those
146:22
rules and engage on them in a productive
146:25
way as possible and so in that process
146:29
there was a question about how do we
146:31
comment and we'll go through that
146:34
there's there's ways of doing written
146:37
submittals there's ways of doing verbal
146:39
submittals and we'll walk through that
146:40
process as well is the EPA planning on
146:45
setting regulation for eto as bill and
146:50
Mike mentioned we're already in the
146:52
process of doing that with this
146:53
collecting the data not only here from
146:56
stereo genex but from facilities across
147:00
the country and using that information
147:03
and the detailed information that we're
147:05
developing that's the first step in that
147:07
regulatory process and we are moving
147:10
forward to do that and I believe it was
147:13
mentioned that we want to propose that
147:15
this year what is the expected time
147:19
frame for the regulation to be set so
147:22
we're working on it coming up you know
147:24
proposed working through the
147:26
working on proposal this year and then
147:28
the comment period happens and then we
147:31
will finalize the role so just to
147:38
clarify it so we've had a rule in place
147:40
for this sector for almost 25 years and
147:42
we've reviewed it a couple of times
147:44
already the Clean Air Act requires us
147:46
every eight years to relook at our
147:48
mission standards do we do it every
147:50
eight years sometimes not sometimes
147:52
we're late when the last week this for
147:55

this particular sector was done in 2006
147:57
that means were four years late so we're
148:01
2013 remember and we plan to propose the
148:04
rule next year probably middle of next
148:06
year and in 2016 you reclassified
148:09
ethylene oxide as a class 1 carcinogen
148:12
correct yes assessment that was done as
148:16
bill talked about earlier done by our
148:18
office research and development did
148:20
identify this and this regulation that
148:25
you're updating was not done until what
148:28
happened at ste regenexx occurred last
148:30
summer right the update we're doing
148:34
we'll take that the new update we're
148:36
doing we'll take that information into
148:37
account did you start this update before
148:40
the ATSDR report went out this year no
148:43
we're starting we started that work in
148:45
September after we released our national
148:48
air toxics assessment when ATR released
148:51
their report our response to that as
148:53
bill described earlier is two-pronged
148:55
there's a regulatory approach we're
148:57
taking to provide solutions under the
149:01
Clean Air Act but also this case by case
149:03
review that we're doing for sea regenexx
149:05
and several other facilities around the
149:07
country to get reductions sooner because
149:10
the regulatory process as he said could
149:12
takes months years you can't wait months
149:15
in here's you want action now we want to
149:17
explore five years that's why we're
149:18
doing this review the KPI is a case by
149:20
case review so do these regulations also
149:24
deal with handling ethylene oxide as
149:27
well as emissions deal with the handling
149:31
of ethylene oxide as well as emissions
149:33
rule
149:34
we have deal with the air emissions
149:36
related to ethylene oxide and is the EPA
149:39
taking into account propylene oxide as
149:41
well as ethylene oxide don't know the
149:46
answer and is there an updated risk
149:54
assessment report that's due in 2019
150:00
you mean our national assessment as bill
150:02
said we are not required under the law
150:04

to do that we do that because
150:07
communities states want information and
150:10
we want to understand what the risks are
150:13
we regulate air toxics differently under
150:15
the Clean Air Act we regulate based on
150:17
risks not on safe levels or air
150:19
standards like we have for other
150:21
pollutants but based on risks so we do
150:24
this national assessment to health areas
150:25
understand what the potential risks are
150:28
in their communities so are we gonna do
150:30
this again in three years that's
150:33
generally the schedule we've been on I
150:35
cannot promise that it comes out of my
150:37
office but it is something we've already
150:39
started we just finished the last review
150:41
that came out in August we've already
150:43
begun the next one and we'll try to get
150:45
it out by 2019 let me add to that just a
150:49
little bit we we develop our national
150:52
emissions inventory which is the
150:53
starting point for the native every
150:55
three years for the criteria pollutants
150:58
that's required every three years for
151:00
the criteria pollutants and the toxics
151:02
gets added to that so when we do Nate we
151:06
use that information as a starting point
151:08
and we build from that and that's why
151:10
typically we do that in the NATO
151:13
assessment around every three years we
151:15
can three or four years so that it gives
151:17
us the the new set of data to start with
151:21
that be 2021 2019 I misspoke I want to
151:26
talk a little bit about the trans
151:28
2-butene issue that has come up recently
151:31
so let me just hold all this a second I
151:34
think we've spelled into that last
151:35
session is that correct this is this is
151:38
that session three
151:39
well my first question was we did the
151:42
first the first first few were that
151:45
session I just wanna let you know
151:46
everybody is available to answer these
151:48
questions so it's not just the folks
151:50
that's all go ahead what was the purpose
151:55
of publicizing the potential
151:57

interference of trans 2-butene on the
152:00
ear testing so it was new information
152:04
for us and theirs and we wanted to be
152:06
transparent with y'all to make sure that
152:09
you are aware of the new information
152:12
when we had it you know we've heard from
152:15
the community members that you wanted to
152:19
be kept informed as we had that
152:21
information and so we wanted to make
152:23
sure when we had certainty about it we
152:26
had certainty and how the labs were
152:29
going to handle kept quantifying the
152:32
ethylene oxide and the trans 2-butene
152:35
that we let you guys know about that as
152:38
soon as we as we could does this
152:41
potential interference invalidate the
152:44
ATSDR report as dirigen exclaims no as
152:49
Kelly mentioned earlier that was a
152:52
snapshot in time based on the data that
152:55
they had at the time using the screening
152:58
level emission or the draft emissions
153:00
information and a grab sample using that
153:05
old data and as Kelly mentioned that
153:08
report gave if that planet continued to
153:13
operate at that level then then there
153:15
was a health concern and the
153:17
recommendations from ATSDR were to
153:19
reduce emissions and move forward with a
153:22
regulatory process and that's exactly
153:24
what we've been doing based on that
153:26
report so their report was not wrong and
153:30
what it did to what what the the
153:33
interference issue did tell us is that
153:36
we need to account for that to make sure
153:39
that we're giving a cue more accurate
153:40
information for future assessment
153:46
so the potential say something to that
153:49
right so mark Johnson with atsdr's so we
153:53
issued our report in August of last year
153:56
of this past summer based on both the
154:00
modeling and the measured levels of
154:02
ethylene oxide in the community given
154:06
the uncertainty about the interference
154:07
which still is uncertain whether it was
154:09
actually interfered with or not we are
154:11
going to plant to make a slight revision
154:13

in our document to reflect that our
154:15
assessment is going to be based on the
154:17
modeling information which confirms the
154:20
results of the testing and we believe
154:23
our conclusions recommendations are
154:25
still supported but we want to be clear
154:27
about that as so that this interference
154:30
issue does not change our opinion in any
154:33
way were there any detectable levels of
154:39
trans-2-butene in the original ambient
154:41
air testing of May 2018 we did not
154:48
analyze for trans 2-butene at that time
154:50
as I said before measurements for this
154:53
particular chemical ethylene oxide has
154:55
been very challenging and we don't have
154:57
a lot of experience with it so as we've
154:59
done further research as science has
155:01
become available that's information we
155:04
wanted to share with people so we were
155:06
naughty we did not quantify it back in
155:09
May but we will be quantifying it going
155:11
forward with the new measurements we're
155:13
collecting so were the news reports then
155:16
based on pure speculation I don't want
155:21
to comment on necessarily the news
155:23
reports we were just trying to provide a
155:24
statement and share as Laura said just a
155:27
minute ago we wanted to be completely
155:28
transparent with you and share with you
155:30
the latest information we had about the
155:33
science of measuring for this particular
155:35
chemical well there are recent news
155:38
reports that said that the EPA gave an
155:40
all-clear
155:41
are those accurate that was not the
155:44
statement that we issued and where did
155:47
the EPA learn of this possible
155:49
interference from
155:50
hell we learned it from our scientists
155:53
as we were starting to get experience
155:56
with measuring ethylene oxide we were
155:58
actually talking with our laboratory
156:00
about how they did the analysis and
156:02
determined that there was this possible
156:05
interference and that we needed to be
156:06
more careful as we did the analysis in
156:09

the laboratory so that we were purely
156:12
and and strictly identifying the
156:15
ethylene oxide levels and not possibly
156:18
looking at other chemicals and when did
156:21
the EPA learn this just very recently
156:23
which is why we just issued the
156:25
statement last week
156:27
how recent is very recently I don't know
156:31
the exact date but we've been looking at
156:35
the laboratory technique as I said
156:38
before we don't have a lot of experience
156:40
measuring this chemical and as we were
156:42
preparing to take these measurements in
156:45
working with our laboratory we wanted to
156:47
make sure that we were getting accurate
156:48
and reliable information
157:00
did folks hear that he said within the
157:02
last two or three weeks
157:04
was it the EPA's intent to state that
157:07
due to this potential interference there
157:09
is no cause for concern we did not say
157:13
that and and we are here tonight because
157:16
we think there still is a potential
157:18
concern and as bill said very clearly
157:20
earlier we are committed to making sure
157:22
that we find a solution for this
157:24
community okay thank you if I can ask
157:27
Ned a question you were present for the
157:36
staff testing in September at stair
157:37
genex right yes
157:39
and did you understood the way the
157:43
facility ran how many chambers that had
157:45
and what its cycles were within reason
157:49
so the way the test was designed was to
157:52
test each back vent at a time so each
157:54
test was one back vent emission process
157:56
do you know how many chambers stair
157:59
genex runs at any given time I do not
158:03
have that information and how many
158:06
chambers were run at the time of the
158:08
staff test at the time the stack fit but
158:10
once again each run each test run was
158:12
one back vent emission so one chamber
158:15
being vented so they could be running
158:18
all of their chambers on a 24/7 basis
158:21
but you only test it for one chamber I
158:23

would not want to speculate that I do
158:25
not know what their standard procedure
158:26
is but you tested one chamber but we
158:29
tested one chamber at a time and why is
158:33
that that that's how the test plan was
158:36
designed and approved by but why why why
158:41
didn't why didn't you have them running
158:43
like they're normal given day when
158:45
you're testing the stacks
158:48
[Applause]
158:55
that's a difficult question to answer
158:58
I believe the test plan was was built
159:01
designed similar to how the subpart o
159:03
was designed which allows one cycle
159:06
event out of one chamber to be is
159:09
basically a test run so the bank event
159:13
emissions want ardent or as as you've
159:15
brought it before aren't incorporated in
159:16
the sub part so this is something that's
159:18
completely separate from the from from
159:21
the sub part so in working with Illinois
159:24
EPA we designed to test matter in a test
159:26
method our test test program that we
159:28
thought would effectively challenge the
159:30
removal efficiency of the scrubber
159:32
device one thing to think about when we
159:35
talk about these scrubbers just because
159:36
you inject more material doesn't
159:38
necessarily make it a harder harder test
159:41
to run in many cases and as perhaps in
159:44
this one injecting a lower concentration
159:45
actually made it more difficult to show
159:47
the removal efficiency who prepared the
159:50
test plan the facility and did any of
159:56
this have to do with their construction
159:57
permit did there was a requirement to do
160:02
to connect to the sack test that was a
160:04
condition of the construction permit and
160:05
do the construction permit allow them to
160:07
just test one chamber running fair
160:11
question I don't know the answer to the
160:13
to the construction permit detail happy
160:16
to get that for you though so I
160:17
apologize well just as a follow-up I
160:21
mean from our looking at this when the
160:24
tests when the stack test was done it
160:27

was done with one empty chamber using
160:29
approximately 30 pounds of ethylene
160:31
oxide
160:32
when stereo genex actual production is 5
160:35
chambers that would use 400 pounds if
160:38
they were full would that impact those
160:40
final results I mean it I understand
160:42
what that just said that you can
160:44
potentially get a different result from
160:45
a lower amount would it have changed the
160:48
result potentially I don't think he's
160:51
listening yeah
160:55
question for Ned I can do it a little
161:02
more quickly since you weren't aware of
161:04
how many chambers they have or how much
161:05
they process we can fill that in for you
161:09
as far as we know the stack testing was
161:11
done with you guys with one empty
161:13
chamber using approximately 30 pounds of
161:16
EO when their actual production his five
161:20
chambers that would use 400 pounds if
161:22
they were full with that effect those
161:25
final results Oh actually for the test
161:28
method they prefer thee for the test
161:30
runs for the background emission they
161:31
were using a full chamber so it wasn't
161:33
an empty chamber
161:34
for the back fat testing as far as for
161:37
the design of the test we I'm not sure
161:41
why it was approved that way did you go
161:46
back to them and asked once they give me
161:48
you their test plan you don't go back to
161:50
them and ask them the reason for why
161:53
they chose made the decisions that they
161:55
made Oh
161:56
once again this kind of speaks to
161:57
Illinois it was Illinois's decision
161:59
since this this test was not part of a
162:02
subpart so he did not design the test
162:04
program for back vent emissions there
162:06
was back and forth in the approval
162:08
process so I wish I could answer that
162:10
question but that's all the way up to
162:12
the Illinois EPA and there so Lauren
162:16
obvious that in review the the testing
162:18
protocol but I know that you have my
162:20

email address if you put those questions
162:22
together I'll respond to all of them I
162:24
apologize but I mean I think they're two
162:27
points to be made here one you know I
162:28
think that the testing for the occur up
162:31
September 24 21st was was narrow in
162:34
scope it was to determine the efficacy
162:35
of the back fence in the venting that
162:39
was that was installed pursuant to that
162:41
construction permit and this goes to
162:43
your question 15 minutes ago
162:45
and that is that needs to be there has
162:49
to be a site-wide more global more broad
162:52
test beyond just that narrow scope from
162:56
what occurred on the September 22 21st
162:59
so what are you gonna do to make that
163:01
change
163:02
I already addressed that we're actually
163:04
in talks that has to happen it will
163:07
happen
163:10
sorry when I hope well those are the
163:14
conversations were having with the
163:16
Attorney General's Office so it needs to
163:18
happen sooner rather than later I just
163:19
don't want to commit because it's not
163:21
just my decision
163:26
so um um so a general question then sort
163:32
of related to that and bringing in
163:33
another element the risk assessment from
163:38
2014 was based on I believe self
163:42
reporting from stare genex that they
163:43
were releasing in 2014 five thousand
163:46
five hundred and sixty six pounds of
163:49
ethylene oxide under your current permit
163:54
regulations they could be emitting up to
163:56
thirty six thousand four hundred pounds
163:58
a year if they chose to do that legally
164:00
they could do that based on what you
164:01
guys allow them to do so of all that
164:04
we're talking about today involves much
164:06
lower amounts than what you allow them
164:09
to do who's to say that once you leave
164:11
town and your air testing monitors are
164:13
gone they're not going to ramp up and
164:15
how do we know that I mean is anyone
164:17
extrapolating that to see what that
164:18

actually means for this community should
164:20
they decide to ramp up so there are two
164:25
components that question both the both
164:28
of them are important so the reason that
164:30
you're referencing the number that you
164:33
reference is that that is when we permit
164:35
facilities they generally fall into
164:37
various categories a cap source is a
164:40
larger source and so they have to be in
164:43
a certain threshold so you're right they
164:44
are allowed even though they've never
164:46
come close to that that that point but
164:49
they are allowed to not since 1999 right
164:52
so but they don't know now I do think
164:55
that one of the things that we're
164:58
actually taking a look at and this is
165:01
because there are enforcement
165:04
discussions going on I want to be
165:06
careful about what I say that we're
165:08
talking about what I don't because we
165:10
obviously with the attorney general's
165:11
office we don't to leave any option
165:15
uncovered in terms of moving for we want
165:17
to look at all of our possible legal
165:18
avenues and I think that's exactly one
165:20
of the things that we're talking about I
165:21
think it's a great point I agree with
165:23
you so why haven't the US EPA or the
165:28
Illinois EPA shuts Terrigen X down so
165:35
I'll speak to Illinois EPA and then you
165:38
can address the federal piece of that so
165:41
as as the facility currently operates
165:43
today it is in compliance with the niche
165:47
at the national mission standard for
165:49
that hazardous air pollutant and the
165:51
permit conditions now as mr. worm
165:55
led off right at the beginning things
165:57
have changed and that was the basis that
166:00
that increased risk factor which we
166:02
don't regulate based on risk we rely on
166:04
US EPA to adopt those regulations and
166:07
then we use them ourselves like most
166:10
states do subpart o I believe however
166:14
because of that increased risk that was
166:16
the basis for our referral to the
166:18
attorney general's office and we're
166:19

taking a look at all of the legal
166:20
options that we have and and from EPA's
166:24
perspective you know the Clean Air Act
166:26
gives us a range of tools to address
166:28
emissions from facilities we have one
166:31
tool in the Clean Air Act to be able to
166:34
address imminent and substantial
166:36
endangerment
166:38
but it's not a perfect tool for this
166:40
situation and so shutting down a
166:43
facility is a very high hurdle to be
166:46
able to kind of move that way so it's
166:49
something that that is there but it's
166:52
really not a great fit for this and
166:55
other situations there are other reasons
166:57
we use imminent substantial endangerment
167:00
but for shutting down facilities it's a
167:02
it's a very difficult process so turning
167:07
a little bit one of the concerns our
167:09
community has that you saw at the
167:11
beginning is that you know it does seem
167:13
like there's and I'll just use the term
167:15
revolving door between people who work
167:17
at the EPA lobbyists is back and forth
167:20
and there's a lack of trust
167:22
and I'm not taking a cheap shot this is
167:25
a genuine question to mr. Wareham you
167:28
know you're being held up so high as the
167:31
top air person in the United States
167:34
looking at your bio prior to this job
167:37
you worked as a lawyer and a lobbyist on
167:40
behalf of major industrial companies and
167:42
advocated according to some
167:44
interpretations at least for looser
167:46
environmental regulations King I would
167:49
like you or anyone to explain to us how
167:53
it does that how do we process that as
167:56
human beings and people who are impacted
167:58
by this toxin in our air how do we trust
168:01
you yeah it's a good question yes if
168:06
somebody said good question is a good
168:08
question
168:09
I came to EPA because I wanted to not
168:11
because anybody made me I came to EPA
168:14
because I have a firm commitment to air
168:17
pollution control and protecting public
168:19

health in the environment I was a lawyer
168:21
in private practice you know between the
168:23
time I left the agency you know I was
168:26
with the EPA from 2001 to 2007 then left
168:30
was back in private practice and then
168:32
rejoined EPA a little bit more than a
168:34
year ago right now so my job right now
168:37
is to be the top federal air regulator
168:39
and I take that job very very seriously
168:42
and I think it's important to know you
168:47
know I have a large and talented and
168:49
very dedicated and skilled staff that
168:51
work with me and you've seen some of
168:53
those people here you're seeing some of
168:55
those people now and I think it's really
168:57
important for all of you to know that
168:59
well I have a lot of influence on what
169:01
the air you know the air program does
169:04
the people who really keep the machine
169:06
running or the people that you see here
169:08
sitting and standing around me and thank
169:11
you we have very little time left ok I
169:14
have a question for dr. Buchanan
169:20
mutagen what does that mean
169:23
something that causes mutations in cells
169:27
and is ETO a mutagen I think so thank
169:33
you you you're not you don't know if
169:36
ethylene oxide
169:37
I know ethylene oxide is a known
169:39
carcinogen and mutation is one of the
169:42
first steps to cancer developing and let
169:46
me ask you doctor what level of eto is
169:49
safe well the general understanding of
169:54
carcinogens is that you can develop
169:56
cancer at any level of exposure so would
170:00
you agree that no level of eto is safe I
170:02
would agree that no levels
170:14
[Applause]
170:15
one of the things that we continue to
170:18
hear from Sarah genex and from lobbyists
170:21
at the ACC and ima is that ethylene
170:24
oxide is produced naturally by our
170:26
bodies and by decaying fruit and other
170:29
sources how does a industrial single
170:33
source emitter of this magnitude of
170:37
ethylene oxide compare to that type of
170:39

emission from the human body or other
170:42
natural sources
170:45
this is Kelly I can take that we humans
170:51
do make some ethylene oxide I know that
170:55
there was a study that stair genex put
170:57
on I think on their website that said we
171:00
didn't make 19 thousand times more than
171:02
what the limit is we have we've obtained
171:06
that study and we have our scientists
171:08
reviewing it and once they're done
171:10
reviewing it will put our view up of
171:13
that will let you guys know what it is
171:15
but we do emit some Evelynn arcing from
171:18
our bodies but that's not but what we're
171:23
studying is what's coming out of stereo
171:24
genex so there's kind of two things
171:27
going on is that does that make sense it
171:29
says and I would also I would be
171:30
interested in dr. Buchanan's answer in
171:32
the clinical setting on that question if
171:35
you know one of the things we heard at
171:38
the first forum from Mark Johnson was
171:40
you know tell your physicians that this
171:42
is going on and many of us have told our
171:46
physicians and they're like what what
171:48
didn't you I don't know what that is
171:49
and so then when the reporting that's
171:53
out there is so magnified and these
171:56
tales about you know basically we're
171:58
giving ourselves cancer by breathing ETO
172:00
to ourselves you know it creates a
172:03
difficult situation for us to talk to
172:04
our physicians in a clinical setting
172:06
when they're being fed information like
172:08
that so I'm curious dr. buchanan what
172:10
your take on that is both the issue of
172:13
natural production of ethylene oxide by
172:15
the human body but also in a clinical
172:19
setting how are every parent every
172:21
person in this room how are we supposed
172:22
to be talking to our doctors about this
172:24
well as a
172:26
my position for almost a decade I can
172:30
guarantee you that the vast majority of
172:32
physicians do not receive any training
172:34
in exposure to environmental counter
172:36

chemicals I mean absolutely not in
172:38
medical schools so that's a problem so
172:41
most of the doctor your personal
172:43
physicians that you go to are not going
172:45
to know about this that's it's a reason
172:48
that the Health Department the county
172:51
health department here organized the
172:53
lecture last night in steel Hospital so
172:56
dr. Johnson and I gave a presentation on
172:58
ethylene oxide to really try to help the
173:01
physicians respond to your questions so
173:04
that's something we are trying to remedy
173:07
that's also one of the reasons that the
173:11
EPA in East TSD our fund of these
173:13
children's environmental health centers
173:15
in each region we have a hotline because
173:18
they recognize that physicians can't
173:20
answer these questions don't have enough
173:22
background and so we have centers of
173:25
excellence in each region and we are the
173:28
center of excellence in the Midwest for
173:30
doctors in residents but primarily for
173:33
physicians to be able to call us and get
173:35
advice on how to talk to patients now
173:37
the second part of your question what
173:41
was it it was about doctors not knowing
173:43
it was the question about the human
173:46
production of ethylene oxide versus
173:48
industrial that is not something that is
173:50
generally known I mean is this generally
173:53
accepted and it doesn't appear in the in
173:56
the deep literature on environmental
173:58
exposures and animal exposures it just
174:00
doesn't come up so I would I tend to
174:04
I've looked at that study too that the
174:07
EPA scientists are analyzing now and I
174:10
tried to look up some of the references
174:11
and got a little lost in the detail I
174:14
have to admit so thank God the EPA
174:16
actually has some experts that are going
174:19
to be able to look at it but from from
174:21
my my impression right now is that that
174:24
is not a significant source of ethylene
174:26
oxide in the human body I mean compared
174:28
to the emissions from stereo Jennings
174:30
and dr. Buchanan where can people work
174:34

in some of the residents go to
174:35
tested for ethylene oxide what type of
174:39
blood test can they take there is a
174:41
urine test and a blood test I would not
174:44
know where that is done hospitals I
174:47
doubt that hospitals do this type of
174:50
test I haven't looked it up but I I can
174:52
I'm pretty sure that this is not
174:55
something that a routine lab would be
174:56
able to do we are not generally
174:59
recommending testing for ethylene oxide
175:02
because as you've heard over and over
175:05
tonight so little is known about this
175:07
chemical there is no known level that
175:12
has a meaning that we can interpret so
175:14
if something comes out comes back a
175:16
hundred micrograms per deciliter I
175:19
wouldn't know what that meant compared
175:21
to somebody whose comes whose a level is
175:24
one one microgram per deciliter I don't
175:27
what does that mean it's a carcinogen
175:29
the longer you're exposed to it the more
175:31
you're exposed to the higher your risk
175:33
of cancer becomes so for a question for
175:37
all of you does that mean that
175:39
Willowbrook and the surrounding
175:40
facilities are the test subjects for all
175:42
of these studies that are going to be
175:45
taken place for children for adults for
175:49
exposure for long term I don't think I
175:54
can answer that I think what I could we
175:57
will do I can the answer is absolutely
176:00
not we're we're looking into ethylene
176:03
oxide in many communities in the country
176:06
including a little drug and we're going
176:08
to get a good understanding of what is
176:11
in the air and let you guys know your
176:13
risk is what your risk is and we're
176:15
going to be coming back and talking to
176:16
you about it or else it we're gonna can
176:24
I ask one last question cuz I think it's
176:25
relevant to what the community wants to
176:26
know about the detection instruments
176:28
it's a quick one I think if you come on
176:36
up and work with the questioners that
176:38
they can add
176:39

present few but it is 10 o'clock I'm
176:42
sorry so well for other questioners you
176:48
go ahead ask them you have a question
176:50
ask a question we have to want to hear
176:54
your question excuse me I develop them
177:08
to start with just adult onset asthma
177:12
three years after we moved in in 1990
177:17
daughter Betty had cancer I eventually
177:21
got more and more multi systemic
177:23
problems I eventually was referred
177:28
through four layers of types of doctors
177:31
to mitochondrial disease expert
177:35
there weren't any in Illinois I had to
177:37
go out of pocket to go to Massachusetts
177:38
General Hospital I've been taking with
177:42
Qadam mitochondria contrail disease
177:46
cocktail for many years now very
177:50
expensive no insurance covers in
177:53
Illinois the only state that covers it
177:55
is Massachusetts it's a big burden
177:59
financially on the family I happen to be
178:03
able to pursue things more because I was
178:05
autodidactic and I used to be
178:06
intelligent before all this happened
178:10
everybody wouldn't have the resources to
178:12
be able to afford these supplements
178:15
especially high cost our large dosages
178:18
of coq10 but it gets very specific and I
178:22
couldn't afford to keep following up on
178:24
it there is most likely a lot more
178:27
people would have something like this
178:29
and be most likely undiagnosed because
178:32
the average family physicians are not
178:35
aware of this many people as they
178:39
continue to get more and more
178:42
multi-systemic
178:46
problems it's been spreads through the
178:50
through the systems depending on which
178:52
organs use the most oxygen this is a
178:57
burden because it can been considered a
179:00
rare disease they're finding out more
179:02
about it but I know that it was brought
179:07
up that the ethylene oxide was a mutagen
179:13
and could cause chromosome changes and
179:16
this is exactly what this is so I just
179:20
want to bring that out to make people
179:21

aware of it thank you
179:25
[Applause]
179:30
just going over time if there's one more
179:34
question you want to ask and then we'll
179:35
wrap us a couple really quick ones um
179:38
the first is that it's been mentioned
179:39
several times that the amount of
179:42
ethylene oxide that you would like to be
179:44
able to measure is not able to be
179:46
captured at such low amounts by the
179:48
current technology that exists what is
179:51
being done to develop that technology
179:53
what is a time frame on that are we in a
179:55
holding pattern as it being worked on
179:57
and if you could answer kind of quickly
179:59
because I have one other question after
180:00
this as we said we're just learning
180:05
we're learning how to measure this
180:06
compound we haven't been doing this that
180:08
long we do have multiple research
180:10
efforts using a number of different
180:12
techniques some optical can you hear me
180:15
okay hold it a little closer okay all
180:18
right so we're trying to evaluate a
180:19
number of different techniques that
180:21
would give us the ability to read down
180:22
at those lower levels at those levels at
180:24
point O two micrograms per meter is our
180:26
target
180:26
but that's we're at the start right now
180:29
I once again this is research I do not
180:31
know how long it'll take but I can tell
180:33
you that we are on it and we are trying
180:35
to find a way and then there's some
180:40
literature from 2002 from the US EPA
180:44
entitled replacing ethylene ethylene
180:46
oxide and another chemical basically
180:50
saying environmental best practices for
180:52
healthcare facilities would it be the
180:54
position of the EPA today that if there
180:56
wasn't all
180:57
turn ative method to ethylene oxide you
181:00
would support that replacement and why
181:03
in 2002 was this something that was
181:05
being promulgated or disseminated by US
181:07
EPA and it's is it still something that
181:10

you're looking into or this is over you
181:13
know says I can't even even know how
181:15
many years ago at this point where does
181:16
that stand yeah I think we got a
181:18
previous question earlier tonight about
181:20
substitute approaches other technologies
181:23
that could be used at something we're
181:24
gonna have to look into but my question
181:26
is about the position of the EPA if that
181:30
were to exist in 2002 there is an actual
181:33
paper document that is created by the US
181:36
EPA consider taking the hospitals for a
181:39
healthy environment pledge find out more
181:42
in 2002 that was something that was done
181:45
by your organization or your agency
181:48
excuse me is that what's the status of
181:51
that position I think to actually see
181:53
what you are looking at I don't have
181:54
that I'd like to see that and we are
181:58
looking at the rule for commercial
182:00
sterilizers we will also look at the
182:01
rule for hospital sterilizers so thank
182:04
you for sharing this but knowing that
182:05
ethylene oxide is a carcinogen if there
182:08
was a replacement method that worked
182:12
just as well would they eat with the US
182:14
EPA support the use of that would
182:16
environmentally speaking and from an
182:18
environmental protection standpoint is
182:20
that something that you guys would want
182:22
to see take over that market I think we
182:26
will want to look at that as part of
182:28
reviewing the rule for both commercial
182:30
sterilizers and hospital sterilized so
182:32
you can't stand here and say a
182:34
representation for the US EPA that if
182:36
there was a better method that didn't
182:38
put a carcinogen into the air that the
182:40
Environmental Protection Agency is a
182:42
general statement hypothetically that
182:44
you guys would not support that being
182:46
used instead of a carcinogen are you
182:48
saying you cannot stand there and say
182:49
that that would certainly be a very
182:51
strong factor in us reviewing and
182:53
possibly changing our rule yes
182:58

okay if you just wait one sec I want
183:03
everybody to if if you haven't signed up
183:06
for gen general information you can you
183:09
can ask at that web address there eto
183:12
and epa.gov you can get put on to the to
183:15
the mailing list and make sure you stay
183:16
in touch and this is the website where
183:18
EPA will be posting all of the
183:20
information you can link from there I
183:21
just want to thank everybody for your
183:23
patience and your civility tonight I'm
183:25
gonna hand it off to Bill just to close
183:28
out I'll be quick thank you for being
183:31
here guys you heard me say it several
183:33
times tonight this is a community
183:34
meeting and I really appreciate your
183:36
input your reaction your comments we're
183:39
in the middle of a process we'll keep
183:41
pushing forward and we will be back
183:42
thank you very much for being here
183:45
[Applause]
183:56
you
English (auto-generated)
Up next

Message

From: Millett, John [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C067CAA6C93544F78C26AB08CC567D27-MILLETT, JOHN]
Sent: 10/29/2018 3:18:27 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; DeLuca, Isabel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b021c30cbee4637a7c7ca683e5e044a-IDELUCA]
Subject: Chi Trib

From Sunday -- http://www.chicagotribune.com/news/local/breaking/ct-met-sterigenics-early-warning-hidden-from-public-20181025-story.html

w/ Link to R5's Dec 2017 letter to the company w/ cc to IEPA.

~~~~~~~~~~~~~~~~~~

John Millett
Director, OAR Communications
Desk: 202-564-2903
Cell: 202-510-1822
~~~~~~~~~~~~~~~~~~

Message

From: Millett, John [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C067CAA6C93544F78C26AB08CC567D27-MILLETT, JOHN]
Sent: 10/29/2018 1:32:21 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: FW: Lisa Madigan: Rauner's office hid health dangers of Willowbrook Sterigenics plant for months

Fyi --

From: Grantham, Nancy
Sent: Saturday, October 27, 2018 4:46 PM
To: Davis, Alison <Davis.Alison@epa.gov>; Millett, John <Millett.John@epa.gov>; DeLuca, Isabel <DeLuca.Isabel@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>
Subject: Fwd: Lisa Madigan: Rauner's office hid health dangers of Willowbrook Sterigenics plant for months

Sent from my iPhone

Begin forwarded message:

> **From:** "Rowan, Anne" <rowan.anne@epa.gov>
> **Date:** October 27, 2018 at 4:30:24 PM EDT
> **To:** "Konkus, John" <konkus.john@epa.gov>, "Grantham, Nancy" <Grantham.Nancy@epa.gov>, "Kelley, Jeff" <kelley.jeff@epa.gov>
> **Subject: Fwd: Lisa Madigan: Rauner's office hid health dangers of Willowbrook Sterigenics plant for months**
>
> Sent from my iPhone
>
> Begin forwarded
>
> > https://abc7chicago.com/health/lisa-madigan-rauners-office-hid-health-dangers-of-willowbrook-sterigenics-plant-for-months/4561426/
> >
> > Sent from my iPhone

Message

From: Bremer, Kristen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B7AD6F4A11064EF08CB03AEC9DC8E892-KBREMER]
Sent: 10/23/2018 8:53:50 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Subject: RE: Sterigenics Willowbrook concerns

Hi Josh,

Deliberative Process / Ex. 5

Let me know if you need anything else, and I'll get back to you on DuPage County's participation in the planning meetings. Thanks!

Kristen Bremer
Policy Analysis & Communications
U.S. EPA, Office of Air Quality Planning & Standards
Email: bremer.kristen@epa.gov
Phone: 919.541.9424
Cell: 919.321.7652

From: Lewis, Josh
Sent: Tuesday, October 23, 2018 4:11 PM
To: Bremer, Kristen <Bremer.Kristen@epa.gov>
Cc: Davis, Alison <Davis.Alison@epa.gov>; Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: Sterigenics Willowbrook concerns

Any update on the talking points?

Also – we received a call on our main line from Tom Cuculich from DuPage County, who's asking the status of the public meeting. Can you confirmed whether you have a DuPage county rep on the group that's meeting weekly to discuss the 11/29 meeting? **Deliberative Process / Ex. 5**

From: Lewis, Josh
Sent: Thursday, October 18, 2018 4:50 PM
To: Bremer, Kristen <Bremer.Kristen@epa.gov>
Cc: Davis, Alison <Davis.Alison@epa.gov>
Subject: Re: Sterigenics Willowbrook concerns

Thanks

On Oct 18, 2018, at 4:48 PM, Bremer, Kristen <Bremer.Kristen@epa.gov> wrote:

Deliberative Process / Ex. 5

Kristen Bremer
Policy Analysis & Communications
U.S. EPA, Office of Air Quality Planning & Standards
Email: bremer.kristen@epa.gov
Phone: 919.541.9424
Cell: 919.321.7652

From: Lewis, Josh
Sent: Thursday, October 18, 2018 4:46 PM
To: Bremer, Kristen <Bremer.Kristen@epa.gov>
Subject: Re: Sterigenics Willowbrook concerns

Deliberative Process / Ex. 5

On Oct 18, 2018, at 4:20 PM, Bremer, Kristen <Bremer.Kristen@epa.gov> wrote:

Thanks, Josh. These have been added to the tracker.

Kristen Bremer
Policy Analysis & Communications
U.S. EPA, Office of Air Quality Planning & Standards
Email: bremer.kristen@epa.gov
Phone: 919.541.9424
Cell: 919.321.7652

From: Lewis, Josh
Sent: Thursday, October 18, 2018 12:49 PM
To: Bremer, Kristen <Bremer.Kristen@epa.gov>
Subject: FW: Sterigenics Willowbrook concerns

Email 2 of 2.

From: **Personal Address / Ex. 6**
Sent: Tuesday, October 16, 2018 3:21 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>

Cc: Wheeler, Andrew <wheeler.andrew@epa.gov>; stepp.cathy@epa.com
Subject: Sterigenics Willowbrook concerns

Dear Josh Lewis,

I am contacting you regarding the Sterigenics plant in Willowbrook, IL that continues to operate and release ethylene oxide (a class 1 carcinogenics) into a densely populated area with several schools, daycares and residential homes that are within a 1 mile circle of the facility. The letter issued by the Department of Health & Human Services (Agency for Toxic Substances and Disease Registry, Region 5) on July 26, 2018 evaluating the cancer risk of the area surrounding the Sterigenics facility in Willowbrook, IL is attached. The ATSDR concludes that "if measured and modeled data represent typical EtO ambient concentrations in ambient air, an elevated cancer risk exists for residents and off-site workers in the Willowbrook community surrounding the Sterigenics facility. These elevated risks present a public health hazard to these populations."

As a concerned resident of Burr Ridge, I am requesting you take immediate action to advocate for the affected citizens of Willowbrook/ Burr Ridge. I am aware that the company installed additional pollution control (scrubbers on the back vents) in July 2018 and performed a stack test in September 2018. Unfortunately, the (attached) preliminary report released by Sterigenics showed only concentrations, but no total annual releases, and hence the data in there cannot be used to model the total cancer risk. (I.e. it only shows the density of EtO as a fraction of the total gas emitted, but since we don't know the value of the total gas emitted, we cannot calculate the total release rates of EtO). The company committed to releasing a complete report "soon" (verbatim from the attached letter) (or at least within 2 weeks or so from the date of the release of the preliminary report). This data was supposed to be utilized by the US EPA to conduct another modeling study to re-evaluate the cancer risk in the area. Can you provide any update on this task?

In the meantime, why does US EPA not temporarily shut down this facility until the risk has been properly evaluated? Why I understand that some medical equipment does require EO sterilization, and alternative processes such as gamma rays or hydrogen peroxide sterilization are not suitable for medical product, there is absolutely NO reason to have such a facility in a highly populated area. Please also keep in mind that EO is dangerous at ambient concentrations BELOW the current detection limit, hence further ambient air sampling is not beneficial. It's the long term exposure that causes the harm, and some people have been exposed to this chemical for 34 years by now.

Finally, as a chemical engineer myself I did some "back-of-the-envelope" calculations using values from the attached ATSDR letter. Table 4 in this report shows the calculation of the cancer risk assuming an ambient concentration of 2.1 ug/m3 (highest value measured in a residential neighborhood). Now the company installed scrubbers on the back vents and claims a reduction of the emission by 90%. If we now assume this residential concentration is 90% less (~ 0.21 ug/m3) we can recalculate that cancer risk. With this new concentration the cancer risk is 6.4E-4 for the 33 years of operation. If the company remains operational, people will eventually get the full 78 years lifetime risk of 9.98E-4. Both of these cancer

risk values exceed the U.S. EPA's decision-making cancer risk range of 1.0×10^{-6} to 1.0×10^{-4}.

It is time that the EPA takes some action to protect our citizens and in particular our children! Three meetings that were scheduled by the US EPA region 5 to discuss this issue were canceled by Cathy Stepp without much pre-notice and obvious reason.

Thank you for any update and action in advance.

Best Regards

Janine Lichtenberger

Message

From: Janine Lichtenberger Personal Email / Ex. 6
Sent: 10/16/2018 7:21:29 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: Wheeler, Andrew [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=17a1669ef5b54fba8cb457845308787e-Wheeler, An]; stepp.cathy@epa.com
Subject: Sterigenics Willowbrook concerns
Attachments: Sterigenics_International_Inc-508.pdf; IL+EPA+Letter+-+Stack+Test+Results+-+27+Sept+2018.pdf

Dear Josh Lewis,

I am contacting you regarding the Sterigenics plant in Willowbrook, IL that continues to operate and release ethylene oxide (a class 1 carcinogenics) into a densely populated area with several schools, daycares and residential homes that are within a 1 mile circle of the facility. The letter issued by the Department of Health & Human Services (Agency for Toxic Substances and Disease Registry, Region 5) on July 26, 2018 evaluating the cancer risk of the area surrounding the Sterigenics facility in Willowbrook, IL is attached. The ATSDR concludes that "if measured and modeled data represent typical EtO ambient concentrations in ambient air, an elevated cancer risk exists for residents and off-site workers in the Willowbrook community surrounding the Sterigenics facility. These elevated risks present a public health hazard to these populations."

As a concerned resident of Burr Ridge, I am requesting you take immediate action to advocate for the affected citizens of Willowbrook/ Burr Ridge. I am aware that the company installed additional pollution control (scrubbers on the back vents) in July 2018 and performed a stack test in September 2018. Unfortunately, the (attached) preliminary report released by Sterigenics showed only concentrations, but no total annual releases, and hence the data in there cannot be used to model the total cancer risk. (I.e. it only shows the density of EtO as a fraction of the total gas emitted, but since we don't know the value of the total gas emitted, we cannot calculate the total release rates of EtO). The company committed to releasing a complete report "soon" (verbatim from the attached letter) (or at least within 2 weeks or so from the date of the release of the preliminary report). This data was supposed to be utilized by the US EPA to conduct another modeling study to re-evaluate the cancer risk in the area. Can you provide any update on this task?

In the meantime, why does US EPA not temporarily shut down this facility until the risk has been properly evaluated? Why I understand that some medical equipment does require EO sterilization, and alternative processes such as gamma rays or hydrogen peroxide sterilization are not suitable for medical product, there is absolutely NO reason to have such a facility in a highly populated area. Please also keep in mind that EO is dangerous at ambient concentrations BELOW the current detection limit, hence further ambient air sampling is not beneficial. It's the long term exposure that causes the harm, and some people have been exposed to this chemical for 34 years by now.

Finally, as a chemical engineer myself I did some "back-of-the-envelope" calculations using values from the attached ATSDR letter. Table 4 in this report shows the calculation of the cancer risk assuming an ambient concentration of 2.1 ug/m3 (highest value measured in a residential neighborhood). Now the company installed scrubbers on the back vents and claims a reduction of the emission by 90%. If we now assume this residential concentration is 90% less (~ 0.21 ug/m3) we can recalculate that cancer risk. With this new concentration the cancer risk is 6.4E-4 for the 33 years of operation. If the company remains operational, people will eventually get the full 78 years lifetime risk of 9.98E-4. Both of these cancer risk values exceed the U.S. EPA's decision-making cancer risk range of 1.0×10^{-6} to 1.0×10^{-4}.

It is time that the EPA takes some action to protect our citizens and in particular our children! Three meetings that were scheduled by the US EPA region 5 to discuss this issue were canceled by Cathy Stepp without much pre-notice and obvious reason.

Thank you for any update and action in advance.

Best Regards

Janine Lichtenberger

DANIEL LIPINSKI
3RD DISTRICT, ILLINOIS
www.lipinski.house.gov

2346 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-1303
(202) 225-5701
(202) 225-1012 FAX
TOLL FREE FROM IL (888) 822-5701

Congress of the United States
House of Representatives
Washington, DC 20515-1303

COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE

COMMITTEE ON SCIENCE, SPACE, AND TECHNOLOGY
RESEARCH AND TECHNOLOGY, RANKING MEMBER

September 21, 2018

The Honorable Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20004

Dear Acting Administrator Wheeler:

I am writing to express concern about the potential public health threats resulting from ethylene oxide (EtO) emissions at the Sterigenics facility at 7775 S. Quincy St. and 830 Midway Drive in Willowbrook, IL (hereafter "the facility"). As you are likely aware, there has been significant public outcry following the August 21 release of a report by the U.S. Agency for Toxic Substances and Disease Registry (ATSDR) evaluating the potential health impacts of EtO emissions from the facility.

According to the ATSDR report, which was based on U.S. Environmental Protection Agency (USEPA) air sampling data collected in May of this year, the estimated increased cancer risk due to EtO exposure in the residential areas surrounding the facility is 6.4 cases per 1,000 people. The estimated increased cancer risk to workers in close proximity to the facility is 2.1 cases per 1,000 people. While these estimates are based on limited data and the full extent of the public health threat is not yet clear, potentially serious consequences warrant decisive action.

Our understanding of the carcinogenicity of EtO has advanced significantly in recent years, and as a result, in 2016, the USEPA increased its estimated cancer risk for EtO by a factor of 30 over its previous estimate from 1985. However, the facility's most recent operating permit (Illinois Environmental Protection Agency Clean Air Act Permit Program Permit Number 95120085) was issued on June 8, 2015, prior to the release of the most recent carcinogenicity estimate, and therefore does not take the updated risk assessment into account. Although all available evidence suggests that the facility is fully in compliance with its permit, I am concerned that the permit conditions do not guarantee an adequate level of public health protection.

While the facility voluntarily made improvements to its pollution control system in July of this year, a step which is likely to reduce ambient air concentrations of EtO in the surrounding area, the results of this change are not yet known. Testing of the upgraded system taking place on September 20-21, 2018, will yield more information on emissions from the facility but may not be sufficient to demonstrate that nearby communities are no longer at risk. In order to more

6245 SOUTH ARCHER AVENUE
CHICAGO, IL 60638
(312) 886-0481
(773) 767-8395 FAX

5210 WEST 95TH STREET #104
OAK LAWN, IL 60453
(708) 424-0853
(708) 424-1855 FAX

222 EAST 9TH STREET #109
LOCKPORT, IL 60441
(815) 838-1990
(815) 838-1993 FAX

14700 SOUTH RAVINIA AVENUE
ORLAND PARK, IL 60462
(708) 403-4379
(708) 403-5963 FAX

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conclusively assess the current exposure risk to the residents of Willowbrook, I urge you to move swiftly to conduct another round of ambient air testing, similar to what was done in May of this year. It is reasonable for the community to expect that the EPA does this type of testing to protect their health.

In absence of conclusive data showing that EtO emissions from the facility no longer pose a public health threat, I request that you take immediate legal action to halt operations at the facility as you are empowered to do under Section 303 of the Clean Air Act. That section allows you to take action to stop the emission of air pollutants at a source "presenting an imminent and substantial endangerment to public health or welfare, or the environment." Following such action, I request that your Agency, in coordination with the Illinois Environmental Protection Agency, review and revise the facility's permit in light of USEPA's most recent Integrated Risk Information System assessments of the health risks posed by EtO. I further request that the facility not be allowed to resume operations until and unless it is possible to do so without posing a substantial public health threat to the surrounding area. In the interest of rebuilding public confidence in the environmental health and safety of the facility, I encourage you to consider requiring regular monitoring of airborne EtO concentrations at the facility's fenceline and the timely public release of monitoring results to the public.

Please inform me as to how you plan to proceed on this issue by contacting Joel Creswell in my office at 202-225-5701 or joel.creswell@mail.house.gov.

Sincerely,

Daniel W. Lipinski
Member of Congress

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 9/27/2018 3:38:09 PM
To: Lyons, Troy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=15e4881c95044ab49c6c35a0f5eef67e-Lyons, Troy]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: Draft response to letters
Attachments: EtO Willowbrook response Draft 7.OAQPS bw.docx

Deliberative Process / Ex. 5

Clint Woods
Deputy Assistant Administrator
Office of Air and Radiation, U.S. EPA
202.564.6562

From: Woods, Clint
Sent: Thursday, September 27, 2018 11:19 AM
To: Lyons, Troy <lyons.troy@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Draft response to letters

Deliberative Process / Ex. 5

Clint Woods
Deputy Assistant Administrator
Office of Air and Radiation, U.S. EPA
202.564.6562

From: Lyons, Troy
Sent: Thursday, September 27, 2018 11:14 AM
To: Woods, Clint <woods.clint@epa.gov>
Subject: RE: Draft response to letters

Deliberative Process / Ex. 5

Message

From: Haman, Patricia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0EBB27CD881D41B19A30A491DC3F3F57-PHAMAN]
Sent: 9/27/2018 3:26:40 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]
Subject: FINAL EtO Willowbrook response w AMBIENT
Attachments: FINAL EtO Willowbrook response w AMBIENT.docx

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 9/27/2018 3:11:17 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: FW: draft letter EtO Willowbrook
Attachments: EtO Willowbrook response Draft 7.OAQPS.docx

Clint Woods
Deputy Assistant Administrator
Office of Air and Radiation, U.S. EPA
202.564.6562

From: Davis, Alison
Sent: Thursday, September 27, 2018 11:10 AM
To: Woods, Clint <woods.clint@epa.gov>
Cc: DeLuca, Isabel <DeLuca.Isabel@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Millett, John <Millett.John@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>
Subject: RE: draft letter EtO Willowbrook

Deliberative Process / Ex. 5

From: Woods, Clint
Sent: Thursday, September 27, 2018 10:28 AM
To: Davis, Alison <Davis.Alison@epa.gov>
Cc: DeLuca, Isabel <DeLuca.Isabel@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Millett, John <Millett.John@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>
Subject: RE: draft letter EtO Willowbrook

All,

Deliberative Process / Ex. 5

Clint Woods
Deputy Assistant Administrator
Office of Air and Radiation, U.S. EPA
202.564.6562

From: Woods, Clint
Sent: Wednesday, September 26, 2018 5:47 PM
To: Davis, Alison <Davis.Alison@epa.gov>
Cc: DeLuca, Isabel <DeLuca.Isabel@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Millett, John <Millett.John@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>
Subject: Re: draft letter EtO Willowbrook

Deliberative Process / Ex. 5

On Sep 26, 2018, at 5:32 PM, Davis, Alison <Davis.Alison@epa.gov> wrote:

Here you go. Let us know if you have questions

From: Woods, Clint
Sent: Wednesday, September 26, 2018 5:27 PM
To: Davis, Alison <Davis.Alison@epa.gov>
Cc: DeLuca, Isabel <DeLuca.Isabel@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Millett, John <Millett.John@epa.gov>
Subject: Re: draft letter EtO Willowbrook

Deliberative Process / Ex. 5

On Sep 26, 2018, at 2:11 PM, Davis, Alison <Davis.Alison@epa.gov> wrote:

Deliberative Process / Ex. 5

From: DeLuca, Isabel
Sent: Wednesday, September 26, 2018 2:06 PM
To: Woods, Clint <woods.Clint@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Millett, John <Millett.John@epa.gov>
Subject: draft letter EtO Willowbrook
Importance: High

Hi Clint and team,

Deliberative Process / Ex. 5

Thanks,
Isabel

Isabel DeLuca
Office of Air and Radiation, US EPA

(202) 343-9247

<EtO Willowbrook response Draft 4..docx>

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397
BRUCE RAUNER, GOVERNOR ALEC MESSINA, DIRECTOR

September 25, 2018

Andrew R. Wheeler
Acting Administrator
United States Environmental Protection Agency
Office of the Administrator
Mail Code 1101A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Sterigenics US LLC
Illinois Clean Air Act Permit Program Permit No. 95120085

Dear Administrator Wheeler:

The Illinois Environmental Protection Agency (Illinois EPA) is very interested in the content and recommendations found in the Letter Health Consultation (ATSDR Letter) issued by the Agency for Toxic Substances and Disease Registry (ATSDR), dated August 21, 2018. The public health problems for the citizens of Willowbrook as expressed in the ATSDR Letter are of the highest concern to Governor Bruce Rauner and the Illinois EPA. We are committed to working closely with state and federal authorities to do what we can to explore the exact scope of the problem and to find meaningful options for resolution.

The conclusions in the ATSDR Letter were based on certain assumptions which ATSDR acknowledged were framed by the information and data provided by the United States Environmental Protection Agency (USEPA). To that end, among the recommendations listed in the ATSDR Letter is that USEPA work with Sterigenics to initiate long-term air monitoring as soon as possible. Such monitoring would measure ambient air levels of ethylene oxide (EtO) and could demonstrate the effectiveness of actions taken by Sterigenics to reduce emissions and subsequent exposures in Willowbrook.

Given the qualified nature of ATSDR's conclusions, we agree with ATSDR that ambient air monitoring would be the best means to gain an accurate understanding of the EtO emissions and their impact on the community. Therefore, we join in ATSDR's request and **demand that USEPA undertake ongoing ambient air monitoring to measure the air levels of EtO originating from the Sterigenics facility**. This must happen and this must happen now for the citizens of Willowbrook and surrounding communities.

Cordially,

Alec Messina
Director

4302 N. Main St., Rockford, IL 61103 (815)987-7760
595 S. State, Elgin, IL 60123 (847)608-3131
2125 S. First St., Champaign, IL 61820 (217)278-5800
2009 Mall St., Collinsville, IL 62234 (618)346-5120
9511 Harrison St., Des Plaines, IL 60016 (847)294-4000
412 SW Washington St., Suite D, Peoria, IL 61602 (309)671-3022
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200
100 W. Randolph, Suite 4-500, Chicago, IL 60601

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Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 8/24/2018 2:18:01 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: Live!!

Clint: We set up a link on our National EtO website (https://www.epa.gov/hazardous-air-pollutants-ethylene-oxide) under Related Links (lower right-hand corner) to Information for Willowbrook, IL, Sterigenics facility. All it shows is the data and the ATSDR letter. Deliberative Process / Ex. 5

From: Woods, Clint
Sent: Friday, August 24, 2018 10:13 AM
To: Koerber, Mike <Koerber.Mike@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Live!!

Mike,

Deliberative Process / Ex. 5

Clint Woods
Deputy Assistant Administrator
Office of Air and Radiation, U.S. EPA
202.564.6562

From: Koerber, Mike
Sent: Friday, August 24, 2018 9:12 AM
To: Woods, Clint <woods.clint@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Live!!

Deliberative Process / Ex. 5

Mike

From: Koerber, Mike
Sent: Wednesday, August 22, 2018 4:40 PM
To: Woods, Clint <woods.Clint@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Live!!

FYI – Region 6 has had the following web site in place since the last NATA went out. It has been a valuable source of information for the community.

https://www.epa.gov/la/laplace-louisiana-health-information

From: Woods, Clint
Sent: Wednesday, August 22, 2018 3:04 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Re: Live!!

Deliberative Process / Ex. 5

On Aug 22, 2018, at 3:02 PM, Koerber, Mike <Koerber.Mike@epa.gov> wrote:

> In case you haven't heard, the NATA and ethylene oxide web sites went live about an hour ago:
>
> https://www.epa.gov/national-air-toxics-assessment
>
> https://www.epa.gov/hazardous-air-pollutants-ethylene-oxide
>
> Also, about the same time, Region 5 went live with their Sterigenics web site:
>
> https://www.epa.gov/il/sterigenics-willowbrook-facility
>
> Thank you, Clint, with helping to get this done!
>
> Mike

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 10/4/2018 3:18:33 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Dominguez, Alexander [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5ced433b4ef54171864ed98a36cb7a5f-Dominguez,]
Subject: FW: Senators Durbin and Duckworth
Attachments: Eto and WIllowbrook.Draft briefing paper for Administrator. 10.3.18.docx

Meant to cc you both – Thanks!

From: Woods, Clint
Sent: Thursday, October 4, 2018 11:12 AM
To: Lyons, Troy <lyons.troy@epa.gov>; Stepp, Cathy <stepp.cathy@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>
Cc: Jackson, Ryan <jackson.ryan@epa.gov>; Molina, Michael <molina.michael@epa.gov>; Palich, Christian <palich.christian@epa.gov>; Frye, Tony (Robert) <frye.robert@epa.gov>; Morgan, Ashley <morgan.ashley@epa.gov>
Subject: RE: Senators Durbin and Duckworth

Troy,

Deliberative Process / Ex. 5

Thanks!

Clint Woods
Deputy Assistant Administrator
Office of Air and Radiation, U.S. EPA
202.564.6562

From: Lyons, Troy
Sent: Wednesday, October 3, 2018 3:58 PM
To: Stepp, Cathy <stepp.cathy@epa.gov>; Ross, David P <ross.davidp@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>; Woods, Clint <woods.clint@epa.gov>; Wildeman, Anna <wildeman.anna@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Baptist, Erik <Baptist.Erik@epa.gov>; Wright, Peter <wright.peter@epa.gov>; Cook, Steven <cook.steven@epa.gov>
Cc: Jackson, Ryan <jackson.ryan@epa.gov>; Molina, Michael <molina.michael@epa.gov>; Palich, Christian <palich.christian@epa.gov>; Frye, Tony (Robert) <frye.robert@epa.gov>; Morgan, Ashley <morgan.ashley@epa.gov>
Subject: FW: Senators Durbin and Duckworth
Importance: High

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Many thanks,

Troy

From: Lyons, Troy
Sent: Wednesday, October 3, 2018 3:52 PM
To: Levine, Carolyn <Levine.Carolyn@epa.gov>; Haman, Patricia <Haman.Patricia@epa.gov>; Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>
Cc: Palich, Christian <palich.christian@epa.gov>; Frye, Tony (Robert) <frye.robert@epa.gov>; Morgan, Ashley <morgan.ashley@epa.gov>; Richardson, RobinH <Richardson.RobinH@epa.gov>
Subject: Senators Durbin and Duckworth
Importance: High

Deliberative Process / Ex. 5

Troy M. Lyons
Associate Administrator
Office of Congressional & Intergovernmental Relations
U.S. Environmental Protection Agency
202-309-2490 (cell)

Message

From: Messina, Alec [Alec.Messina@illinois.gov]
Sent: 9/27/2018 8:11:29 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: Letter from EPA re: Willowbrook

Thank you, Josh.

Alec

From: Lewis, Josh <Lewis.Josh@epa.gov>
Sent: Thursday, September 27, 2018 2:58 PM
To: Messina, Alec <Alec.Messina@illinois.gov>
Subject: [External] Letter from EPA re: Willowbrook

Director Messina,

Please see attached.

Josh Lewis
Chief of Staff
EPA/Office of Air and Radiation
Office: 202 564 2095

State of Illinois - CONFIDENTIALITY NOTICE: The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 9/21/2018 6:47:05 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: Updated language on ETO and IRIS assessment
Attachments: Background Materials for Mtg w Willowbrook Leadership 09 21 18 Draft w ORD version2.docx

Deliberative Process / Ex. 5

From: Koerber, Mike
Sent: Friday, September 21, 2018 12:42 PM
To: Woods, Clint <woods.Clint@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: FW: Updated language on ETO and IRIS assessment

Deliberative Process / Ex. 5

Mike

From: D'Amico, Louis
Sent: Friday, September 21, 2018 11:42 AM
To: Rimer, Kelly <Rimer.Kelly@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>
Cc: Orme-Zavaleta, Jennifer <Orme-Zavaleta.Jennifer@epa.gov>
Subject: Updated language on ETO and IRIS assessment

Hi Kelly,

Deliberative Process / Ex. 5

Best,
Lou

Louis D'Amico, Ph.D.
Senior Science Advisor
Office of Research and Development
U.S. Environmental Protection Agency
Mail Code 8101R | 1200 Pennsylvania Ave, NW | Washington, DC 20460

Office: 202-564-4605 | Mobile: 703-859-1719 | email: damico.louis@epa.gov

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 10/17/2018 11:20:08 AM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: FW: Please read: EtO Weekly update
Attachments: Ethylene Oxide Weekly Update. Internal Use.docx

Deliberative Process / Ex. 5

Mike

From: Davis, Alison
Sent: Tuesday, October 16, 2018 6:31 PM
To: Bremer, Kristen <Bremer.Kristen@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Sasser, Erika <Sasser.Erika@epa.gov>; Lassiter, Penny <Lassiter.Penny@epa.gov>; Lessard, Patrick <Lessard.Patrick@epa.gov>; Smith, Darcie <Smith.Darcie@epa.gov>; Shappley, Ned <Shappley.Ned@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>; Strum, Madeleine <Strum.Madeleine@epa.gov>; Caparoso, Jennifer <Caparoso.Jennifer@epa.gov>; Mckelvey, Laura <Mckelvey.Laura@epa.gov>; Riha, Kristin <Riha.Kristin@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Chen, Xi <Chen.Xi@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Jones, Rhea <Jones.Rhea@epa.gov>; Wilson, Holly <Wilson.Holly@epa.gov>; Thurman, James <Thurman.James@epa.gov>; Hollingsworth, Terri <Hollingsworth.Terri@epa.gov>; Long, Pam <Long.Pam@epa.gov>
Subject: Please read: EtO Weekly update

Hi everyone,

We're going to start providing a weekly EtO update to Bill, Clint and the Office of Public Affairs. We'd like everyone on the team to contribute.

Deliberative Process / Ex. 5

Thanks!
-Alison

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 12/4/2018 7:32:53 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Subject: FW: Meeting re: Willowbrook samples

Please also print this for the 3:30 pm meeting.

From: Davis, Alison
Sent: Tuesday, December 04, 2018 2:31 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Smith, Darcie <Smith.Darcie@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>; Chen, Xi <Chen.Xi@epa.gov>; Cortelyou-Lee, Jan <Cortelyou-Lee.Jan@epa.gov>
Cc: Harlow, David <harlow.david@epa.gov>
Subject: RE: Meeting re: Willowbrook samples

Deliberative Process / Ex. 5

m^3

From: Koerber, Mike
Sent: Tuesday, December 04, 2018 2:21 PM
To: Rimer, Kelly <Rimer.Kelly@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Smith, Darcie <Smith.Darcie@epa.gov>;

Weinstock, Lewis <Weinstock.Lewis@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>; Chen, Xi <Chen.Xi@epa.gov>; Cortelyou-Lee, Jan <Cortelyou-Lee.Jan@epa.gov>
Cc: Harlow, David <harlow.david@epa.gov>
Subject: RE: Meeting re: Willowbrook samples

FYI – I sent this summary table to OAR for today's 3:30 pm meeting. Let me know if there is anything else to send. Thanks.

<< File: Initial Data - November 2018.pdf >>

-----Original Appointment-----
From: Wehrum, Bill
Sent: Monday, December 03, 2018 12:39 PM
To: Wehrum, Bill; Woods, Clint; Koerber, Mike; Rimer, Kelly; Davis, Alison; Smith, Darcie; Weinstock, Lewis; Bremer, Kristen; Chen, Xi
Cc: Harlow, David
Subject: Meeting re: Willowbrook samples
When: Tuesday, December 04, 2018 3:30 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: WJC - N 5400 + Video with RTP + **Personal Phone / Ex. 6**

TO: Bill Wehrum, Clint Woods, Mike Koerber, Kelly Rimer, Alison Davis, Darcie Smith, Lew Weinstock, Doris Chen, Kristen Bremer

<< Message: Re: Willowbrook samples Nov 14-20 - All spreadsheets >>

Message

From: Edwards, Jonathan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3715BC4DFC3E4D6CAF3AF1BF2FC5CA77-JEDWAR02]
Sent: 1/18/2019 4:06:50 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: FW: ORIA Shutdown Report -- Jan. 18, 2019
Attachments: ORIAshutdownreport_Jan18_2019.docx

Oops... meant to copy you on this too... Jon

From: Edwards, Jonathan
Sent: Friday, January 18, 2019 11:05 AM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>; Shaw, Betsy <Shaw.Betsy@epa.gov>; Woods, Clint <woods.Clint@epa.gov>; Harlow, David <harlow.david@epa.gov>
Subject: ORIA Shutdown Report -- Jan. 18, 2019

Deliberative Process / Ex. 5

Do not hesitate to call or email if you have further questions. ---Jon

****

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 12/10/2018 10:15:32 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: Sterigenics Town Hall 11/29/2018

Thanks, Josh

From: Lewis, Josh
Sent: Monday, December 10, 2018 5:15 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>
Cc: DeLuca, Isabel <DeLuca.Isabel@epa.gov>
Subject: RE: Sterigenics Town Hall 11/29/2018

Deliberative Process / Ex. 5

From: Koerber, Mike
Sent: Monday, December 10, 2018 5:13 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>
Cc: DeLuca, Isabel <DeLuca.Isabel@epa.gov>
Subject: RE: Sterigenics Town Hall 11/29/2018

Deliberative Process / Ex. 5

Mike

From: Lewis, Josh
Sent: Monday, December 10, 2018 5:12 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>
Cc: DeLuca, Isabel <DeLuca.Isabel@epa.gov>
Subject: FW: Sterigenics Town Hall 11/29/2018

Deliberative Process / Ex. 5

From: Wehrum, Bill
Sent: Sunday, December 02, 2018 11:49 AM
To: Woods, Clint <woods.Clint@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>
Cc: Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Fwd: Sterigenics Town Hall 11/29/2018

Let's discuss tomorrow.

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

Begin forwarded message:

From: K Personal Email / Ex. 6
Date: December 1, 2018 at 1:35:51 PM EST
To: Bill Wehrum <wehrum.bill@epa.gov>
Subject: Sterigenics Town Hall 11/29/2018

Hello Mr. Wehrum:

It was a pleasure to meet and talk with you at the recent town hall meeting. We talked briefly after the meeting when I broached the subject of the current administration and its affect on your continued work on the EtO issue in our area or the EPA's work on air quality as a whole.

You mentioned that the past administration had more affect on the EPA than the current administration and I would ask you to elaborate on what you meant. When we recently hear in the media that certain air quality restrictions are being removed there is a concern that our health is going to be negatively affected.

As you experienced at the town hall there is a great deal of cynicism in the public's view that the concerns of big (or small) business is being protected over the health of the people.

I am looking forward to your response and wish you happy holidays.

Kathleen Weaver
Mayor
City of Darien, IL

.

Message

From: Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]
Sent: 2/1/2019 8:26:03 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Subject: FW: Call

I think Bill intended to copy you too Josh.

From: Wehrum, Bill
Sent: Friday, February 01, 2019 3:16 PM
To: Lyons, Troy <lyons.troy@epa.gov>; Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Atkinson, Emily <Atkinson.Emily@epa.gov>
Subject: FW: Call

fyi

_____
Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

From: Macnabb, Philip <PMacnabb@sterigenics.com>
Sent: Friday, February 1, 2019 10:34 AM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>
Subject: Call

Bill

I would like to keep our calls on Monday at 4pm EST for the Month of February. If that is OK with you, we can go back to using your dial in number provided for earlier calls Personal Phone / Ex. 6. Let me know if you agree.

Thanks
This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Message

From: Eric Byer [ebyer@nacd.com]
Sent: 12/18/2018 4:27:24 PM
To: Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]
CC: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: Hey

Great! Thanks MG!

Delaney, please let me know when works well for Bill and Clint.

Thanks,

Eric R. Byer
President

nacd
National Association of Chemical Distributors

1560 Wilson Blvd., Suite 1100
Arlington, VA 22209
703.527.6223 x 3048 – Main Line
703.527.7747 - Fax
571.482.3048 - Direct
ebyer@nacd.com

LinkedIn

From: Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>
Sent: Tuesday, December 18, 2018 10:37 AM
To: Eric Byer <ebyer@nacd.com>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Hey

Hi and yes,
I've cc'd Delaney Rakosnik who is Bill's scheduler to see what may work that week. Bill will likely be joined by Clint Woods who has been our point person on Willowbrook, but I will certainly swing by and say hello.

Merry Christmas and I hope all is well!
Best,
Mandy

From: Eric Byer <ebyer@nacd.com>
Sent: Tuesday, December 18, 2018 9:11 AM

To: Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>
Subject: Hey

Morning!

Hope all is well.

I was talking with the Illinois Chemical Industry Council executive director the other day and he will be in town January 22-26th and I wanted to see if he and I could potentially come visit you and Bill about this Willowbrook Sterigenics mess some?

Week is pretty open so would you all have some time?

Thanks and Merry Christmas!

Eric R. Byer
President

1560 Wilson Blvd., Suite 1100
Arlington, VA 22209
703.527.6223 x 3048 - Main Line
703.527.7747 - Fax
571.482.3048 - Direct
ebyer@nacd.com

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 9/24/2018 8:33:41 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Delaney – I can confirm that 1:00 pm on Wednesday, September 26 works for us.

I am familiar with the standard security procedures at EPA unless they have changed recently.

See you on Wednesday. Thank you.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Rakosnik, Delaney [mailto:rakosnik.delaney@epa.gov]
Sent: Monday, September 24, 2018 3:46 PM
To: Tom Roberts; Lewis, Josh
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Please plan on 45 mins with Bill and Clint.

From: Tom Roberts [mailto:tcr@vnf.com]
Sent: Monday, September 24, 2018 3:42 PM
To: Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Delaney – I believe that will work for us. Let's put it on the calendar and I will confirm that we can make it. For planning purposes, how much time are we likely to have with Clint and Bill?

Thank you very much.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Rakosnik, Delaney [mailto:rakosnik.delaney@epa.gov]
Sent: Monday, September 24, 2018 3:40 PM
To: Tom Roberts; Lewis, Josh
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Hi Tom – My apologies for the delay. Bill and Clint can accommodate this meeting on Wednesday, 9/26 at 1pm. How does that work for your schedules?

Many thanks,

Delaney Rakosnik
Staff Assistant
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA

Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-0935
Email: rakosnik.delaney@epa.gov

From: Tom Roberts [mailto:tcr@vnf.com]
Sent: Monday, September 24, 2018 3:30 PM
To: Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Delaney – I am just checking in on this request. My clients will be traveling from Chicago for this meeting and are anxious to make their arrangements. Thank you.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Rakosnik, Delaney [mailto:rakosnik.delaney@epa.gov]
Sent: Friday, September 21, 2018 2:04 PM
To: Tom Roberts; Lewis, Josh
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Hi Tom,

Thank you for your note. We will review and be back with you shortly.

Many thanks,

Delaney Rakosnik
Staff Assistant
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-0935
Email: rakosnik.delaney@epa.gov

From: Tom Roberts [mailto:tcr@vnf.com]
Sent: Friday, September 21, 2018 1:46 PM
To: Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Delaney / Josh – I am a partner at the law firm of Van Ness Feldman, LLP here in DC and represent Sterigenics. I have been in communication with Clint over the last several weeks regarding the situation at Sterigenics' Willowbrook, Illinois facility.

Clint has asked me to work with the two of you to arrange a meeting with executives from Sterigenics for next week. The purpose of the meeting is to discuss the results of the stack testing at the Willowbrook facility and subsequent monitoring based on those tests.

We can meet any time next Wednesday, Thursday or Friday (September 26, 27, or 28). This is a high priority meeting for Sterigenics, so we will accommodate Clint and Bill's schedule.

Thank you for your time and consideration.

Tom Roberts | Partner
Van Ness Feldman LLP

1050 Thomas Jefferson Street, NW
Washington, DC 20007
(202) 298-1930 (o) | (202) 365-7750 (c) | tcr@vnf.com | vnf.com

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Message

From: Tom Roberts [tcr@vnf.com]
Sent: 9/24/2018 7:46:50 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Will do. Thank you.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Rakosnik, Delaney [mailto:rakosnik.delaney@epa.gov]
Sent: Monday, September 24, 2018 3:46 PM
To: Tom Roberts; Lewis, Josh
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Please plan on 45 mins with Bill and Clint.

From: Tom Roberts [mailto:tcr@vnf.com]
Sent: Monday, September 24, 2018 3:42 PM
To: Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Delaney – I believe that will work for us. Let's put it on the calendar and I will confirm that we can make it. For planning purposes, how much time are we likely to have with Clint and Bill?

Thank you very much.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Rakosnik, Delaney [mailto:rakosnik.delaney@epa.gov]
Sent: Monday, September 24, 2018 3:40 PM
To: Tom Roberts; Lewis, Josh
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Hi Tom – My apologies for the delay. Bill and Clint can accommodate this meeting on Wednesday, 9/26 at 1pm. How does that work for your schedules?

Many thanks,

Delaney Rakosnik
Staff Assistant
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-0935
Email: rakosnik.delaney@epa.gov

From: Tom Roberts [mailto:tcr@vnf.com]
Sent: Monday, September 24, 2018 3:30 PM
To: Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Delaney – I am just checking in on this request. My clients will be traveling from Chicago for this meeting and are anxious to make their arrangements. Thank you.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Rakosnik, Delaney [mailto:rakosnik.delaney@epa.gov]
Sent: Friday, September 21, 2018 2:04 PM
To: Tom Roberts; Lewis, Josh
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Hi Tom,

Thank you for your note. We will review and be back with you shortly.

Many thanks,

Delaney Rakosnik
Staff Assistant
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-0935
Email: rakosnik.delaney@epa.gov

From: Tom Roberts [mailto:tcr@vnf.com]
Sent: Friday, September 21, 2018 1:46 PM
To: Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Delaney / Josh – I am a partner at the law firm of Van Ness Feldman, LLP here in DC and represent Sterigenics. I have been in communication with Clint over the last several weeks regarding the situation at Sterigenics' Willowbrook, Illinois facility.

Clint has asked me to work with the two of you to arrange a meeting with executives from Sterigenics for next week. The purpose of the meeting is to discuss the results of the stack testing at the Willowbrook facility and subsequent monitoring based on those tests.

We can meet any time next Wednesday, Thursday or Friday (September 26, 27, or 28). This is a high priority meeting for Sterigenics, so we will accommodate Clint and Bill's schedule.

Thank you for your time and consideration.

Tom Roberts | Partner
Van Ness Feldman LLP

1050 Thomas Jefferson Street, NW
Washington, DC 20007
(202) 298-1930 (o) | (202) 365-7750 (c) | tcr@vnf.com | vnf.com

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Message

From: Ashley, Jackie [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=01A9A3CADFA14C509D09CDAE3498DD43-JASHLEY]
Sent: 9/17/2018 1:56:02 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Davis, Matthew [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=84111ec08c504b6baae0510b2d2ce46a-Davis, Matthew]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]
CC: Lubetsky, Jonathan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e125d09a658e48119789ccae5712b4a5-JLUBETSK]; Mroz, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=64b0c7f807df436a9b40ce52f7dec34c-Mroz, Jessi]; Haman, Patricia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ebb27cd881d41b19a30a491dc3f3f57-phaman]; Terry, Sara [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a5f08a9bf1324b05bc02a7dd2ea695e4-STERRY]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Subject: RE: Rep. Foster requested call on Willowbrook, IL

Deliberative Process / Ex. 5

Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 – ashley.jackie@epa.gov

From: Lewis, Josh
Sent: Monday, September 17, 2018 9:53 AM
To: Davis, Matthew <Davis.Matthew@epa.gov>
Cc: Lubetsky, Jonathan <Lubetsky.Jonathan@epa.gov>; Mroz, Jessica <mroz.jessica@epa.gov>; Haman, Patricia <Haman.Patricia@epa.gov>; Terry, Sara <Terry.Sara@epa.gov>; Ashley, Jackie <Ashley.Jackie@epa.gov>; Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: Rep. Foster requested call on Willowbrook, IL

Yes. Bill and Clint can do a call w/ the Congressman. Could happen as soon as tomorrow. Adding Delaney who can help find a time.

From: Davis, Matthew
Sent: Friday, September 14, 2018 4:07 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Cc: Lubetsky, Jonathan <Lubetsky.Jonathan@epa.gov>; Mroz, Jessica <mroz.jessica@epa.gov>; Haman, Patricia <Haman.Patricia@epa.gov>; Terry, Sara <Terry.Sara@epa.gov>; Ashley, Jackie <Ashley.Jackie@epa.gov>
Subject: Rep. Foster requested call on Willowbrook, IL

Hi Josh,

Deliberative Process / Ex. 5

Thanks,
Matthew

Matthew Davis
Office of Congressional Affairs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW, MC-1301A
Washington, DC 20460
(202) 564-1267

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 9/26/2018 5:38:01 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Wright, Rhonda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5d6d041a34ea466dac1f7985308e35ea-RWRIGH04]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]

Subject: Meeting Forward Notification: Follow up on EtO and Willowbrook
Location: **Personal Phone / Ex. 6**

Start: 9/26/2018 8:00:00 PM
End: 9/26/2018 8:30:00 PM

Recurrence: (none)

Your meeting was forwarded

D'Amico, Louis has forwarded your meeting request to additional recipients.

Meeting

Follow up on EtO and Willowbrook

Meeting Time

Wednesday, September 26, 2018 4:00 PM-4:30 PM.

Recipients

Bussard, David

pjb7@cdc.gov

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 9/26/2018 2:05:04 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: South, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1ead249df78840c9928874ec2ec4f9a6-PSouth]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; Shappley, Ned [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5fc7fde372054ab5ac38f24b9072b73d-Shappley, N]
Subject: Re: 1 pm meeting today with Sterigenics

Yes - we will be in C301

Sent from my iPhone

On Sep 26, 2018, at 9:35 AM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:

Deliberative Process / Ex. 5

Josh

Message

From: Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]
Sent: 9/25/2018 9:06:44 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: Hanson, Andrew [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=976b280c3eaf4e50b91a25d75466cf3c-Hanson, Andrew]; Cory, Preston (Katherine) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bfd80b15f6d04a3ba11fc8ca3c85bc50-Cory, Kathe]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Saddler, Melissa [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a6321fe198d9455a949533193c4c6d57-Saddler, Melissa]
Subject: Re: Meeting request

Ok - I have left the office for the day but will add Preston to the 9:30am first thing in the morning.

Sent from my iPhone

On Sep 25, 2018, at 5:03 PM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:

> The 10 AM meeting is totally unrelated to the 930 and is a meeting that Clint and Bill are doing with Cathy and Kurt from region five.
>
> On Sep 25, 2018, at 4:59 PM, Hanson, Andrew <Hanson.Andrew@epa.gov> wrote:
>
>> Preston confirmed the logistics with the visiting DuPage County folks, and she should be on the 9:30 meeting invite as well.
>>
>> Unless others can think of a reason not to, you can jettison the 10:00 a.m. scheduler.
>>
>> Thanks Emily.
>>
>> On Sep 25, 2018, at 4:54 PM, Atkinson, Emily <Atkinson.Emily@epa.gov> wrote:
>>
>>> We have two mornings on this topic . . . .
>>>
>>> The 9:30am is the meeting with the stakeholders – and Andrew you are on this meeting but Preston you are not on this invite. And Andrew, could you clarify if you have been in touch to confirm the date/time with the stakeholders?
>>>
>>> The 10am is a meeting with the Region on the same topic – and Preston you are on that invite but Andrew you are not.
>>>
>>> Emily Atkinson
>>> Special Assistant
>>> Management Analyst
>>> Immediate Office of the Assistant Administrator
>>> Office of Air and Radiation, USEPA

Room 5406E, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-1850
Email: atkinson.emily@epa.gov

From: Hanson, Andrew
Sent: Tuesday, September 25, 2018 4:41 PM
To: Cory, Preston (Katherine) <Cory.Preston@epa.gov>; Atkinson, Emily <Atkinson.Emily@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Saddler, Melissa <Saddler.Melissa@epa.gov>
Subject: Re: Meeting request

Willing to be corrected, but I've worked with 9:30 from the jump.

Emily and Delaney?

On Sep 25, 2018, at 4:37 PM, Cory, Preston (Katherine) <Cory.Preston@epa.gov> wrote:

> Is this occurring at 10:00am or 9:30am? Calendar invite says 10 but email says 930.
>
> K. Preston Cory
> U.S. Environmental Protection Agency
> Congressional and Intergovernmental Relations
> 202-579-4281
>
> On Sep 24, 2018, at 11:03 AM, Rakosnik, Delaney <rakosnik.delaney@epa.gov> wrote:
>
>> Dear Andrew,
>> Mr. Cronin and Mr. Monroe are confirmed for a 30 min meeting on Wednesday, Sept 26th starting at 9:30am with Bill Wehrum and Clint Woods.
>> Directions and procedures to 1200 Pennsylvania Avenue NW:
>>
>>> Metro: If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton

Federal Building, North Entrance.

Taxi: Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12th Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

Security Procedures: A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. If you are a foreign national entering on a non-US passport, please let us know in advance, as there is a separate clearance process.

Upon arrival, let the guards know that you were instructed to call 202-564-7404 for a security escort.

Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Many thanks,

Delaney Rakosnik

Staff Assistant
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-2229
Email: rakosnik.delaney@epa.gov

From: Hanson, Andrew
Sent: Monday, September 24, 2018 10:33 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>; Rush, Alan <Rush.Alan@epa.gov>; Cory, Preston (Katherine) <Cory.Preston@epa.gov>
Cc: Atkinson, Emily <Atkinson.Emily@epa.gov>; Farrar, Wanda <farrar.wanda@epa.gov>; Morgan, Ruthw <morgan.ruthw@epa.gov>; Henigin, Mary <Henigin.Mary@epa.gov>; Noonan, Jenny <Noonan.Jenny@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Hannon, Arnita <Hannon.Arnita@epa.gov>; Rowan, Anne <rowan.anne@epa.gov>; Deamer, Eileen <deamer.eileen@epa.gov>; Bowles, Jack <Bowles.Jack@epa.gov>
Subject: RE: Meeting request

Thanks, Alan and Josh, for the quick flip on this. Preston Cory was able to get through to Clint, so we look forward to hearing from Delaney on where to bring Chairman Cronin and Mr. Monroe (the county's lobbyist) on Wednesday morning.

Thanks again

From: Lewis, Josh
Sent: Monday, September 24, 2018 10:26 AM
To: Rush, Alan <Rush.Alan@epa.gov>

Cc: Atkinson, Emily <Atkinson.Emily@epa.gov>; Farrar, Wanda <farrar.wanda@epa.gov>; Morgan, Ruthw <morgan.ruthw@epa.gov>; Henigin, Mary <Henigin.Mary@epa.gov>; Noonan, Jenny <Noonan.Jenny@epa.gov>; Hanson, Andrew <Hanson.Andrew@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: Meeting request

Bill and Clint are here on Wed and able to do a meeting at 9:30. Delaney is going to set that up shortly. OAQPS: pls let us know who you want on from your office.

Josh

From: Rush, Alan
Sent: Monday, September 24, 2018 10:13 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Cc: Atkinson, Emily <Atkinson.Emily@epa.gov>; Farrar, Wanda <farrar.wanda@epa.gov>; Morgan, Ruthw <morgan.ruthw@epa.gov>; Henigin, Mary <Henigin.Mary@epa.gov>; Noonan, Jenny <Noonan.Jenny@epa.gov>; Hanson, Andrew <Hanson.Andrew@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>
Subject: FW: Meeting request
Importance: High

Josh,

This morning we received this meeting request from OCIR. Dan Cronin, Chairman of the DuPage County (Illinois) Board, initially wanted to meet with either Bill or Clint, but as they are both out of town, would still like to meet with someone from OAR. The topic is about levels of ethylene oxide surrounding the Sterigenics facility in Willowbrook, IL.

Alan

From: Hanson, Andrew
Sent: Monday, September 24, 2018 9:39 AM
To: Farrar, Wanda <farrar.wanda@epa.gov>; Rush, Alan <Rush.Alan@epa.gov>; Morgan, Ruthw <morgan.ruthw@epa.gov>
Cc: Cory, Preston (Katherine) <Cory.Preston@epa.gov>; Noonan, Jenny <Noonan.Jenny@epa.gov>
Subject: FW: Meeting request
Importance: High

Hi Wanda, Alan and Ruth –

Per the note at bottom, DuPage County (IL) Chairman Dan Cronin will be in DC on Wednesday and has requested a meeting to discuss issues associated with the Sterigenics facility in Willowbrook, IL. As it turns out, Bill Wehrum and Clint Woods will be in Illinois on Thursday to discuss this issue with state and local officials. That said, Chairman Cronin will be here in town the day before that meeting and would like to speak with the appropriate person at EPA HQ about this.

Can you guys run an expedited request up the chain and let me know who that person would be? Preston Cory, a member of OCIR's political team, is checking in with Clint about it, but I wanted to run it through you guys just in case he is unavailable/unable to respond quickly.

Thank you, and please let me know.

AH
OCIR
564-3664

From: Cory, Preston (Katherine)
Sent: Monday, September 24, 2018 9:21 AM
To: Hanson, Andrew <Hanson.Andrew@epa.gov>

Subject: FW: Meeting request
Importance: High

Andy- The Chairman would like to meet at HQ on Wednesday, but I need your help setting up the meeting. Who in OAR is the best person with whom he could speak?

From: Monroe, Loren [mailto:Loren_Monroe@BGRdc.com]
Sent: Sunday, September 23, 2018 3:31 PM
To: Cory, Preston (Katherine) <Cory.Preston@epa.gov>
Subject: Re: Meeting request

Thank you. It is an important issue for the Chairman.

Look forward to hearing from you tomorrow.

Loren Monroe

On Sep 22, 2018, at 3:05 PM, Cory, Preston (Katherine) <Cory.Preston@epa.gov> wrote:

> I'll set something up- our air principals will be on travel, but I'll make sure one of our career staffers is available to meet with him.
>
> K. Preston Cory
> U.S. Environmental Protection Agency
> Congressional and Intergovernmental Relations
> 202-579-4281
>
> On Sep 22, 2018, at 1:57 PM, Monroe, Loren <Loren_Monroe@BGRdc.com> wrote:
>
>> Thank you for

the very helpful information. Chairman Cronin would still like to meet with EPA on Wednesday while he is in DC if at all possible.

Thank you,

Loren Monroe

On Sep 21, 2018, at 6:49 PM, Cory, Preston (Katherine) <Cory.Preston@epa.gov> wrote:

Hi Loren,

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on 9/27. I don't know if he will be back in Illinois by the nor if t

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Loren_Monroe@BGRdc.com>wrote:

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ory.Preston@epa.gov>**Subject:** Meeting request

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Thirteenth Street, NW Washington, DC 20005 Direct: (202) 661.631

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Loren_Monroe@bgrdc.comwww.bgrdc.com

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 9/25/2018 5:58:04 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: CONFIRMED RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Delaney – we will have one additional person join us tomorrow for the meeting.

Robert DeMott PhD, DABT
Principal Toxicologist, Ramboll

Thank you.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Rakosnik, Delaney [mailto:rakosnik.delaney@epa.gov]
Sent: Monday, September 24, 2018 4:36 PM
To: Tom Roberts; Lewis, Josh
Subject: CONFIRMED RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Dear Tom,
You are confirmed for a 45 min meeting starting at 1pm on Wednesday, 9/26, with Bill Wehrum and Clint Woods.
Directions and procedures to 1200 Pennsylvania Avenue NW:

Metro: If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

Taxi: Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12th Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

Security Procedures: A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. If you are a foreign national entering on a non-US passport, please let us know in advance, as there is a separate clearance process.

Upon arrival, let the guards know that you were instructed to call 202-564-7404 for a security escort. Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Many thanks,

Delaney Rakosnik
Staff Assistant
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-2229
Email: rakosnik.delaney@epa.gov

From: Tom Roberts [mailto:tcr@vnf.com]
Sent: Monday, September 24, 2018 3:42 PM
To: Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Delaney – I believe that will work for us. Let's put it on the calendar and I will confirm that we can make it. For planning purposes, how much time are we likely to have with Clint and Bill?

Thank you very much.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Rakosnik, Delaney [mailto:rakosnik.delaney@epa.gov]
Sent: Monday, September 24, 2018 3:40 PM
To: Tom Roberts; Lewis, Josh
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Hi Tom – My apologies for the delay. Bill and Clint can accommodate this meeting on Wednesday, 9/26 at 1pm. How does that work for your schedules?

Many thanks,

Delaney Rakosnik
Staff Assistant
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-0935
Email: rakosnik.delaney@epa.gov

From: Tom Roberts [mailto:tcr@vnf.com]
Sent: Monday, September 24, 2018 3:30 PM
To: Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Delaney – I am just checking in on this request. My clients will be traveling from Chicago for this meeting and are anxious to make their arrangements. Thank you.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Rakosnik, Delaney [mailto:rakosnik.delaney@epa.gov]
Sent: Friday, September 21, 2018 2:04 PM
To: Tom Roberts; Lewis, Josh
Subject: RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Hi Tom,

Thank you for your note. We will review and be back with you shortly.

Many thanks,

Delaney Rakosnik
Staff Assistant
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-0935
Email: rakosnik.delaney@epa.gov

From: Tom Roberts [mailto:tcr@vnf.com]
Sent: Friday, September 21, 2018 1:46 PM
To: Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Delaney / Josh – I am a partner at the law firm of Van Ness Feldman, LLP here in DC and represent Sterigenics. I have been in communication with Clint over the last several weeks regarding the situation at Sterigenics' Willowbrook, Illinois facility.

Clint has asked me to work with the two of you to arrange a meeting with executives from Sterigenics for next week. The purpose of the meeting is to discuss the results of the stack testing at the Willowbrook facility and subsequent monitoring based on those tests.

We can meet any time next Wednesday, Thursday or Friday (September 26, 27, or 28). This is a high priority meeting for Sterigenics, so we will accommodate Clint and Bill's schedule.

Thank you for your time and consideration.

Tom Roberts | Partner
Van Ness Feldman LLP
1050 Thomas Jefferson Street, NW
Washington, DC 20007
(202) 298-1930 (o) | (202) 365-7750 (c) | tcr@vnf.com | vnf.com

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Message

From: Tom Roberts [tcr@vnf.com]
Sent: 9/24/2018 8:39:25 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: RE: CONFIRMED RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Delaney – at the moment, the list of participants is:

Philip Macnaab, President, Sterigenics
Kathy Hoffman, Senior Vice President, Sterigenics
Byron Taylor, Sidley Austin, Outside Environmental Counsel to Sterigenics
Tom Roberts, Van Ness Feldman, Outside Government Relations Counsel to Sterigenics

I do not expect this list to change, but if it does will be sure to notify you.

Thank you.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

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Staff Assistant
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-2229
Email: rakosnik.delaney@epa.gov

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To: Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
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From: Tom Roberts [mailto:tcr@vnf.com]
Sent: Friday, September 21, 2018 1:46 PM
To: Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods

Delaney / Josh – I am a partner at the law firm of Van Ness Feldman, LLP here in DC and represent Sterigenics. I have been in communication with Clint over the last several weeks regarding the situation at Sterigenics' Willowbrook, Illinois facility.

Clint has asked me to work with the two of you to arrange a meeting with executives from Sterigenics for next week. The purpose of the meeting is to discuss the results of the stack testing at the Willowbrook facility and subsequent monitoring based on those tests.

We can meet any time next Wednesday, Thursday or Friday (September 26, 27, or 28). This is a high priority meeting for Sterigenics, so we will accommodate Clint and Bill's schedule.

Thank you for your time and consideration.

Tom Roberts | Partner
Van Ness Feldman LLP

1050 Thomas Jefferson Street, NW
Washington, DC 20007
(202) 298-1930 (o) ‖ (202) 365-7750 (c) ‖ tcr@vnf.com ‖ vnf.com

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Message

From: Noonan, Jenny [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=19D41FF0E3054AAFA47D3C33308E5B30-JNOONAN]
Sent: 3/6/2019 1:03:38 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
CC: Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Ashley, Jackie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=01a9a3cadfa14c509d09cdae3498dd43-JASHLEY]; Long, Pam [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f32548c120b14bd2af1d2c2a12bf641c-PLONG]
Subject: Draft EtO Response 3-6-19.docx
Attachments: Draft EtO Response 3-6-19.docx

Hi Josh –

Deliberative Process / Ex. 5

Thanks,
Jenny

Message

From: Lewis, Josh [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22D1D3BB3F84436A524F76AB6C79D7E-JOLEWIS]
Sent: 3/12/2019 2:48:24 PM
To: Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Ok thanks

From: Davis, Alison
Sent: Tuesday, March 12, 2019 10:42 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Just heard from Mike. We'll circle up with R5 to find out whether there is any additional info they didn't add to yesterday's pager. Thanks!

From: Lewis, Josh
Sent: Tuesday, March 12, 2019 10:16 AM
To: Weinstock, Lewis <Weinstock.Lewis@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Deliberative Process / Ex. 5

From: Weinstock, Lewis
Sent: Tuesday, March 12, 2019 9:56 AM
To: Davis, Alison <Davis.Alison@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

2 pm is ok for me.

Lewis Weinstock | Office of Air Quality Planning & Standards | U.S. Environmental Protection Agency | Research Triangle Park, NC 27711 | Phone: 919-541-3661|

From: Davis, Alison
Sent: Tuesday, March 12, 2019 9:54 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Josh –
I'm available if others are.

Deliberative Process / Ex. 5

From: Lewis, Josh
Sent: Tuesday, March 12, 2019 9:45 AM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Deliberative Process / Ex. 5

Josh Lewis
Chief of Staff
EPA/Office of Air and Radiation
Office: 202 564 2095

Message

From: Lewis, Josh [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22D1D3BB3F84436A524F76AB6C79D7E-JOLEWIS]
Sent: 3/12/2019 2:48:16 PM
To: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Ok thanks

From: Koerber, Mike
Sent: Tuesday, March 12, 2019 10:48 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Re: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Deliberative Process / Ex. 5

Sent from my iPhone

On Mar 12, 2019, at 10:39 AM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:

Deliberative Process / Ex. 5

From: Koerber, Mike
Sent: Tuesday, March 12, 2019 10:38 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: Re: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Josh - I'll be there in the room. I arrived earlier today.

Sent from my iPhone

On Mar 12, 2019, at 10:16 AM, Lewis, Josh <Lewis.Josh@epa.gov> wrote:

Deliberative Process / Ex. 5

From: Weinstock, Lewis
Sent: Tuesday, March 12, 2019 9:56 AM
To: Davis, Alison <Davis.Alison@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

2 pm is ok for me.

Lewis Weinstock | Office of Air Quality Planning & Standards | U.S. Environmental Protection Agency | Research Triangle Park, NC 27711 | Phone: 919-541-3661|

From: Davis, Alison
Sent: Tuesday, March 12, 2019 9:54 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Josh –

Deliberative Process / Ex. 5

From: Lewis, Josh
Sent: Tuesday, March 12, 2019 9:45 AM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>
Cc: Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: Conversation later today re: Lake County + General Discussion of Other Priority Sites

Deliberative Process / Ex. 5

Josh Lewis
Chief of Staff
EPA/Office of Air and Radiation
Office: 202 564 2095

Message

From: Lewis, Josh [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22D1D3BB3F84436A524F76AB6C79D7E-JOLEWIS]
Sent: 3/4/2019 7:30:12 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: RE: Bloomberg Environment request for EPA response on the nature of meetings Sterigenics CEO Mr. Phill McNabb had with EPA Assistant Administrator Bill Wehrum

I didn't address the specifics of the Sterigenics calls when I responded to the constituent last week. I emailed her, "…Bill has accepted EtO call and meeting requests from a range of stakeholders, including calls with Sterigenics, webinars with the general public, the in person meeting in Willowbrook, and the one-on-one call he had with you in December."

From: Woods, Clint
Sent: Monday, March 04, 2019 2:02 PM
To: Lewis, Josh <Lewis.Josh@epa.gov>
Subject: FW: Bloomberg Environment request for EPA response on the nature of meetings Sterigenics CEO Mr. Phill McNabb had with EPA Assistant Administrator Bill Wehrum
Importance: High

FYI, in case the statement you had may be applicable

From: Abboud, Michael
Sent: Monday, March 4, 2019 1:54 PM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>; Woods, Clint <woods.Clint@epa.gov>
Cc: Konkus, John <konkus.john@epa.gov>; Hewitt, James <hewitt.james@epa.gov>; McFaul, Jessica <mcfaul.jessica@epa.gov>; Block, Molly <block.molly@epa.gov>
Subject: FW: Bloomberg Environment request for EPA response on the nature of meetings Sterigenics CEO Mr. Phill McNabb had with EPA Assistant Administrator Bill Wehrum
Importance: High

Bill is there anything you want us to say here?

From: Saiyid, Amena <asaiyid@bloombergenvironment.com>
Sent: Monday, March 4, 2019 1:00 PM
To: Press <Press@epa.gov>; Block, Molly <block.molly@epa.gov>; Konkus, John <konkus.john@epa.gov>; Abboud, Michael <abboud.michael@epa.gov>
Subject: Bloomberg Environment request for EPA response on the nature of meetings Sterigenics CEO Mr. Phill McNabb had with EPA Assistant Administrator Bill Wehrum
Importance: High

Good Afternoon All,
I am writing to get some context on the nature of calls AA Wehrum had several times with Sterigenics CEO Phill McNabb in December. Specifically, he spoke to Mr. McNabb on Dec. 3, 10, and the 17, and then spoke to him on Jan. 28. According to Mr. Wehrum's calendar, which was released last Friday, the AA also held several meetings with the samples of ethylene oxide that EPA collected from Sterigenics' Willowbrook facility, where this pollutant was found to be present in elevated concentrations.

Could you elaborate on the nature of the meetings in December, as they precede EPA's decision to seek comment on its newly updated health risk value for ethylene oxide in a related proposed change to MACT for hydrochloric acid production facilities.

I also understand that OMB reached out to Mr. Wehrum to discuss the ethylene oxides issue during the government shutdown.

I would like to know the status of the review of ethylene oxide and whether EPA is still continuing its efforts to regulate this carcinogen.

Thanks,

Amena

P.S. Deadline is as soon as you can respond.

: : : : : : : : : : : : : : : : : : :

Amena H. Saiyid
Air Reporter

Bloomberg Environment

D: 703 341-3695
C: 571-319-6682
asaiyid@bloombergenvironment.com

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 12/3/2018 4:51:16 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 12/3/2018 8:00:00 PM
End: 12/3/2018 8:30:00 PM
Show Time As: Busy

Message

From: Wehrum.Bill@epa.gov [Wehrum.Bill@epa.gov]
Sent: 2/16/2019 12:16:33 AM
To: Macnabb, Philip [PMacnabb@sterigenics.com]
CC: tcr@vnf.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=60634a7f78964380838648935cd3d7b1-tcr@vnf.com]
Subject: Re: IL EPA

Phil - Thanks for letting us know.

_____
Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

> On Feb 15, 2019, at 7:12 PM, Macnabb, Philip <PMacnabb@sterigenics.com> wrote:
>
> Bill
>
> I wanted to make you aware that tonight at 5pm we received a "seal order" from IL EPA to stop using EO due to public health crisis. We will stop processing until we can get in front of a judge.
>
> Feel free to call my cell at Personal Phone / Ex. 6 if you would like further details.
>
> Sent from my iPhone
> This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 3/11/2019 2:04:02 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Call with Phil McNabb re: Sterigenics
Attachments: Untitled Attachment
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 3/11/2019 8:00:00 PM
End: 3/11/2019 8:30:00 PM
Show Time As: Busy

Recurrence: Weekly
every Monday from 4:00 PM to 4:30 PM

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 2/4/2019 2:10:26 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]

Subject: Phone call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 2/4/2019 4:30:00 PM
End: 2/4/2019 5:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 2/1/2019 8:39:31 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Call with Phil MacNabb re: Sterigenics
Attachments: Untitled Attachment
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 2/11/2019 9:00:00 PM
End: 2/11/2019 9:30:00 PM
Show Time As: Busy

Recurrence: Weekly
every Monday from 4:00 PM to 4:30 PM

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 12/12/2018 8:46:54 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Mike Koerber (Koerber.Mike@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]
CC: Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]

Subject: Conference call with Willowbrook citizen Jennifer McConaghy re: Sterigenics facility
Location: WJC - N 5400 + conference call

Start: 12/13/2018 5:30:00 PM
End: 12/13/2018 6:00:00 PM
Show Time As: Busy

Alison #: Personal Phone / Ex. 6

Jennifer #: Personal Phone / Ex. 6

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 2/22/2019 4:37:38 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Schwab, Justin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=eed0f609c0944cc2bbdb05df3a10aadb-Schwab, Jus]; Newton, Cheryl [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ae08c2f1c2304a61bf7c01de62f35dbf-Cenewton]; Kurt Thiede (thiede.kurt@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc09fac5acc4ce1ba689fb2ce70d459-Thiede, Kur]; Nelson, Leverett [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2229a07c2cb442b182332d9dcc325f13-LNelson]; Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]; Brazauskas, Joseph [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=babf7b77aeec4ffeaad446bb35e05b24-Brazauskas,]; Mike Koerber (Koerber.Mike@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]
CC: Leopold, Matt (OGC) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4e5cdf09a3924dada6d322c6794cc4fa-Leopold, Ma]

Subject: Call with Region 5 re: Sterigenics
Attachments: Re: Sterigenics - foundational support for USEPA's sampling data
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM
Show Time As: Busy

TO: Bill Wehrum, Clint Woods, Justin Schwab, Cheryl Newton, Kurt Thiede, Levertt Nelson, Ed Nam, Joe Brazaskas, Mike Koerber, David Harlow

Re: Sterigenics - foundational sup...

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 2/14/2019 2:05:01 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 { Personal Phone / Ex. 6

Start: 2/14/2019 6:15:00 PM
End: 2/14/2019 6:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 2/11/2019 8:21:48 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]

Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 2/19/2019 6:00:00 PM
End: 2/19/2019 6:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 11/29/2018 8:25:38 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]

Subject: Sterigenics Facility Tour
Location: Willowbrook, IL

Start: 11/29/2018 7:00:00 PM
End: 11/29/2018 9:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 11/29/2018 8:24:53 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]

Subject: Meeting with Willowbrook elected officials
Attachments: FINAL-willowbrook elected AGENDA 11-29.docx
Location: Willowbrook, IL

Start: 11/29/2018 5:00:00 PM
End: 11/29/2018 6:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 11/27/2018 4:01:17 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Mike Koerber (Koerber.Mike@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Deamer, Eileen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f2d19c60656344f5b14361c0acc826d2-EDeamer]
CC: Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]; Kelley, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e154fa5a5f744c70aa3da58e3f87aabe-JKelley]; Siegel, Kathryn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f57a52efead9497cb582b11b8c85f09f-KSiege02]; Cain, Alexis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0249d52afe7a491ea6859bf276e694e9-ACain]; Fortin, Denise [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7e58c489d49f46629d3512e1e9731135-DGawlins]; Engelmann, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2bd5d5e249bb4baeaf9736815a6e07bb-REngelma]; James Payne (payne.james@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=61b3204a683041079512b122c580a569-Payne, Jame]; Kurt Thiede (thiede.kurt@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc09fac5acc4ce1ba689fb2ce70d459-Thiede, Kur]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]

Subject: NATA briefing for Lake County Elected Officials
Attachments: Details and VTC for 11/28 meeting
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM
Show Time As: Busy

TO: Bill Wehrum, Clint Woods, Mike Koerber, Kelly Rimer
CC: Alison Davis, Eileen Deamer

Details and VTC
for 11/28 meeting

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 11/26/2018 2:59:35 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]

Subject: Call with Phil McNabb re: Sterigenics
Location: **Personal Phone / Ex. 6**

Start: 11/26/2018 9:30:00 PM
End: 11/26/2018 10:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 11/1/2018 9:00:36 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]

Subject: Phone call with Phil Macnabb re: Sterigenics (confirmed)
Attachments: Untitled Attachment
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 11/5/2018 9:00:00 PM
End: 11/5/2018 9:30:00 PM
Show Time As: Busy

Recurrence: Weekly
every Monday from 4:00 PM to 4:30 PM

TO: Bill Wehrum, David Harlow, Clint Woods, Mandy Gunasekara

Note: This meeting was scheduled out of a phone call with Phil MacNabb. We called him back to confirm the phone call.

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 10/26/2018 6:39:14 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]

Subject: Phone call with Phil Macnabb re: Sterigenics (confirmed)
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 10/29/2018 8:00:00 PM
End: 10/29/2018 8:30:00 PM
Show Time As: Busy

TO: Bill Wehrum, David Harlow, Clint Woods, Mandy Gunasekara

Note: This meeting was scheduled out of a phone call with Phil MacNabb. Mr. MacNabb called OAR and requested this meeting. We called him back to confirm the phone call. He was reluctant to give an email address. There is no email trail.

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 9/24/2018 8:34:48 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]

Subject: Videoconference with Region 5 and stakeholders re: Willowbrook
Location: WJC - N 5400

Start: 9/28/2018 4:30:00 PM
End: 9/28/2018 6:00:00 PM
Show Time As: Busy

11:30am Central Time
To: Bill Wehrum, Clint Woods

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 9/24/2018 7:56:48 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]

Subject: Meeting with Sterigenics (confirmed)
Attachments: CONFIRMED RE: Request on Behalf of Sterigenics for Meeting with AA Wehrum / Deputy AA Woods
Location: WJC - N 5400

Start: 9/26/2018 5:00:00 PM
End: 9/26/2018 5:45:00 PM
Show Time As: Busy

TO: Bill Wehrum, Clint Woods, David Harlow

Meeting attendees (in person)

- Philip Macnaab, President, Sterigenics
- Kathy Hoffman, Senior Vice President, Sterigenics
- Byron Taylor, Sidley Austin, Outside Environmental Counsel to Sterigenics
- Tom Roberts, Van Ness Feldman, Outside Government Relations Counsel to Sterigenics

CONFIRMED RE: Request on Beha...

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 9/21/2018 3:15:16 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Stepp, Cathy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=befdafc0fa1a425eae232f60ad9bda1d-Stepp, Cath]; Thiede, Kurt [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc09fac5acc4ce1ba689fb2ce70d459-Thiede, Kur]
CC: Payne, James [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=61b3204a683041079512b122c580a569-Payne, Jame]; Cory, Preston (Katherine) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bfd80b15f6d04a3ba11fc8ca3c85bc50-Cory, Kathe]

Subject: Meeting re: Willowbrook
Attachments: FW: DC Next Week
Location: WJC - N 5400

Start: 9/26/2018 2:00:00 PM
End: 9/26/2018 2:30:00 PM
Show Time As: Busy

TO: Bill Wehrum, Clint Woods, Cathy Stepp, Kurt Thiede, James Payne, Preston Cory

FW: DC Next Week

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 9/17/2018 3:56:29 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Ringel, Aaron [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1654bdc951284a6d899a418a89fb0abf-Ringel, Aar]; Davis, Matthew [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=84111ec08c504b6baae0510b2d2ce46a-Davis, Matthew]

Subject: Call with Rep. Foster re: Willowbrook, IL Sterigenics facility and ethylene oxide
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 9/18/2018 2:00:00 PM
End: 9/18/2018 2:30:00 PM
Show Time As: Busy

To: Bill Wehrum, Clint Woods, Aaron Ringel, Matthew Davis

Appointment

From: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Sent: 8/3/2018 3:42:08 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Dominguez, Alexander [dominguez.alexander@epa.gov]; Schwab, Justin [Schwab.Justin@epa.gov]; Yamada, Richard (Yujiro) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4c34a1e0345e4d26b361b5031430639d-Yamada, Yuj]

Subject: Meeting with American Chemistry Council
Attachments: CONFIRMED RE: 8/23 Meeting
Location: WJC - N 5400

Start: 8/23/2018 3:00:00 PM
End: 8/23/2018 4:15:00 PM
Show Time As: Busy

TO: Bill Wehrum, Clint Woods, Alex Dominguez, Justin Schwab, Richard Yamada

CONFIRMED RE:
8/23 Meeting

Outside Attendees (in person):

From ACC

- David Fischer
- Laura Brust
- Leslie Hulse
- Bill Gulledge
- Brendan Mascarenhas

From Exponent

- Aby Li
- Jane Teta
- Jim Bus
- Ken Bogen

- Tom Roberts (representing Sterigenics),
- Chris Klosen (Balchem- EO supplier to sterilizer industry),

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 12/4/2018 8:18:10 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 - Personal Phone / Ex. 6

Start: 12/17/2018 9:00:00 PM
End: 12/17/2018 9:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 12/4/2018 8:13:24 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]

Subject: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 12/10/2018 10:00:00 PM
End: 12/10/2018 10:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 12/3/2018 5:39:08 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Mike Koerber (Koerber.Mike@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Smith, Darcie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ae3c2377efb42879b943db8796ddc05-Smith, Darcie]; Weinstock, Lewis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=df30e068efb24a24b35d63be0596ad9b-LWEINS02]; Bremer, Kristen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b7ad6f4a11064ef08cb03aec9dc8e892-KBREMER]; Chen, Xi [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cb29e8e6f2064817a3a722f52e000f2b-Chen, Xi]
CC: Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]

Subject: Meeting re: Willowbrook samples
Attachments: Re: Willowbrook samples Nov 14-20 - All spreadsheets
Location: WJC - N 5400 + Video with RTP + Personal Phone / Ex. 6

Start: 12/4/2018 8:30:00 PM
End: 12/4/2018 9:00:00 PM
Show Time As: Busy

TO: Bill Wehrum, Clint Woods, Mike Koerber, Kelly Rimer, Alison Davis, Darcie Smith, Lew Weinstock, Doris Chen, Kristen Bremer

Re: Willowbrook samples Nov 14-...

Appointment

From: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Sent: 12/3/2018 4:49:19 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; David Harlow (harlow.david@epa.gov) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]

Subject: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 12/3/2018 10:00:00 PM
End: 12/3/2018 10:30:00 PM
Show Time As: Busy

Appointment

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 3/12/2019 2:21:11 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: General Discussion re: Lake County
Location: WJC-N 5406 + Video to RTP

Start: 3/12/2019 6:00:00 PM
End: 3/12/2019 6:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 3/11/2019 2:04:57 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 3/11/2019 8:00:00 PM
End: 3/11/2019 8:30:00 PM
Show Time As: Busy

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 3/12/2019 1:23:47 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: Do you need anything else on this?
Attachments: 19.02.15 - Letter to EPA Air Radiation Division re EtO Air Monitoring in Lake Co.pdf; ATT00001.htm; 18.10.17 0 19-000-0435.pdf; ATT00002.htm; 19.01.29- Duckworth et al to EPA opposing RTR on HCL that undermines ETO risk assessment.pdf; ATT00003.htm; 19.02.13 - IL delegation to Wheeler on Sterigenics national background study.pdf; ATT00004.htm; Meeting with Senator Durbin.updated 3.11.19.v2.docx; ATT00005.htm

Begin forwarded message:

From: "Davis, Alison" <Davis.Alison@epa.gov>
To: "Woods, Clint" <woods.clint@epa.gov>
Subject: Do you need anything else on this?

Deliberative Process / Ex. 5

From: Davis, Alison
Sent: Monday, March 11, 2019 11:49 AM
To: Woods, Clint <woods.Clint@epa.gov>
Subject: RESENDING FW: Meeting with Senator Durbin.updated 3.11.19.v2.docx

Removing "Updating" from the header. Please use this version. Thanks.

From: Davis, Alison
Sent: Monday, March 11, 2019 11:46 AM
To: Woods, Clint <woods.Clint@epa.gov>
Subject: Meeting with Senator Durbin.updated 3.11.19.v2.docx

Hi Clint,
Here you go. R5 provided info on Lake County.
This also references several letters from the Senator on EtO, and says they are attached. They are included here.
-Alison

Congress of the United States

Washington, DC 20510

October 12, 2018

VIA ELECTRONIC DELIVERY

The Honorable Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20004

Dear Acting Administrator Wheeler:

We write in response to a letter we received from Assistant Administrator Bill Wehrum from the U.S. Environmental Protection Agency's (EPA) Office of Air and Radiation dated September 27, 2018.

The Trump Administration has characterized EPA's mission as returning to a "back-to-basics" agenda, which includes achieving clean air. For the residents of Willowbrook, Illinois, who have among the highest cancer risk in the country, reducing exposure to ethylene oxide through fugitive air emissions is critical to this goal.

That is why in addition to the monitoring and testing we called for in our initial note, we request that you direct funds Congress dedicated to help communities identify cancer clusters to DuPage County. Specifically, Congress approved $1 million to fund "Trevor's Law," a provision passed in the *Frank R. Lautenberg Chemical Safety for the 21st Century Act*, to help communities determine whether they are a cancer cluster.

We also request that you provide medical monitoring for community members. In a report that was published earlier this year by the Agency for Toxic Substances and Disease Registry (ATSDR) it was noted that workers in sterilization facilities have an increased risk for breast cancer and lymphohematopoietic cancers. In addition to these cancers, we request EPA launch a health assessment that reviews community cancer rates. EPA should also consider the feasibility of monitoring for potential pre-cancerous or non-cancer impacts such as hemoglobin adducts, DNA damage effects, and hematological effects.

While our first priority remains ensuring DuPage County's public health is safeguarded, we understand EPA is under court-order to update regulations on ethylene oxide and that, in the meantime, communities across the country may be vulnerable. As you work to update this rule, we urge you to ensure the rule protects the health of the most vulnerable—including children and the elderly, directs industry to use the best available technology to control their emissions, and is based on science that is peer-reviewed.

Furthermore, we request that EPA conduct field hearings in communities that are being impacted by ethylene oxide, including in DuPage County, as part of its rulemaking. Field hearings will ensure robust and rigorous public participation. They will also allay fears that EPA is engaging in a regulatory process dominated by industry interests.

We also specifically ask you to:

1. Give our offices a clear timeline of EPA's expected deadlines and next steps as it relates to this rulemaking. We are concerned that EPA is not motivated to work swiftly, and urgently, on updating its National Emission Standards for Hazardous Air Pollutants for ethylene oxide commercial sterilization and fumigation operations. EPA determined at the end of the Obama Administration that ethylene oxide is a known carcinogen, however, since then, EPA has not sought to strengthen the public health standard regulating the gas.

2. Prioritize air monitoring at and around facilities that use ethylene oxide and alert the community when ambient ethylene oxide concentrations are higher than EPA's new safety standard. In EPA's response to us, EPA indicated that it is gathering additional information from facilities using ethylene oxide. We reiterate our request that EPA prioritize monitoring and testing for ethylene oxide, specifically, as part of this effort. This data must be publicly accessible. In addition to public data, communities must be alerted via email or their mobile devices when a monitor detects a leak, or the averaged ambient concentrations are higher than EPA's new safety standard.

   Furthermore, ATSDR's report indicates that, from a comparison of short-term samples to 12 hour samples collected by EPA, there is daily variability in which there are higher emissions from the facility at certain hours. Continuous monitoring is required as the facility is a 24 hour operation, and near-surface concentrations are higher during nighttime than the daytime due to meteorology. Continuous monitoring is the only way to ensure that the emission reductions from pollution controls are effective and long-lasting.

3. Require an inventory of potential exposures for communities adjacent to ethylene oxide sterilization sites. We need to understand which communities are at risk from exposure of ethylene oxide. An inventory of all communities that lie within or are adjacent to facilities that use ethylene oxide will ensure we understand where the hazards exist. This should include an area of at least five miles from the facility in question. This inventory should include all industries that release significant amounts of ethylene oxide, like chemical plants

that make ethylene oxide or have ethylene oxide emissions as a byproduct (*i.e.* facilities that ethyoxylate chemicals).

4. Ensure that staff who will be engaged in the writing of the updated regulation are free from conflicts of interests and commit to using rigors peer-reviewed science. As you know, there are a number of staff at EPA who have previously represented the chemical industry and have worked on ethylene oxide issues, specifically. We request that you direct these staff to sign recusals to ensure that the regulatory process is free of any conflict of interest that would otherwise exist.

Last week EPA published a document titled *A Working Approach for Identifying Potential Candidate Chemicals for Prioritization under the Toxic Substances Control Act (TSCA)*. Our staff are reviewing this document and we will follow up with recommendations on how EPA should consider ethylene oxide under TSCA.

Thank you for your consideration of this request.

Sincerely,

Tammy Duckworth	Richard J. Durbin	Bill Foster
United States Senator	United States Senator	United States Representative

cc. Ms. Cathy Stepp, Region 5 Administrator, U.S. Environmental Protection Agency
cc. The Honorable William Wehrum, Assistant Administrator, Office of Air and Radiation, U.S. Environmental Protection Agency

Congress of the United States

Washington, DC 20510

February 13, 2019

VIA ELECTRONIC DELIVERY

The Honorable Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20004

Dear Acting Administrator Wheeler:

We write to request that you, as Acting Administrator of the U.S. Environmental Protection Agency (EPA), take several steps to protect the community of Willowbrook, Illinois, which is facing a public health threat posed by a Sterigenics sterilization facility.

The Sterigenics facility uses ethylene oxide (EtO), classified as a known carcinogen in 2016, that has been under scrutiny after EPA's National Air Toxics Assessment and a report by the Agency for Toxics Substances and Disease Registry (ATSDR) indicated the community there has an increased cancer risk. Data published last week by EPA indicates that despite installing pollution control equipment high levels of EtO were measured, threatening the health of Willowbrook residents. Last week's data was collected from eight air monitors placed throughout Willowbrook as part of a three-month effort to collect data near the Sterigenics facility to better understand the levels of EtO in the air. The data from these monitors are alarming. In one instance, the EtO detected was 350 times more than the level deemed safe by EPA.

To that end, we request that you direct EPA to do the following:

1. Require an emission audit of Sterigenics, to be conducted by a third-party and unbiased engineering firm;
2. Immediately issue an interim final rule for Sterilizers using your authority under Section 553(b)(B) of the Administrative Procedure Act;
3. Direct the Criminal Enforcement Division at Region 5 to open an investigation into alarming allegations made by former Sterigenics employees in a CBS News article that was published on February 3, 2019[1];
4. Immediately terminate the comment process on EtO's updated risk assessment for regulatory purposes that was buried in EPA's December 20, 2018, Residual Risk and Technology Review (RTR) for Hydrochloric Acid;
5. Investigate whether Sterigenics violated its conditional registration of EtO under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA);
6. Continue ambient air monitoring around Sterigenics, beyond the current 3-month plan, and ensure the results of monitoring are made publicly available; and
7. Commission a Nationwide study on the background levels of EtO.

[1] https://chicago.cbslocal.com/2019/02/03/sterigenics-covered-up-toxic-emissions-operated-secret-plants/

In your response, we request that you provide us with a clear timeline of when you will initiate each of the requests made above and reasonably expect to complete.

Conduct an EtO emission audit at Sterigenics
Sterigenics sterilizes equipment in chambers that are found in two separate buildings. Products are routinely moved in-and-out of these buildings, and we are concerned that, in addition to the emissions from the back-vent, there are other pathways for fugitive EtO emissions. EPA must work with Sterigenics on determining if there are any steps the company can take immediately that will reduce the exposure risk to Willowbrook.

Immediately use authority to publish an interim final rule for Sterilizers
We understand EPA is working on updating its regulations for ethylene oxide and that this process will take time, but the residents of Willowbrook need relief now. That is why we are requesting EPA to immediately publish an interim final rule for sterilizers, which EPA has the authority to do under Section 553(b)(B) of the Administrative Procedure Act and Section 112 of the Clean Air Act. This provision provides that, when an agency for good cause finds that notice and public procedures are impracticable, unnecessary or contrary to the public interest, the agency may issue a rule without providing notice and an opportunity for public comment. Simply put, in extraordinary cases, when harm can be done if action is not immediately taken, EPA must be compelled to act in the public interest without delay. It is evident from the alarming ambient air data published by EPA this week that your Agency would be well within its right to use this authority.

Open a criminal investigation into allegations of misconduct by former employees
We are also concerned that Sterigenics employees have been exposed to undue risk. A CBS News report detailed alarming allegations of misconduct by senior management at this very facility by former employees. Among the allegations made were failure to accurately self-report EtO emissions, improper venting practices, failure to protect workers with respirators and masks and dumping ethylene glycol into public sewage drains. It is critical that you immediately direct your Criminal Enforcement Division to open a criminal investigation into these claims. Doing so will reassure the workers there that they have not been forgotten.

Abandon unprecedented effort to diminish EPA's EtO risk assessment
Two weeks ago, we sent a letter expressing alarm and opposition to EPA's inclusion of EtO in a rulemaking that was published on a separate chemical, Hydrochloric Acid. This rule included a transparent invitation for chemical industries to propose ways to weaken EPA's forthcoming policies meant to protect communities from cancer risk resulting from exposure to EtO. EPA must abandon this comment process and use its own assessment for determining inhalation risk values. Doing otherwise would be a departure and contradiction to the Agency's own longstanding policy.

Investigate Sterigenic's conditional registration of EtO under FIFRA
Furthermore, we are concerned that Sterigenics may have violated the conditions EPA has set upon them under FIFRA. Sterigenics has a conditional registration under FIFRA, which means that the company is subject to specific rules in regards to the use, storage, and disposal of EtO. It

also includes special requirements on personal protective equipment for workers at this facility. Based on the claims made by former employees by the CBS news article, EPA must investigate whether a violation of this law has occurred. If a violation has been found, EPA would have the authority under FIFRA Section 14(a) and 14(b) to pursue civil and criminal action against the Company.

Commission a Nationwide study on the background levels of EtO

Earlier this year, in an effort to undermine EPA's data collection efforts and to cause confusion among community members, Sterigenes initiated a report by Ramboll. This report claimed to have found high levels of EtO throughout the Chicagoland area. Although we do not dispute that there is background levels of EtO in urban areas, we cannot rely on a report commissioned by Sterigenics or the chemical industry to be used to make any scientific determination. In order to settle this debate, we request you to commission a nationwide report to determine what the background level of EtO actually is.

It is time for EPA to move from fact-finding to acting on this public health threat in Willowbrook. We appreciate your attention and timely response to this urgent request.

Sincerely,

Tammy Duckworth
United States Senator

Richard J. Durbin
United States Senator

Sean Casten
United States Representative

Bill Foster
United States Representative

Daniel W. Lipinski
United States Representative

Bradley S. Schneider
United States Representative

Congress of the United States
Washington, DC 20515

February 15, 2019

Mr. Bill Wehrum
Assistant Administrator
Air and Radiation Division
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Assistant Administrator Wehrum:

We write to you to reiterate our concern about the industrial usage of ethylene oxide (EtO) in Lake County, IL, and urge you to begin monitoring for EtO in the communities near Medline Industries, Inc. in Waukegan, IL, and Vantage Specialty Chemicals, Inc. in Gurnee, IL, immediately. As underscored by the deeply alarming data published last week by the U.S. Environmental Protection Agency (EPA) on ambient air levels of EtO in Willowbrook due to the Sterigenics facility, this remains a critical issue to us—and to our constituents who live near facilities that emit EtO.

The divergence between the self-reported emissions data and recently-released ambient air data in Willowbrook makes clear that we cannot rely on self-reported data from EtO-emitting facilities alone to determine the risk local communities face. EPA's monitoring showed that, despite taking significant steps to mitigate fugitive emissions, ambient EtO levels were as high as 350 times the allowable threshold around the Sterigenics facility. As a result, we demand EPA immediately begin ambient air monitoring for the two facilities in Lake County. Our constituents deserve to know more about emissions in their backyard and we see absolutely no reason for further delay.

Although we appreciate that EPA has been working with the two facilities in Lake County that use EtO to assess their emissions levels, we are disappointed the EPA has not yet begun ambient air monitoring in the areas surrounding these facilities. It is essential that EPA provide the local communities with more information—as quickly as possible—about ambient EtO levels. Our constituents deserve greater assurance that the air they breathe is safe.

There are approximately 23,000 constituents living near these facilities—we cannot stress the urgency with which we view this issue. We appreciate your consideration of our

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concerns and expect you to act with the necessary expediency that this situation merits. Please do not hesitate to contact our staff should you have any questions.

Sincerely,

Bradley S. Schneider
Member of Congress

Tammy Duckworth
United States Senator

Lauren Underwood
Member of Congress

Richard J. Durbin
United States Senator

Bloomberg Environment Environment & Energy Report

Sterigenics Head Met Repeatedly With EPA Over Toxic Carcinogen

By Amena H. Saiyid and Abby Smith

Posted March 4, 2019, 3:29 PM

- Sterigenics U.S. LLC head spoke or met at least half a dozen times with EPA air chief since November
- White House also getting involved in how EPA regulating ethylene oxide, a potential carcinogen

The head of Illinois medical sterilizer Sterigenics U.S. LLC has had at least half a dozen conversations with the EPA's top air official, as the agency considers tougher standards for ethylene oxide, a carcinogenic chemical.

Sterigenics has been in the crosshairs of the public and Illinois lawmakers, who have been urging the Environmental Protection Agency to crack down on its facility near Chicago for allegedly releasing too much ethylene oxide.

Sterigenics President Phil Macnabb has had seven phone conversations and at least two in-person meetings with Bill Wehrum, the EPA's assistant administrator for air and radiation, since November.

This is according to Wehrum's publicly available calendar and a more detailed version that Bloomberg Environment obtained under the Freedom of Information Act.

The White House has also gotten involved in this issue. Wehrum's calendar shows that he fielded questions about the chemical from the Office of Management and Budget on Jan. 18, while the government was partially shut down.

Assistant Administrator Bill Wehrum has maintained open lines of communication with Sterigenics "to understand what they're doing, better characterize their emissions, and identify new opportunities for emission controls," an EPA spokeswoman told Bloomberg Environment March 4.

Earlier this month, the Illinois Environmental Protection Agency ordered the company to stop using the chemical after the U.S. EPA's data showed ethylene oxide emissions more than doubled on some days in December compared with earlier monitoring results.

Sixty Times More Carcinogenic

The calendar shows that Macnabb spoke to Wehrum on Oct. 29, then met him on Nov. 13, Nov. 26, and Nov. 29.

Sterigenics was also present at a Nov. 29 public hearing the EPA hosted in Willowbrook, Ill., the site of the Sterigenics facility.

Following the public hearing, Macnabb spoke to Wehrum on Dec. 3, after which the EPA air chief held meetings on Dec. 4 and Dec. 6 with his staff about the Willowbrook samples, which Sterigenics has disputed as inconsistent and erroneous. Macnabb then had a follow up call with Wehrum on Dec. 17.

Sterigenics lobbyists represented by Van Ness Feldman LLP also met with EPA officials in the third and fourth quarters of 2018 to discuss the fate of the chemical, according to lobbying data disclosed by the Senate Office of Public Records.

Three days after Macnabb's Dec. 17 call with Wehrum, the EPA on Dec. 20 decided to seek public comment on a proposal to update the carcinogenic risk posed by ethylene oxide. The agency's national air toxics assessment found that the substance is at least 50 to 60 times more carcinogenic than previously thought.

The call for comment was included in a separate proposal to keep toxic air pollution standards for facilities producing hydrochloric acid, which also emit ethylene oxide.

EPA Accused of Hiding Findings

Sens. Richard Durbin (D-Ill.) and Tammy Duckworth (D-Ill.) have accused the EPA of hiding the ethylene oxide findings in a tangentially related rule.

Wehrum told Bloomberg Environment in December 2018 that the agency could propose the first update to its toxic pollution standards for medical sterilization facilities such as Sterigenics sometime in mid-2019, although he didn't specify a date.

The update would come after the EPA revises its risk assessment for ethylene oxide, which was last updated in 2006.

Macnabb and Michael Petras Jr., chief executive officer of Ohio-based Sotera Health LLC—the parent company of Sterigenics—on Jan. 28 again spoke to Wehrum about ethylene oxide regulation.

This took place two days before Wehrum's meeting with his senior air office staff on ethylene oxide monitoring data.

That meeting included Peter Tsirigotis, director of EPA Office of Air Quality Planning and Standards, Mike Koerber, an EPA associate director for policy who works under Tsirigotis, and Hillary Ward, an environmental protection specialist.

Sterigenics' president "has talked with Mr. Wehrum multiple times given the public concerns EPA has expressed about ethylene oxide and their review of our facility in Willowbrook, IL," Sterigenics spokeswoman Kristin Gibbs said.

Sterigenics was unaware of EPA's request for comment on ethylene oxide in its proposal for facilities that produce hydrochloric acid, Gibbs said.

"We first learned of this request by reading press statements from Members of Congress," she told Bloomberg Environment on March 4.

The nonprofit Moms Clean Air Force is "terribly concerned" with the number of meetings Wehrum has held with Macnabb.

"These are all delaying tactics to delay taking action. It has been known for decades how dangerous it is. Even new science in the last year showing how bad it is," Dominique Browning, co-founder and director of Moms Clean Air Force, told Bloomberg Environment about EPA's plan to update its risk assessment.

To contact the reporters on this story: Amena H. Saiyid in Washington at asaiyid@bloombergenvironment.com; Abby Smith in Washington at asmith@bloombergenvironment.com

To contact the editors responsible for this story: Gregory Henderson at ghenderson@bloombergenvironment.com; Anna Yukhananov at ayukhananov@bloombergenvironment.com; Rob Tricchinelli at rtricchinelli@bloombergenvironment.com

Related Articles

Sterigenics Sues Illinois Over Shutdown Order	(Feb. 19, 2019, 12:27 PM)
Toxic Sterigenics Pollution Prompts Democratic Oversight Bills	(Feb. 13, 2019, 11:49 AM)
Chemical Emissions Spike Near Sterigenics Facility in Illinois	(Feb. 6, 2019, 6:01 AM)
Hidden Sterigenics Chemical Cancer Assessment Worries Democrats (1)	(Jan. 29, 2019, 3:10 PM)

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Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 3/5/2019 1:42:05 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: Call yesterday
Attachments: 11 10 2014 ltr -Aaron Yeow.pdf; ATT00001.htm; AdvaMed EPA EtO Letter.pdf; ATT00002.htm; EO issue brief-FINAL.docx; ATT00003.htm

Begin forwarded message:

From: "Crist, Greg" <GCrist@AdvaMed.org>
Date: March 5, 2019 at 8:40:43 AM EST
To: "Woods, Clint" <woods.clint@epa.gov>
Subject: Call yesterday

Clint,
Thanks for your time yesterday. Very helpful. I welcome the oppty to share what challenges my industry faces on the public health impact as this EtO issue continues to unfold.

Attached are two letters – one sent in 2014 with regard to the IRIS and industry concerns there. We stand by those still today. And second, another letter sent to Administrator Wheeler last year regarding Sterigenics and supply-chain concerns.

Finally, I attach a 2-page issue brief that seeks to capture a brief picture of what industry faces.

Thanks again. greg

Greg Crist
Chief Advocacy Officer, Head of External Affairs
Advanced Medical Technology Association (AdvaMed)
701 Pennsylvania Ave, NW, Suite 800
Washington, DC 20004-2654
P: 202.434.7240
C: 703.887.4078
www.advamed.org
www.lifechanginginnovation.org

AdvaMed
Advanced Medical Technology Association

September 24, 2018

Mr. Andrew Wheeler
Acting Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20004

Dear Acting Administrator Wheeler:

I am writing on behalf of AdvaMed members regarding the U.S. Department of Health and Human Services Agency for Toxic Substances and Disease Registry's Aug. 21 report concerning Sterigenics International Inc. in Willowbrook, Illinois. As you consider responding to the recent report, we ask that you please keep in mind the effect that any long-term disruption of ethylene oxide sterilization would have on patient access to life-changing technology.

AdvaMed is a trade association that represents the world's leading innovators and manufacturers of medical devices, diagnostic products, and health information systems. Together, our members, most with fewer than 100 employees, support nearly 2 million jobs nationwide, produce $150 billion in direct economic output, and manufacture much of the life-enhancing health care technology available in the United States and around the world.

At its core, our industry shares in your mission to protect and advance the human condition, and we support the Agency's mission to ensure safe environments for all Americans. Our members have invested hundreds of millions of dollars to improve workplace safety and environmental health. Through the implementation of new technology, our members have continued to reduce employee exposure and emissions of toxic substances to facilitate compliance with current OSHA and NESHAP regulations. We are equally committed to guaranteeing safe devices for patients, as well as a safe environment for manufacturers' employees and their surrounding communities.

Ethylene oxide (EtO) is critical to ensuring the safety of devices for clinicians and patients, and we understand that EtO's application as a sterilant for health care products accounts for less than 1% of all EtO usage globally. Many of our members

701 Pennsylvania Ave, N.W. | Suite 800 | Washington, D.C. 20004-2654
T – 202.783.8700 | F – 202.783.8750 | AdvaMed.org

manufacture devices that cannot be sterilized by other means due to their complex nature, including pacemakers, implantable defibrillators, and combination products (devices that contain drugs). The Willowbrook Sterigenics facility, like many EtO sterilization process plants, is the sole sterilization facility for a number of medical device types. A disruption in production at this facility would halt sterilization of those products and result in an abrupt stop in the supply chain for those devices. Identifying a different facility, filing for use, and validating sterilization cycles at that facility can take months. This cessation could result in limited access to critical medical technology for millions of patients and lead to poorer health outcomes.

In 2014, AdvaMed expressed concerns to the EPA regarding the Agency's risk estimates of ethylene oxide and the Integrated Risk Information System (IRIS) Evaluation of the Inhalation Carcinogenicity of Ethylene Oxide (revised external draft-August 2014). Along with the American Chemistry Council and the Ethylene Oxide Sterilization Association Inc., we questioned the reliability and accuracy of the assessment and omission of several studies deemed relevant by the Science Advisory Board. It is our understanding that this IRIS assessment is the basis for the concern raised with regard to the Willowbrook Sterigenics facility.

We have the utmost respect for the Agency and know that it will act in the best interest of the environment and all Americans. In doing so, please consider the essential role the Willowbrook Sterigenics facility, and EtO in general, holds in the medical technology supply chain. Closure of this plant could affect access to important devices and thousands of Americans who benefit from medical technology.

Thank you for your attention to this matter

Sincerely,

Scott Whitaker
President & CEO
AdvaMed

CC: US Health & Human Services Secretary Alex Azar
US Food and Drug Administration Commissioner Scott Gottlieb

Message

From: cmsadmin@epa.gov [cmsadmin@epa.gov]
Sent: 3/4/2019 1:12:00 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Cyran, Carissa [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8a903847a9424979b89400688b5c2f5e-Cyran, Carissa]
Subject: CMS For Review - Maria Carroll - AL-19-000-2457

Control AL-19-000-2457 is in your CMS In Box for review. Please go to the CMS webpage to view the details of the control.

Summary Information -
Control Number: AL-19-000-2457
Control Subject: RE: HYDROCHLORIC ACID PRODUCTION RTR AND ETHYLENE OXIDE IRIS ASSESSMENT
From: Duckworth, Tammy; Durbin, Richard J; Lipinski, Daniel; Schneider, Bradley; Foster, Bill; Casten, Sean

Note: This Email was automatically generated. Please do not attempt to respond to it. You can access this control at https://cms.epa.gov/cms. Questions or comments concerning CMS should be directed to CMS Support at 202-564-4985 or CMS Information@epa.gov.

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 3/1/2019 10:07:25 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: FW: IEPA declines to test for eto in Lake Co.

From: Koerber, Mike
Sent: Friday, March 1, 2019 5:02 PM
To: Davis, Alison <Davis.Alison@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>; Mckelvey, Laura <Mckelvey.Laura@epa.gov>; Woods, Clint <woods.Clint@epa.gov>
Subject: Fwd: IEPA declines to test for eto in Lake Co.

Sent from my iPhone

Begin forwarded message:

> **From:** "Newton, Cheryl" <Newton.Cheryl@epa.gov>
> **Date:** March 1, 2019 at 4:55:35 PM EST
> **To:** "Koerber, Mike" <Koerber.Mike@epa.gov>
> **Subject: Fwd: IEPA declines to test for eto in Lake Co.**
>
> Sent from my iPhone
>
> Begin forwarded message:
>
> > **From:** "Rowan, Anne" <rowan.anne@epa.gov>
> > **Date:** March 1, 2019 at 3:49:22 PM CST
> > **To:** "Stepp, Cathy" <stepp.cathy@epa.gov>, "Thiede, Kurt" <thiede.kurt@epa.gov>, "Newton, Cheryl" <Newton.Cheryl@epa.gov>, "Deamer, Eileen" <deamer.eileen@epa.gov>, "Fortin, Denise" <Fortin.Denise@epa.gov>, "Nam, Ed" <nam.ed@epa.gov>, "Furey, Eileen" <furey.eileen@epa.gov>, "Siegel, Kathryn" <siegel.kathryn@epa.gov>, "Nelson, Leverett" <nelson.leverett@epa.gov>
> > **Subject: FW: IEPA declines to test for eto in Lake Co.**
> >
> > https://www.chicagotribune.com/suburbs/lake-county-news-sun/news/ct-lns-iepa-eto-tests-lake-county-st-0302-story.html

Message

From: DeLuca, Isabel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0B021C30CBEE4637A7C7CA683E5E044A-IDELUCA]
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To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Millett, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c067caa6c93544f78c26ab08cc567d27-Millett, John]
Subject: FW: Med Tech Intelligence: CDRH Warns of Potential Device Shortage with Shutdown of Sterigenics Facility in Illinois

FYI

From: Singer, Joshua
Sent: Friday, March 01, 2019 10:04 AM
To: Kelley, Jeff <kelley.jeff@epa.gov>; Rowan, Anne <rowan.anne@epa.gov>; Deamer, Eileen <deamer.eileen@epa.gov>; Nam, Ed <nam.ed@epa.gov>; Furey, Eileen <furey.eileen@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Cain, Alexis <cain.alexis@epa.gov>
Cc: Rountree, Jillian <Rountree.Jillian@epa.gov>
Subject: Med Tech Intelligence: CDRH Warns of Potential Device Shortage with Shutdown of Sterigenics Facility in Illinois

FYI. (CDRH is FDA's Center for Devices and Radiological Health.)

https://www.medtechintelligence.com/news_article/cdrh-warns-of-potential-device-shortage-with-shutdown-of-sterigenics-facility-in-illinois/

CDRH Warns of Potential Device Shortage with Shutdown of Sterigenics Facility in Illinois

By Maria Fontanazza
No Comments

According to the FDA, more than 90% of products sterilized at the facility are medical devices.

Following the Seal Order issued by the Illinois EPA to shutdown Sterigenics operations on February 15, CDRH is alerting medical device manufacturers that there may be a potential impact to device supply. The problem surrounds the shutdown of the Sterigenics facility in Willowbrook, Illinois, which sterilizes products using ethylene oxide (EtO). The Illinois EPA found alarming levels of EtO emissions in the surrounding residential and commercial areas—"2.1 micrograms per meter3 and 9.1 micrograms per meter3, respectively"—according to a news release from the EPA. These emissions have been a significant cause for concern for some time, as discussed in a recent article in the *Chicago Tribune*. EtO is an EPA-classified carcinogen and its emissions have been linked to cancer—most specifically lymphoma, leukemia, and stomach and breast cancer, according to the National Cancer Institute.

How does the Sterigenics facility shutdown affect medical device manufacturers? Approximately 90% of the products sterilized at this particular facility are medical devices, according to the FDA. Although the agency is unaware of medical device shortages connected to this issue, it "believes that more than 100 manufacturers and

hundreds of devices may be affected," according to an FDA statement. It is contacting manufacturers who may be affected by the Sterigenics Willowbrook facility shutdown. CDRH has advised that PMA holders who are affected and plan to use a different facility for product sterilization submit a 180-day site change supplement. 510(k) holders with the same intentions generally do not need to submit a new 510(k), the agency states. In addition, if device manufacturers anticipate a potential device supply shortage, they are urged to report the shortage or supply issue to FDA.

How is Sterigenics responding? The company has called the Illinois EPA's actions "indefensible", stating that it is compliance with all state permits and regulations. "Unilaterally preventing a business that is operating in compliance with all state permits and regulations from carrying out its vital function sets a dangerous precedent. The Illinois EPA's decision will place the health and lives of thousands of patients who rely on the critical medical products sterilized at Willowbrook at risk," according to a Sterigenics statement released on February 15. Sterigenics has released several statements in defense of the recent developments affecting the company facility. In response to an email sent by CBS Chicago investigative reporter Dave Savini, the company called the EPA's air sampling "flawed" and stated that people living in Willowbrook have been misinformed for months about how Sterigenics uses EtO to sterilize medical devices. "EO is the only method approved by the Food and Drug Administration ("FDA") to sterilize millions of critical medical devices. Without sterilization of these devices, individuals needing medical care would face life-threatening infection. By complying with and going above and beyond what the regulations require, the Sterigenics Willowbrook facility safely uses EO and provides a vital service to patients in Illinois and across the country," according to the Sterigenics statement dated February 1.

Message

From: Shaw, Betsy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31CA1476A7674825A131CB2C0D6C88C8-BSHAW03]
Sent: 1/10/2019 2:07:40 AM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Re: Four things

Thanks Bill!

Sent from my iPhone

> On Jan 9, 2019, at 8:04 PM, Wehrum, Bill <Wehrum.Bill@epa.gov> wrote:
>
> Betsy - Nonresponsive Discussion of Personal Matters / Ex. 6
>

Deliberative Process / Ex. 5

>
> Yes, the MSTRS meeting is the only public meeting that I know has been cancelled.
>
> Lastly, I think Delaney and Emily are excellent picks.
>
> _____
> Bill Wehrum
> Assistant Administrator
> Office of Air and Radiation
> U.S. Environmental Protection Agency
> (202) 564-7404
>
>> On Jan 9, 2019, at 3:29 PM, Shaw, Betsy <Shaw.Betsy@epa.gov> wrote:
>>
>> Hi Bill,
>>

Deliberative Process / Ex. 5

>>

Nonresponsive Discussion of Personal Matters / Ex. 6 I continue to work from home this week, calling in to the regular shutdown calls. Just wanted to let you know.
>>
>> Thanks,
>>
>> Betsy
>>
>>
>>
>>
>> Sent from my iPhone

Message

From: Andrea Thome, Author Personal Email / Ex. 6
Sent: 12/19/2018 5:15:27 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Sterigenics

Mr Wehrum,

Attached, please find a letter pertaining to recent information that has come to light about Sterigenics in Willowbrook, IL. I think you'll agree that the immediate and permanent shutdown of this company is long overdue. Will you be the person to do the right thing, since you have the power to shut them down?

Our group of concerned and scared citizens is not going away. We are growing, and in January, we are taking our concerns to the national stage. It would certainly be better for everyone involved if we could have a resolution before it gets that far. This is another stain on the reputation of our state and U.S. government.

Please address this Immediate Public Health Crisis in short order. It's the right thing to do, as I am also sure you are aware.

Sincerely,

Andrea and Jim Thome
Burr Ridge, IL

stopsterigenics.com
fb.com/groups/stopsterigenics/
twitter.com/stopsterigenics
stopsterigenics@gmail.com

December 18, 2018

William Wehrum - Assistant Administrator of the Air and Radiation Department, USEPA
Alec Messina - Director, Illinois EPA
Robert Berlin - DuPage County State's Attorney
Lisa Madigan - Illinois Attorney General

Dear Mr. Wehrum, Mr. Messina, Mr. Berlin and Ms. Madigan,
In 1984 Griffith Laboratories, the original name of the Sterigenics plant, applied for a permit to the Illinois EPA. In a response to their application, the IEPA expressed serious concerns about Ethylene Oxide emissions:

1) The IEPA predicted ambient air levels of Ethylene Oxide as high as 1.130 microgram/cubic meter and as low as .00003 microgram/cubic meter as far as one mile away from the plant.

2) The IEPA referenced a draft of a "USEPA Health Assessment Document" which provided evidence of human cancers of the pancreas, bladder, central nervous system and stomach associated with EtO exposure. The studies showed carcinogenic, mutagenic, leukemogenic and teratogenic effects.

3) The USEPA studies indicate that the highest acceptable ground level concentration of EtO is .007 microgram/cubic meter.

4) While the IEPA indicated that their current rules had not yet been updated to reflect what they now knew about ethylene oxide, they were uncomfortable with issuing the permit. Regardless, we know that the permit was subsequently granted to build the sterilization facility in Willowbrook.

In 2018, ambient air testing by the USEPA and independent air testing by the Village of Willowbrook indicated levels much higher than those originally modeled:

1) USEPA testing revealed EtO levels as high as 0.21 microgram/cubic meter across the street from Sterigenics and .186 microgram/cubic meter at Willow Road Park, .85 miles away.

2) Village of Willowbrook indoor air testing showed EtO levels of .20 microgram/cubic meter in Gower West Elementary School, .45 microgram/cubic meter in Hinsdale South High School and .48 microgram/cubic meter at Gower Middle School

3) Our children are breathing in as much as 64 times the USEPA's recommended ground level concentration.

The USEPA and IEPA claim that they cannot shut down Sterigenics because they need to conduct more studies. The USEPA and IEPA have been conducting studies since 1984 and has known for nearly 35 years that the Sterigenics plant was unsafe and around emit levels exceeding their safety thresholds. We know from our current testing that current air levels exceed safety standards by 64 times in our schools and 867 times in our village hall. How many more years of testing does the USEPA need to be convinced of the danger that our community is being in? How many more people need to become ill? Perhaps the Office of the Inspector General will be able to tell us why the USEPA has been unwilling to act.
Bill Wehrum, USEPA has the authority to order an immediate shutdown through powers granted by the Clean Air Act.
Alec Messina, IEPA has the authority to seal the facility under section 34B of the Illinois Environmental Protection Act.
Robert Berlin, DuPage County States Attorney and Lisa Madigan, Illinois Attorney General have the authority to file an injunction in the courts to shutdown Sterigenics via section 43 of the Illinois Environmental Protection Act.

Who will do their job and protect this community?

The Stop Sterigenics Community

Message

From: Jennifer McConahy Personal Email / Ex. 6
Sent: 12/19/2018 4:14:54 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Sterigenics
Attachments: 12-19 Press Release.pdf; 12-19-18 Reaction to 1984 Document.pdf; second_data_set_foot USEPA.pdf; 1984-07-06-letter-from-IEPA-1.pdf

Mr. Wehrum,

How much longer must we endure exposure to EtO? Clearly the government knew there was a problem 34 years ago, see attachment. You are doing NOTHING to protect our children. The clock started ticking for them when they were in utero and continues now as the levels are high in their schools. The webinar yesterday was not helpful in any way and was just another display of the EPA dodging questions and giving us the dame information over and over again. We would appreciate answers to all the questions we submitted back in November and also yesterday. We would appreciate a response from you in regards to this press release and information.

Jennifer McConahy

Message

From: Janel Featherstone Personal Email / Ex. 6
Sent: 12/19/2018 3:21:44 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Sterigenics

Good Morning,

I am a Willowbrook resident who lives within a mile of Sterigenics. My two children attend the local schools and spend pretty much 24 hours a day within a mile of the facility. After the study was released in August, I felt assured that the EPA would react quickly and the facility would rapidly be shut down due to clear public health risk or at least shut down until safety of the local community could be verified.

You can imagine my distress when even after multiple air studies have clearly demonstrated elevated levels of ETO in the air in the schools and surrounding residential areas the EPA continues to want to study more. Would you want your children to be breathing a Class I carcinogen 24/7 days a week? Guess what? I don't want to live this way either.

DO YOUR JOB!!!!! SHUT IT DOWN!!!! Or maybe let's have all the EPA employees relocate their families to our neighborhood and schools while you decide just how much of a safety risk Sterigenics represents.

Tired of waiting for you to do your job

Janel Featherstone

Appointment

From: Weinstock, Lewis [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DF30E068EFB24A24B35D63BE0596AD9B-LWEINS02]
Sent: 12/4/2018 7:42:32 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Declined: Meeting re: Willowbrook samples
Location: WJC - N 5400 + Video with RTP + Personal Phone / Ex. 6

Start: 12/4/2018 8:30:00 PM
End: 12/4/2018 9:00:00 PM

Recurrence: (none)

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 12/4/2018 12:31:24 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Meeting Forward Notification: Meeting re: Willowbrook samples
Location: WJC - N 5400 + Video with RTP + Personal Phone / Ex. 6

Start: 12/4/2018 8:30:00 PM
End: 12/4/2018 9:00:00 PM

Recurrence: (none)

Your meeting was forwarded

Harlow, David has forwarded your meeting request to additional recipients.

Meeting

Meeting re: Willowbrook samples

Meeting Time

Tuesday, 04 December 2018 15:30-16:00.

Recipients

Harlow, David

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 12/3/2018 2:57:08 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: FW: Willowbrook samples Nov 14-20 - All spreadsheets
Attachments: sample log R5.xlsx; willowbrook sum nov_18.xlsx; willowbrook nov14_20 eto.pdf; willowbrook nov14_20 eto.xls

Clint Woods
Deputy Assistant Administrator
Office of Air and Radiation, U.S. EPA
202.564.6562

From: Koerber, Mike
Sent: Monday, December 3, 2018 9:45 AM
To: Woods, Clint <woods.clint@epa.gov>
Subject: FW: Willowbrook samples Nov 14-20 - All spreadsheets

Clint: This just in! Prior to posting, we will try to set up a quick heads up call with the local elected officials in the next day or so. Also, we are working on appropriate web language that I will share with you when it's ready.

Mike

From: Chen, Xi
Sent: Monday, December 03, 2018 9:00 AM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Shappley, Ned <Shappley.Ned@epa.gov>
Cc: Weinstock, Lewis <Weinstock.Lewis@epa.gov>
Subject: FW: Willowbrook samples Nov 14-20 - All spreadsheets

Hi all,
Please see attached spreadsheet "willowbrook sum nov_18" for the EtO measurement data we got for the first three days of sampling. Note that 19th Nov was the first day of full deployment at all of our 8 sites. Trans-2-butene or cigarette marker 2, 5-dimethylfuran were not detected in any of these samples. Let me know if you have any questions.

Thanks,
Doris

From: Julie Swift <Julie.Swift@erg.com>
Sent: Thursday, November 29, 2018 4:18 PM
To: Chen, Xi <Chen.Xi@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>
Subject: Willowbrook samples Nov 14-20 - All spreadsheets

I have attached finalized reports. I will include all of these files when I provide new reports to you. Please let me know if you would like me to change the summary spreadsheet or the log.

Thank you! Julie

Julie L. Swift
ERG
Office - (919) 468-7924 | Fax - (919) 468-7803
julie.swift@erg.com

From: Julie Swift
Sent: Thursday, November 29, 2018 12:51 PM
To: Chen, Xi <Chen.Xi@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>
Subject: Willowbrook samples Nov 14-20

I have attached the Excel and PDF reports for the first set of samples analyzed at the Willowbrook sites. The data is reported two files, a PDF and XLS report.

All samples received in the lab to date, are reported in the "sample log R5.xlsx" attached file. I will add to this when I send out each report. The first set of duplicates was invalidated and the explanation is outlined in this file.

I am working on the extra summary spreadsheet and will send that to you as soon as it has been QA'd. I should be able to get that sent to you within the next few hours, but thought you would like to see the results now

Please let me know if you have any questions. Thank you! Julie

Julie L. Swift
VP/Program Manager/Chemist
ERG
601 Keystone Park Drive, Suite 700, Morrisville, NC 27560
Office - (919) 468-7924 | Fax - (919) 468-7803
julie.swift@erg.com

Message

From: DeLuca, Isabel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0B021C30CBEE4637A7C7CA683E5E044A-IDELUCA]
Sent: 12/7/2018 2:49:13 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: link to you tube video of Willowbrook meeting

FYI

https://www.youtube.com/watch?v=pkckxPBDn3c&feature=youtu.be

Message

From: Tsirigotis, Peter [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D19C179F3CCB4FADB48E3AE85563F132-PTSIRIGO]
Sent: 11/30/2018 6:39:56 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Re: Sterigenics Meetings

Ok

On Nov 30, 2018, at 12:45 PM, Wehrum, Bill <Wehrum.Bill@epa.gov> wrote:

> I will send another version of my original note with Allison's name correctly spelled. Feel free to forward if you want.
>
> _____
> Bill Wehrum
> Assistant Administrator
> Office of Air and Radiation
> U.S. Environmental Protection Agency
> (202) 564-7404
>
> **From:** Tsirigotis, Peter
> **Sent:** Friday, November 30, 2018 12:31 PM
> **To:** Wehrum, Bill <Wehrum.Bill@epa.gov>
> **Cc:** Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Woods, Clint <woods.Clint@epa.gov>
> **Subject:** Re: Sterigenics Meetings
>
> Thank you Bill. I'll let everyone on the team know how much you appreciate their effort. They will have a good weekend. :)
>
> On Nov 30, 2018, at 11:38 AM, Wehrum, Bill <Wehrum.Bill@epa.gov> wrote:
>
>> Peter – I wanted to let you know that Mike Koerber, Kelly Rimer, Allison David and the rest of the OAQPS team did a terrific job in planning and implementing the Sterigenics events in Willowbrook yesterday. The community obviously remains highly concerned. But, the open house, public meeting, and meetings with elected officials entailed open and frank discussions, without the rancor and disruptions that accompanied the first public meeting. Your team deserve lots of credit here.
>>
>> _____
>> Bill Wehrum
>> Assistant Administrator
>> Office of Air and Radiation
>> U.S. Environmental Protection Agency
>> (202) 564-7404

Message

From: Taylor, Byron F. [bftaylor@sidley.com]
Sent: 11/29/2018 9:21:09 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Macnabb, Philip [PMacnabb@sterigenics.com]; Kathy Hoffman (khoffman@sterigenics.com) [khoffman@sterigenics.com]; tcr@vnf.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=60634a7f78964380838648935cd3d7b1-tcr@vnf.com]
Subject: FW: Sterigenics Willowbrook Facility
Attachments: Letter to Wehrum, Koerber.pdf; Background Summary 11-29-18.pdf; Ethylene Oxide Background Levels.pdf

All: Please see the attached letter, summary document and map regarding background ethylene oxide levels.

Thanks,

BYRON F. TAYLOR

SIDLEY AUSTIN LLP
+1 312 853 4717
bftaylor@sidley.com

****
This e-mail is sent by a law firm and may contain information that is privileged or confidential.
If you are not the intended recipient, please delete the e-mail and any attachments and notify us immediately.

****

RAMBOLL

ENVIRONMENT
& HEALTH

Summary

Chicagoland Background Ethylene Oxide Study

November 29, 2018

Sterigenics U.S. LLC ("Sterigenics") retained Ramboll to conduct testing of background ethylene oxide levels in the Chicagoland area. Sample locations were selected by Ramboll to provide a picture of routine ambient air conditions across the area. The sample locations spanned from Golden Gate Park in the south to Highland Park in the north and from the lake out to LaGrange in the west.

Two different types of samples were collected, 5-minute sample collections (grab samples) and 12-hr sample collections that reflect average conditions over a prolonged period. Samples were collected under the supervision of Ramboll Certified Industrial Hygienists using the standard ambient air collection method known as Summa canisters. Twelve-hour samples were collected in residential backyards where access could be controlled and the canisters could be monitored throughout the collection period. This element of study design was included so that we could be confident samples were not influenced by nearby smokers. Tobacco smoke is a well-known source of ethylene oxide and we wanted to be confident that the results reflected general ambient air conditions and not a local, transient impact from tobacco smoke. Grab samples were included because this allowed for easier sampling of a variety of location types such as parks, parking lots and downtown in the Loop. Samples were collected from 11 different 12-hour locations and 20 different grab sample locations.

In order to be able to address similarities or differences in ambient ethylene oxide levels between day and night, both day and night 12-hour samples were collected at 5 of the locations. Also, grab samples were collected at various times of day from before sunrise, through the day, and after sunset. To document the reliable repeatability of measurements, duplicate samples were collected simultaneously at two of the grab sample locations and during one of the 12-hr sample collections. This resulted in a total of 39 samples collected between 12-23 October 2018.

All samples were analysed by a nationally certified laboratory using EPA Method TO-15 refined to eliminate potential interference from trans-2-butene when measuring ethylene oxide. The effectiveness of this method was verified by having the laboratory include known mixtures of trans-2-butene, acetaldehyde and other chemicals with ethylene oxide in quality control tests and documenting that each chemical could be identified and measured separately. The results for ethylene oxide that we have presented are accurate and are not affected by interference from other chemicals.

To verify that the samples we collected were not reflective of ethylene oxide from nearby tobacco combustion, the laboratory also analysed all samples for another chemical that is a known characteristic marker for tobacco smoke (2,5-dimethylfuran). The tobacco smoke marker was not present in any sample.

The results that we have presented represent background levels of ethylene oxide from general and routine ambient air conditions in urban and suburban areas around Chicago.

Ramboll 10150 Highland Manor Drive, Suite 440, Tampa, FL 33610
V +1 813.628.4325

ramboll.com

Ethylene Oxide Grab Sample Locations

Sample Station	Description	Wind Speed/ Direction (mph)
Grb-1	Highland Park shopping plaza parking lot	calm
Grb-2	Gallery Park	3-5, NW
Grb-3	Morton Grove shopping plaza parking lot	2, SSW
Grb-4	Elk Grove Village parking lot	1, NNW
Grb-5	Forest Glen commercial parking lot	1,WSW
Grb-6	Elmwood Park Metra Station	6, NW
Grb-7	Wicker Park commercial parking lot	calm
Grb-8	Eisenhower Expwy & Mannheim Rd	0-3, NW
Grb-9	Rush University Medical Center park	0-2, NW
Grb-10	UIC campus park	0-6, NW
Grb-11	Guaranteed Rate Field - parking lot	0-8, NNW
Grb-12	Hindsdale Oasis - Tri-State Toll Rd.	2-4, SSW
Grb-13	Midway Airport	0-3, NNW
Grb-14	S. Cicero & 75th - parking lot	4-6, NW
Grb-15	Chicago Ridge parking lot	4-8, W
Grb-16	Chicago State University park	0-3, W
Grb-17	Golden Gate Park	0-3, W
Grb-18	Advocate Lutheran General Hospital	0-3, SW
Grb-19	Loop commercial area sidewalk	0-8, W
Grb-20	Skokie Hospital	2-7, NNW

All results in $\mu g/m^3$

* - Estimated value between detection limit and sample reporting limit

Samples collected 12-23 October 2018.

MAP: OpenStreetMap.

Ethylene Oxide 12-Hour Average Sample Locations

Sample Station	Description	Wind Speed/ Direction begin/end
12hr-1	Evanston - suburban backyard	calm calm
12hr-2	Lincolnwood detached home backyard	calm 2, W
12hr-3	Winnetka - suburban backyard	2, W calm
12hr-4	Urban low-rise backyard	Day: calm 0-1, N Night: 9, WNW 3, WNW
12hr-5	Deerfield - suburban backyard	calm 2, SW
12hr-6	Detached home across from Golden Gate Park	0-1, NW calm
12hr-7	Park Ridge detached home backyard	Day: calm calm Night: calm calm
12hr-8	Belmont Gardens semi-urban backyard	Day: calm calm Night: calm 10, S
12hr-9	Brookfield suburban backyard	Day: calm 3-5, W Night: calm calm
12hr-10	Bucktown semi-urban backyard	calm calm
12hr-11	Worth residential backyard	Day: 0-3, NW calm Night: calm calm

All results in $\mu g/m^3$

9066

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November 29, 2018

PRIVILEGED AND CONFIDENTIAL

William L. Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail code: 6101A
Washington, DC 20460
wehrum.bill@epa.gov

Michael Koerber
Associate Director for Policy
Office of Air and Radiation
U.S. Environmental Protection Agency
4930 Old Page Road
RTP, Mail Code C401F
Durham, NC 27703
koerber.Mike@epa.gov

Re: Sterigenics Willowbrook Facility

Dear Mr. Wehrum and Mr. Koerber:

As you are aware, Sterigenics U.S. LLC arranged for a study of background ethylene oxide levels in the Chicagoland ambient air. Attached is a summary of the effort and a map showing the measured ethylene oxide levels, the locations and wind speeds/directions. Please let us know if you have questions.

Very truly yours,

Byron F. Taylor

Attachments

cc: Clint Woods (woods.clint@epa.gov)

Sidley Austin LLP is a limited liability partnership practicing in affiliation with other Sidley Austin partnerships.

Message

From: Macnabb, Philip [PMacnabb@sterigenics.com]
Sent: 11/29/2018 9:01:25 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; tcr@vnf.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=60634a7f78964380838648935cd3d7b1-tcr@vnf.com]
Subject: Re: [EXTERNAL] Re: Sterigenics Visit

Bill/Clint

I know you just left, but I just saw the detailed agenda for this evening and I notice that you have allocated 10min for a "Stop Sterigenics" representative to present. This is very concerning to me. I did not think this was supposed to be an avenue for this group to state their case. I thought it was for you all to disseminate information.

In light of this can you at least have our statement read. This does not feel very balanced.

Thanks

Phil

Sent from my iPhone

On Nov 29, 2018, at 10:51 AM, Woods, Clint <woods.clint@epa.gov> wrote:

> **CAUTION:** This email originated from outside of the organization. **DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe.

One update - The facilitator will refer to the statement and copies will be made available. Sorry for the confusion

On Nov 29, 2018, at 10:39 AM, Woods, Clint <woods.clint@epa.gov> wrote:

> The facilitator will read - Thanks!
>
> On Nov 29, 2018, at 10:11 AM, Macnabb, Philip <PMacnabb@sterigenics.com> wrote:
>
> > Thanks Clint
> >
> > Here is the statement we would like read at the Forum. Who will actually read this statement?
> >
> > **Philip Macnabb**
> > **President**
> > Sterigenics, A Sotera Health company
> > 2015 Spring Rd, Suite 650
> > Oak Brook, IL 60523

pmacnabb@sterigenics.com
www.sterigenics.com
O: (630) 928-1733
<image003.jpg>

From: Woods, Clint [mailto:woods.clint@epa.gov]
Sent: Wednesday, November 28, 2018 11:09 AM
To: Macnabb, Philip
Cc: Wehrum, Bill; Koerber, Mike; tcr@vnf.com
Subject: Re: Sterigenics Visit

Phil,

You're right on the statement for the community meeting, and I believe Mike Koerber has been in touch with Kathy Hoffman. I think we need to be back to Ashton Place ahead of 3:00 on Thursday.

Thanks!

Clint

On Nov 28, 2018, at 10:16 AM, Macnabb, Philip <PMacnabb@sterigenics.com> wrote:

> Bill/Clint
>
> Mike spoke to Kathy Hoffman yesterday and explained that the open house will be limited to gov't and regulatory groups so that we will not need to plan to participate. We understand and will adjust accordingly. If you receive any questions whereby you need some data or information from us to answer, please let us know and we will help out the best we can.
>
> Also, on our call Monday, Clint offered the option of a statement that we could submit for the evening session, is that still an option? If so we would like to provide one to you and assume that you would want that by midday tomorrow?
>
> Finally, I believe we are confirmed for a site visit for you both on Thursday at 1pm. I was wondering how much time you have so that I can know how to set up your visit. I believe that your priority is the see the process and understand our emission controls set up. If you have other expectations, please let me know.

My cell phone is (919) 996-9590 if you need to reach me during your travels for any reason.

Have a safe trip.

Thank you

Philip Macnabb
President
Sterigenics, A Sotera Health company
2015 Spring Rd, Suite 650
Oak Brook, IL 60523
pmacnabb@sterigenics.com
www.sterigenics.com
O: (630) 928-1733
<image002.jpg>

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<Sterigenics Willowbrook Town Hall Statement 11.29.18.pdf>

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Message

From: Macnabb, Philip [PMacnabb@sterigenics.com]
Sent: 11/29/2018 6:46:42 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; tcr@vnf.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=60634a7f78964380838648935cd3d7b1-tcr@vnf.com]
Subject: RE: Sterigenics Visit

No problem, We will be here.

Reminder on the address:

7775 South Quincy St.
Willowbrook, IL 60527

Philip Macnabb
President
Sterigenics, A Sotera Health company
2015 Spring Rd, Suite 650
Oak Brook, IL 60523
pmacnabb@sterigenics.com
www.sterigenics.com
O: (630) 928-1733

Sterigenics®
A Sotera Health company

From: Wehrum, Bill [mailto:Wehrum.Bill@epa.gov]
Sent: Thursday, November 29, 2018 12:45 PM
To: Macnabb, Philip
Cc: Woods, Clint; Koerber, Mike; tcr@vnf.com
Subject: [EXTERNAL] Re: Sterigenics Visit

CAUTION: This email originated from outside of the organization. **DO NOT CLICK** links or attachments unless you recognize the sender and know the content is safe.

Hi Phil. Our meeting ran a bit long. Will will be a few minutes late to the facility. See you soon.

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency

(202) 564-7404

On Nov 29, 2018, at 10:11 AM, Macnabb, Philip <PMacnabb@sterigenics.com> wrote:

Thanks Clint

Here is the statement we would like read at the Forum. Who will actually read this statement?

Philip Macnabb
President
Sterigenics, A Sotera Health company
2015 Spring Rd, Suite 650
Oak Brook, IL 60523
pmacnabb@sterigenics.com
www.sterigenics.com
O: (630) 928-1733
<image003.jpg>

From: Woods, Clint [mailto:woods.clint@epa.gov]
Sent: Wednesday, November 28, 2018 11:09 AM
To: Macnabb, Philip
Cc: Wehrum, Bill; Koerber, Mike; tcr@vnf.com
Subject: Re: Sterigenics Visit

Phil,

You're right on the statement for the community meeting, and I believe Mike Koerber has been in touch with Kathy Hoffman. I think we need to be back to Ashton Place ahead of 3:00 on Thursday.

Thanks!

Clint

On Nov 28, 2018, at 10:16 AM, Macnabb, Philip <PMacnabb@sterigenics.com> wrote:

Bill/Clint

Mike spoke to Kathy Hoffman yesterday and explained that the open house will be limited to gov't and regulatory groups so that we will not need to plan to participate. We understand and will adjust accordingly. If you receive any questions whereby you need some data or information from us to answer, please let us know and we will help out the best we can.

Also, on our call Monday, Clint offered the option of a statement that we could submit for the evening session, is that still an option? If so we would like to provide one to you and assume that you would want that by midday tomorrow?

Finally, I believe we are confirmed for a site visit for you both on Thursday at 1pm. I was wondering how much time you have so that I can know how to set up your visit. I believe that your priority is the see the process and understand our emission controls set up. If you have other expectations, please let me know.

My cell phone is Personal Phone / Ex. 6 if you need to reach me during your travels for any reason.

Have a safe trip.

Thank you

Philip Macnabb
President
Sterigenics, A Sotera Health company
2015 Spring Rd, Suite 650
Oak Brook, IL 60523
pmacnabb@sterigenics.com
www.sterigenics.com
O: (630) 928-1733
<image002.jpg>

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<Sterigenics Willowbrook Town Hall Statement 11.29.18.pdf>

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Sterigenics Statement to the Willowbrook Community

Willowbrook, IL – November 29, 2018

Thank you for the opportunity to address the members of the Willowbrook community regarding Sterigenics' operations in Willowbrook and to reiterate our commitment to taking a leadership role in evolving regulations to reassure the community that it is safe.

Since 1984, our Willowbrook facility has been sterilizing critical medical devices and products that patients and hospitals around the world rely on for life-saving procedures. Our operations are guided by our commitment to safety. We understand our responsibility in the safe handling of ethylene oxide ("EO") and we take that responsibility very seriously. We follow rigorous safety protocols at our Willowbrook facility and at all of our facilities, to protect our employees, the communities in which we work and live, the environment, and the patients we serve. We operate in compliance with health and safety rules, have voluntarily reported our emissions levels to regulators and have continually challenged ourselves to improve and upgrade our operations and outperform what the rules require.

On August 21, 2018, the Agency for Toxic Substances and Disease Registry ("ATSDR") released a report that touched off months of confusion, political fear mongering, lawsuits, and even threats of violence against our Sterigenics employees. Despite the fact that the report has now been rendered invalid based on the EPA's acknowledgement that the test samples were flawed, Sterigenics and the Willowbrook community have been unfairly stigmatized.

As citizens, you deserve the facts, and this meeting is an important step in a fact-based discussion on EO and safety.

The fact is that EO is in the air all around us. It is the product of natural and man-made sources, and is produced by the human body's normal metabolic processes. Sterigenics recently commissioned an independent scientific testing firm to measure EO levels across Chicagoland. EO was found in 38 of the 39 samples taken across 31 locations, from the Loop and Guaranteed Rate Park to the northern, southern and western suburbs. The results are not surprising, given that EO is produced by many sources. The important point is that EO levels in the air around Willowbrook and across the Chicagoland area are very small - measured in parts per billion – but they are not zero because of the multitude of natural and man-made sources that produce EO.

It is also important to note that, based on the EO measurements found across Chicagoland, which are consistent with levels found across the U.S., all the test samples which captured EO would have failed the "risk" standard relied upon by the ATSDR report– not because the air is unsafe, but because the ATSDR standard is illogical.

The system has failed the citizens of Willowbrook by allowing flawed data measured against an illogical standard to be accepted as fact. The real travesty has been the needless fear and worry about safety that good people of Willowbrook have had to wrongly endure.

Overlooked in all of this is the fact that companies like Sterigenics have voluntarily invested millions of dollars in emissions control systems and processes to ensure public safety. Independent tests confirm that these systems are working, enabling Sterigenics to capture and control more than 99.9 percent of

the EO used at the Willowbrook facility before its conversion for safe reuse. In other words, less than one-tenth of 1% of EO used is released into atmosphere – one of the highest control levels in the country for the industry.

By safely using EO in compliance with and better than regulations require, the Sterigenics Willowbrook facility serves patients in Illinois and across the country. EO is the only method approved by the Food and Drug Administration ("FDA") to sterilize millions of critical medical devices –methods like hydrogen peroxide, gamma radiation and others simply cannot achieve the stringent sterilization standards set by the FDA, at the scale required to meet the demand for these critical products and devices. A disruption in production would halt sterilization, negatively impacting public health in Illinois and beyond.

Sterigenics is committed to our mission, Safeguarding Global Health. We thank you for this opportunity to present our view and we stand ready to work with officials to evolve regulations in the continued interest of public safety. But safety and good public policy demand that we slow the rush to judgment and base the discussion about EO on facts.

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Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 11/28/2018 4:27:04 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Meeting Forward Notification: NATA briefing for Lake County Elected Officials
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM

Recurrence: (none)

Your meeting was forwarded

Harlow, David has forwarded your meeting request to additional recipients.

Meeting

NATA briefing for Lake County Elected Officials

Meeting Time

Wednesday, 28 November 2018 15:00-16:00.

Recipients

Harlow, David

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 2/28/2019 9:57:19 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: 'Macnabb, Philip (PMacnabb@sterigenics.com)' [PMacnabb@sterigenics.com]
Subject: FDA Announcement: Impact on Medical Supplies of Sterigenics' Willowbrook Shutdown
Attachments: sterigenics - fda news release feb 27 19.DOCX

Bill / Cliff – I wanted to make sure you were aware of this.

Let me know if you have any questions. Thanks.

Tom Roberts | Partner
Van Ness Feldman LLP

1050 Thomas Jefferson Street, NW
Washington, DC 20007
(202) 298-1930 (o) | (202) 365-7750 (c) | tcr@vnf.com | vnf.com

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U.S. FOOD & DRUG ADMINISTRATION

CDRH Message: Medical Devices Supply Issue and Potential Shortages as Sterigenics Willowbrook Product Sterilization Facility Ceases Operations

Supply issues can lead to shortages of medical devices—and can pose a threat to public health by delaying or disrupting critical care for patients. Mitigating product supply issues and working to prevent patient harm from device shortages are important to the U.S. Food and Drug Administration (FDA).

The FDA's Center for Devices and Radiological Health (CDRH) is aware that on February 15, 2019, the Illinois Environmental Protection Agency (EPA) issued a Seal Order to stop the Sterigenics facility in Willowbrook, Illinois, from sterilizing medical products and other products with ethylene oxide. Learn more about the Environmental Protection Agency's assessment of Sterigenics Willowbrook Facility on EPA.gov.

Medical devices account for over 90 percent of the products that the Sterigenics Willowbrook facility sterilizes. The FDA is reaching out to medical device manufacturers to understand which manufacturers are affected by the cessation of operations at this sterilization facility. At this time, the FDA believes that more than 100 manufacturers and hundreds of devices may be affected.

Currently, the FDA is not aware of any device shortages. In case of a potential shortage, the FDA identifies strategies that will limit or mitigate patient impact due to device supply interruptions. The FDA also reaches out to device manufacturers who might not be affected by an issue to determine their availability to ramp up production and potentially mitigate a shortage.

Report Sterilization Site Changes to the FDA

- **Premarket Approval (PMA) Holders:** If you are a PMA holder affected by the cessation of operations at the Sterigenic's Willowbrook facility and you are planning to use an alternative facility to sterilize your products, you should submit a 180-day site change supplement. However, the FDA intends to review such PMA supplements within 30 days. The FDA recently issued the final guidance, Manufacturing Site Change Supplements: Content and Submission, that PMA holders can refer to for more information about site change supplements. If you have questions about your

PMA device or need help with submitting a site change supplement, contact CDRHPremarketProgramOperations@fda.hhs.gov.

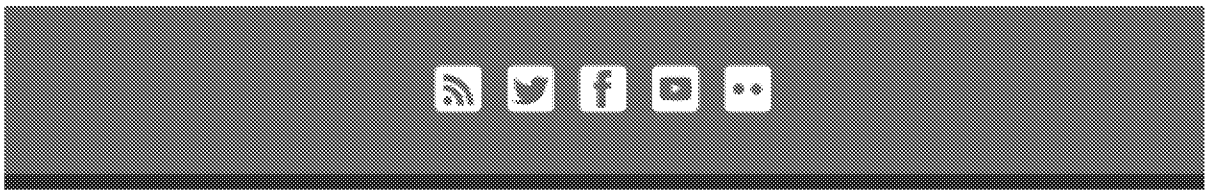
- **510(k) Holders:** If you are a 510(k) holder affected by the Sterigenic's Willowbrook facility shutdown and you are planning to use an alternative ethylene oxide sterilization facility, submitting a new 510(k) is typically not required. You should document qualification activities supporting this change in your internal files. However, the FDA recommends that affected 510(k) holders refer to the FDA's guidance, Deciding When to Submit a 510(k) for a Change to an Existing Device: Guidance for Industry and Food and Drug Administration Staff when determining if a new 510(k) is required.

Report a Medical Product Supply Issue or Shortage

Planning for and preventing device supply shortages is an important responsibility. The FDA can help anticipate, prevent or mitigate future shortages by working with device manufacturers that voluntarily provide us with information on potential product supply issues. Learn more about how to report a medical product shortage or supply issue.

Questions?

If you have questions about medical device supply issues or shortages, contact Deviceshortages@fda.hhs.gov.



U.S. Food and Drug Administration
10903 New Hampshire Avenue, Silver Spring, MD 20993
1-888-INFO-FDA (1-888-463-6332)

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 11/27/2018 9:45:46 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Meeting Forward Notification: NATA briefing for Lake County Elected Officials
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM

Recurrence: (none)

Your meeting was forwarded

Nam, Ed has forwarded your meeting request to additional recipients.

Meeting

NATA briefing for Lake County Elected Officials

Meeting Time

Wednesday, 28 November 2018 15:00-16:00.

Recipients

Payne, James

Thiede, Kurt

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Message

From: Annette Ciolek Personal Email / Ex. 6
Sent: 12/20/2018 12:05:34 AM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Shut Sterigenics DOWN!

I am a very concerned resident of Willowbrook, IL. The results are in for the air testing for ethylene oxide in Willowbrook and Burr Ridge. Ethylene oxide is in our air, our schools and our homes in high levels. From what I've been told, the EPA plans on doing additional testing over the next 3 months. This is completely unacceptable to our community. We are NOT lab rats. People are sick and dying. People who are not sick or dying are at much greater risk of being sick in the future than the general population. It is unconscionable that we should have to endure even one more day of ethylene oxide exposure. We have already unknowingly been poisoned for the last 34 years. Mr. Wehrum, at the EPA Webinar the other day, you urged us to "establish trust" with Sterigenics. Seriously? This company has completely breached the trust of this community. They have shown again and again that they have a complete disregard for our safety. And now a letter comes to light from 1984 which proves that not only the Illinois EPA but Sterigenics knew of the risk to our community when they began spewing it into our air in 1984. We will settle for nothing less than the complete cessation of ethylene oxide use in our community. Ethylene oxide is carcinogenic at ANY level. There are alternate methods of sterilizing medical equipment, as the prestigious Northwestern Hospital recently implemented.

We, the residents of Willowbrook and the surrounding communities demand that a public health crisis be declared. The EPA and the Illinois EPA should have all the information they need at this point. Let me ask you, how quickly would you act if your own family lived in Willowbrook? We need your help and we need it NOW.

Thank you for your prompt attention to his urgent matter.

Annette Ciolek
Willowbrook, IL resident

Message

From: Julia Krumplis Personal Email / Ex. 6
Sent: 12/19/2018 8:37:50 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Since 1984

Dear Mr. Wehrum,

We now know that there is currently EtO in the air in our parks, schools and neighborhoods. We also now know that the dangers of EtO have been known since at lest 1984. I have included a link the the Stop Sterigenics press release and open letter below.

Why has the Sterigenics plant not yet been shot down? We know enough today right now to do the only moral thing, which is to shut the plant down immediately today. I dread to think of how much damage has been done since 1984 and I shudder to think of all those who will still get sick because of what has been as already happened. That we now both the incredible toxicity of this chemical and that it is being released into the air everyday, it is found in our air and yet nothing has been changed since August to make the people living around the plant one bit safer-- this is immorality which rattles my soul. That this in know and nothing has changed to protect the people in 4 month is utterly inexcusable and and unacceptable. We do not need more test, analysis, or discussions of any sort, we need action! We know enough to justify action in rational caring person's mind.

I'm calling on you to demonstrate leadership, morality, and courage, and shutter this plant once and for all. We are counting on you, the families of Willowbrook, Darien, Burr Ridge. You are the top air guy at the EPA. This our air. It is hurting people everyday! Please do your job and protect us from another molecule of this nightmare substance. This is an emergency.

When can we except action which will actually project and make us safer?

Sincerely,
Julia

Stop Sterigenics | Blog

[redacted]

Stop Sterigenics | Blog

It is our mission to secure the safety of our communities by eliminating the emission of ethylene oxide, a group...

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 11/27/2018 4:50:34 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Meeting Forward Notification: NATA briefing for Lake County Elected Officials
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM

Recurrence: (none)

Your meeting was forwarded

Fortin, Denise has forwarded your meeting request to additional recipients.

Meeting

NATA briefing for Lake County Elected Officials

Meeting Time

Wednesday, November 28, 2018 3:00 PM-4:00 PM.

Recipients

Deamer, Eileen

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 11/27/2018 4:19:09 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Meeting Forward Notification: NATA briefing for Lake County Elected Officials
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM

Recurrence: (none)

Your meeting was forwarded

Deamer, Eileen has forwarded your meeting request to additional recipients.

Meeting

NATA briefing for Lake County Elected Officials

Meeting Time

Wednesday, 28 November 2018 15:00-16:00.

Recipients

Nam, Ed

Kelley, Jeff

Siegel, Kathryn

Cain, Alexis

Fortin, Denise

Engelmann, Robert

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Message

From: DeLuca, Isabel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0B021C30CBEE4637A7C7CA683E5E044A-IDELUCA]
Sent: 11/27/2018 4:10:47 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Millett, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c067caa6c93544f78c26ab08cc567d27-Millett, John]
Subject: FW: Sterigenics Comments On EPA's Statement Regarding Inaccurate Willowbrook Air Test Results
Attachments: Sterigenics+Statement+on+EPA+Flawed+Test+Results+11.26.18.pdf

Hi all,
I'm guessing you may have gotten this statement from Sterigenics directly from John Konkus, but if not, see attached.

Thanks,
Isabel

Sterigenics.

STERIGENICS COMMENTS ON EPA'S STATEMENT REGARDING INACCURATE WILLOWBROOK AIR TEST RESULTS

EPA Disclosure Invalidates ATSDR Report; Clearly Reveals Report was Based on Flawed Data

Chicago, IL November 26, 2018 – Sterigenics (the "Company") today provided the following statement in response to the United States Environmental Protection Agency's ("EPA") disclosure regarding flaws in EPA Region 5's air quality monitoring prior to October 2018. In its disclosure, the EPA revealed that the Region 5 test results "may have shown higher concentrations of ethylene oxide ("EO") than were actually in the air." Specifically, the EPA's test results did not distinguish between Trans-2 butene ("TTB") and EO and accordingly, the data is invalid. TTB can be released by the burning of fossil fuels and is a common component of vehicle exhaust, which is prevalent along I-55, the high traffic corridor near which the Willowbrook facility is located.

"This new EPA disclosure also invalidates the Agency for Toxic Substances and Disease Registry ("ATSDR") report, which was already questioned by experts. The EPA's flawed samples were the same samples from which the ATDSR selectively chose data as the basis for its August report.

"Now we know the controversy regarding our Willowbrook facility was created by a study that was based on flawed air samples. Unfortunately, the flawed report has needlessly created fear in the hearts of Willowbrook residents, stigmatized the community and caused good people to wrongly worry about a facility that operates safely and performs a critical service to our health care system.

"It's time to slow the rush to judgment. Citizens deserve the facts. Sterigenics remains committed to working with officials in support of evolving regulations and providing the facts to the community to reassure everyone that our facility operates safely."

For additional information on this matter visit www.sterigenicswillowbrook.com

About Sterigenics: Sterigenics is a global leader in mission-critical sterilization solutions and expert advisory services. Its 1,600 engineers, scientists and safety specialists provide deep expertise in gamma, EO, Ebeam and X-ray sterilization technologies for the medical device, pharmaceutical, food and commercial safety, and high-performance materials industries. Its network of 47 facilities in 13 countries put its services close to customers' production and distribution points, ensuring it is the "point of safe" for customers around the world.

###

For more information, please contact: media@sterigenics.com

2015 Spring Road Ste 650 Oak Brook, IL 60523

630.928.1700 | sterigenics.com

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 11/27/2018 12:52:51 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: Sterigenics Comments On EPA's Statement Regarding Inaccurate Willowbrook Air Test Results
Attachments: Sterigenics+Statement+on+EPA+Flawed+Test+Results+11.26.18.pdf; ATT00001.htm

Begin forwarded message:

From: "Koerber, Mike" <Koerber.Mike@epa.gov>
Date: November 27, 2018 at 7:51:36 AM EST
To: "Woods, Clint" <woods.clint@epa.gov>
Subject: FW: Sterigenics Comments On EPA's Statement Regarding Inaccurate Willowbrook Air Test Results

In case you haven't seen this....

From: Davis, Alison
Sent: Monday, November 26, 2018 7:01 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>
Subject: Fwd: Sterigenics Comments On EPA's Statement Regarding Inaccurate Willowbrook Air Test Results

I encourage you to read the attachment

Sent from my iPhone

Begin forwarded message:

From: "Grantham, Nancy" <Grantham.Nancy@epa.gov>
Date: November 26, 2018 at 6:23:38 PM EST
To: "Davis, Alison" <Davis.Alison@epa.gov>, "Millett, John" <Millett.John@epa.gov>, "DeLuca, Isabel" <DeLuca.Isabel@epa.gov>, "Konkus, John" <konkus.john@epa.gov>, "Block, Molly" <block.molly@epa.gov>
Subject: FW: Sterigenics Comments On EPA's Statement Regarding Inaccurate Willowbrook Air Test Results

Nancy Grantham
Office of Public Affairs
US Environmental Protection Agency
202-564-6879 (desk)
202-253-7056 (mobile)

From: Kelley, Jeff
Sent: Monday, November 26, 2018 6:22 PM

To: Grantham, Nancy <Grantham.Nancy@epa.gov>; Nam, Ed <nam.ed@epa.gov>; Thiede, Kurt <thiede.kurt@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Singer, Joshua <Singer.Joshua@epa.gov>; Rowan, Anne <rowan.anne@epa.gov>
Subject: Sterigenics Comments On EPA's Statement Regarding Inaccurate Willowbrook Air Test Results

In case you haven't seen ...

Jeff Kelley
Director, Office of External Communications
U.S. EPA Region 5
ph: 312-353-1159

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 11/21/2018 9:13:10 AM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: draft web language about EtO interference issue

FYI

Begin forwarded message:

From: "Woods, Clint" <woods.clint@epa.gov>
Date: November 20, 2018 at 6:10:46 PM EST
To: "Davis, Alison" <Davis.Alison@epa.gov>
Cc: "Koerber, Mike" <Koerber.Mike@epa.gov>, "Rimer, Kelly" <Rimer.Kelly@epa.gov>
Subject: RE: draft web language about EtO interference issue

A few edits below

From: Davis, Alison
Sent: Tuesday, November 20, 2018 4:53 PM
To: Woods, Clint <woods.clint@epa.gov>
Cc: Koerber, Mike <Koerber.Mike@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>
Subject: draft web language about EtO interference issue

Clint,
Here is some draft language for your review. We could post this soon – after we make a few heads up calls. We would like to raise this on the meeting planning call tomorrow – it will be a good opportunity to flag it for public officials. Please let me know your thoughts on that. Thanks .

DRAFT

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

VILLAGE OF WILLOWBROOK
EST. 1960

Willowbrook

835 Midway Drive
Willowbrook, IL 60527-5549

Phone: (630) 323-8215 Fax: (630) 323-0787 www.willowbrookil.org

Mayor

Frank A. Trilla

Village Clerk

Leroy R. Hansen

Village Trustees

Sue Berglund

Umberto Davi

Terrence Kelly

Michael Mistele

Gayle Neal

Paul Oggerino

Village Administrator

Tim Halik

Chief of Police

Robert Schaller

Director of Finance

Carrie Dittman

Proud Member of the
Illinois Route 66 Scenic Byway

December 11, 2018

SENT VIA E-MAIL AND USPS

Matthew J. Dunn, Chief, Environmental Enforcement/Asbestos Litigation
Elizabeth Wallace, Chief, Environmental Bureau
Illinois Attorney General's Office
500 South Second Street
Springfield, IL 62706

Lisa A. Smith, Assistant State's Attorney
DuPage County State's Attorney's Office
503 N. County Farm Road
Wheaton, Illinois 60187

Re: Village of Willowbrook

Dear Mr. Dunn, Ms. Wallace and Ms. Smith:

Let me begin by thanking all of you for your efforts on behalf of the residents of the Village of Willowbrook. The Village and its residents truly appreciate all that you have done, and continue to do, to protect human health and the environment in and around the Willowbrook area. As you know, the Village has assembled a Task Force of experts to help review and understand the vast amounts of data and information publicly available dealing with ethylene oxide (EtO) and the emissions of EtO from the operation of the Sterigenics facilities located in Willowbrook. Just as the Task Force is focusing on understanding the information that is publicly available, as I know you can appreciate, the Task Force is also focusing on what we do not know about EtO and the operations at the Sterigenics facilities. Indeed, the Village continues to work on how we can address the gaps in information so we can provide answers to our resident about any risks they may face living, working and recreating near the facilities. To this end, this letter presents you with data we have collected during the Village's own air monitoring program and also presents some recommendations we ask you to please consider.

The Village's Air Monitoring Program

On November 16 and 17, 2018, our air quality consultant, GHD, Inc. (GHD), performed ethylene oxide (EtO) air sampling at discrete locations within the Village of Willowbrook. The sampling performed included both indoor and outdoor air sampling. Many factors went into selecting the locations for

sampling including proximity to the Sterigenics facilities, differing types of indoor space occupation, and a technical assessment of air emissions and how they disperse under existing conditions. GHD also selected a location that represents background—that is, a location where the air quality professionals have determined that no impact from Sterigenics facilities' emissions is expected. The testing involved the use of SUMMA Canisters over a 24-hour period. For the indoor sampling, air samples were collected at breathing zone height and in the school locations, samples were taken at several heights, including desk height. During the testing, GHD documented atmospheric conditions, temperature, humidity as well as the general use and conditions of the buildings selected for indoor air sampling. GHD collected 24-hour indoor and outdoor samples totaling 34 samples at 11 locations within the Village.

For your information I attach to this letter a copy of the Air Testing Report issued by GHD, Inc. Although the EtO levels identified through our monitoring program were 5 to 10 times lower than those levels identified by the USEPA in May of 2018, our measured levels of EtO inside the buildings were found to be higher than outside the buildings, with the lone exception of the Village Hall. The Village's results are also noteworthy when they are compared to the initial results from USEPA's Air Monitoring Program released on December 7, 2018. More specifically, both the Village and USEPA were testing on November 16 with differing results. USEPA also had a sample result collected on November 19 from its monitor outside the Village Hall that was **magnitudes higher than any of the Village's result from its sampling on November 16 and 17, 2018.** Our consultants will discuss these results with USEPA to address the discrepancies but discrepancies aside, even this single sample result of 6.21 ug/m^3 is of great concern to the Village (and in fact, EPA had similar high outdoor results at the EPA warehouse). The sample results are even more troubling when you consider that Sterigenics claims to now control emissions of EtO at over 90%.

Out of the abundance of caution, the Village, at its own expense again, will perform 30-day indoor monitoring at the Village Hall and Police Building beginning as soon as possible. In addition to the Village's action, we strongly believe that the residents have a right to know whether operations at the Sterigenics facilities fluctuate at a greater degree than originally expected and whether regulators truly understand the range of operating scenarios legally achievable by Sterigenics under its operating permits. We believe the first round of sampling results coupled with the Village's results tell us we do not truly know the EtO emission profile of these facilities, how those emissions may interact with meteorology and indoor spaces, and most importantly, what levels of EtO exist on any given day in the ambient air around our Village. **Because of this, we ask that the state and county seek immediately an interim order requiring that Sterigenics shut down its Willowbrook facilities until such time as the USEPA, state, county and Village can determine why such high levels of EtO were detected on November 19.**

Stack Testing at the Sterigenics Facilities

One of the Village's Task Force members has over 40 year of experience in the industry dealing with pollution control technologies and stack testing at major facilities nationwide. The Stack Test Reports (and revised reports) released by Sterigenics were reviewed by Mr. Paul Farber

and a follow up discussion with air experts at Illinois EPA took place roughly two weeks ago. Based upon Mr. Farber's review and discussions with Illinois EPA, the Village asks both the Illinois Attorney General's Office and DuPage County State's Attorney's Office, together with Illinois EPA, to consider the following:

1. We are told that the in-house, possibly voluntary, operating procedures requires that only one sterilization chamber be venting to a scrubber at a time and only one sterilization chamber can be open at a time releasing its backvent emissions to the emissions control system. The stack test performed at each facility only tested under this operating scenario. We think it is prudent to ask Sterigenics to demonstrate that there is a legal requirement for limiting Sterigenics to operate in this way. If there is no legal requirement limiting Sterigenics operations in this way, and a temporary shut down is not pursued, we recommend that such a condition be placed on Sterigenics now through an interim order. The operating permits for the facilities should then be revised to include such a condition or should contain a condition that limits stack emissions based upon this one chamber scenario, as tested. We believe this is especially critical when we see such varying results from USEPA's air monitoring (i.e., at the Village Hall .824 ug/m^3 on November 16 and 6.21 ug/m^3 at the same location on November 19).[1]

2. Since there still remains much confusion about Sterigenics actual total EtO emissions, both on an annual and 24-hour basis, we agree with Illinois EPA that stack tests at each facility measuring total emissions of EtO be performed as soon as possible. The previous stack tests performed by Sterigenics only measured one of their emission sources under restricted conditions. Again, the Village believes this is critical in light of the release by USEPA of its first round of sampling results. The Village also believes that if a temporary shutdown is not pursued, continuous air emission monitors measuring EtO stack emissions should be installed as USEPA continues to study fugitive emissions. If it is fugitive emissions that are then causing the high sample results, then the Village absolutely believes more aggressive action is warranted.

I am sure we need not tell you that USEPA's results have causes a level of increased fear in the community. Just consider the following action taken by Gower School District, announced on Friday:

Although it may be premature to draw conclusions related to the most recent data posted by the EPA, District Officials will re-route buses, effective immediately and using Willowbrook Center Parkway exclusively, to bypass the area at which ethylene oxide has been detected (Quincy St. and Midway Dr.). The current information from the EPA may not support a claim of an immediate health risk to our students or our drivers, but it is enough to support a decision being made out of an abundance of caution. We expect to learn

[1] We also note that USEPA's air monitoring program is also looking most specifically at fugitive emissions from the facility. We think that regulators should be especially concerned if the cause of the high readings are due, in large part, to fugitives.

more and will respond accordingly as the EPA continues its monitoring of the area and carries out a full risk assessment in our community.

Such action by the School District cannot be faulted, and there is no question that it will likely cause a ripple effect due to the continued concern in the community that meaningful action will not be taken.

The Village stands ready to assist both the Illinois Attorney General's Office and DuPage County State's Attorney's Office in any way the Village can to support action needed to protect the residents of Willowbrook and surrounding area.

Sincerely,

VILLAGE OF WILLOWBROOK

Frank A. Trilla

Frank A. Trilla
Mayor

cc: Cathy Stepp, Regional Administrator, USEPA Region 5
Alec Messina, Director, IEPA
Daniel Lipinski, Member of Congress

FAT/rc

Press Release

WILLOWBROOK RELEASES INDEPENDENT AIR MONITORING REPORT

Results Raise New Questions About Air Quality and Public Safety;
Mayor Demands Immediate Shut Down of Sterigenics Facilities

Willowbrook, IL, Dec. 12, 2018—New independent indoor/outdoor air monitoring to test for the presence of ethylene oxide (EtO) in Willowbrook, along with the U.S. EPA's November 19, 2018 test results release, prompted Mayor Frank Trilla to issue a new request to immediately shut down the Sterigenics Willowbrook facilities.

GHD Services, Inc. (GHD), hired by the Village to test levels of EtO produced by Sterigenics, issued a report showing EtO levels lower than U.S. EPA's testing results from earlier in the year. However, indoor readings were generally found to be higher than outdoor levels.

Trilla said the uncertainty of levels of EtO and varying test results prompted him, on December 11, 2018, to send a letter to the offices of the Illinois Attorney General and DuPage State's Attorney renewing his request for an immediate shut down.

"There is nothing more important than health and safety of our residents," said Mayor Frank Trilla. "Since we continue to have more questions than answers, I am demanding an immediate shut down of the Sterigenics facilities until we can be assured the air quality in Willowbrook is absolutely safe and there is no risk for our residents. The Willowbrook facilities should cease operations until such time as the U.S. EPA, state, county and Village can determine why such high levels of EtO were detected by the U.S. EPA on November 19th."

Out of an abundance of caution and at GHD's recommendation, the Village, at its own expense, will seek to perform additional 30-day indoor monitoring at the Village Hall and Police Building as soon as possible.

The full GHD report and letter to the state and county can be found on the village website (www.willowbrookil.org)

###

Local Contact:

Tim Halik
Village Administrator
630-920-2261 office
thalik@willowbrook.il.us

Message

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 11/9/2018 9:59:22 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]
Subject: Tuesday's calendar
Attachments: Wehrum Bill Calendar.ics

Hi Bill –

Please find your Tuesday calendar below. Note that today's call with Jeff Lautt was moved to 9am on Tuesday. Also, motorpool to the White House leaves at 10am, yet your meeting with Phil runs till 10:15, so you may want to take a cab over. Motorpool will bring you back at noon, and your 12:30 is across the street from EPA.

Tue, Nov 13

	All Day	CWD: Emily Atkinson
	All Day	On Leave: Kati Stevens
	Before 8:00 AM	**Free**
	8:00 AM – 9:00 AM	**Free**
	9:00 AM – 9:30 AM	Call with Jeff Lautt from POET
	9:30 AM – 10:15 AM	Meeting with Phil MacNabb re: Sterigenics (CONFIRMED)
	10:00 AM – 10:30 AM	Motorpool booked
	10:30 AM – 11:00 AM	SAFE Vehicles Preparation Meeting
	11:00 AM – 11:30 AM	WAVES submitted
	11:00 AM – 12:00 PM	SAFE Vehicles rule discussion
	12:00 PM – 12:30 PM	Motorpool Booked
	12:30 PM – 1:45 PM	Truck and Engine Manufacturers Association Diesel Technology Forum (EMA/DTF) Public Policy Forum Speech (Confirmed)
	1:00 PM – 2:00 PM	Delegated to Clint woods and David Harlow: Regulatory Reform Task Force
	1:45 PM – 2:15 PM	Wal to 1001 Pennsylvania Avenue, NW to EPA
	2:00 PM – 3:00 PM	Senior Staff Meeting
	3:00 PM – 4:30 PM	Cleaner Trucks Initiative
	3:00 PM – 4:30 PM	Delegated to Betsy Shaw: OAR Business Review
	4:30 PM – 5:00 PM	Book Motorpool to USDA
	4:30 PM – 5:00 PM	Meeting with Ingevity Corporation
	5:00 PM – 5:45 PM	Meeting at USDA with Sec. Perdue re: RFS
	After 5:45 PM	**Free**

Have a great weekend!

Delaney Rakosnik
Staff Assistant

Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-0935
Email: rakosnik.delaney@epa.gov

Appointment

From: Gunasekara, Mandy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=53D1A3CAA8BB4EBAB8A2D28CA59B6F45-GUNASEKARA,]
Sent: 10/29/2018 3:54:20 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Declined: Phone call with Phil Macnabb re: Sterigenics (confirmed)
Location: WJC - N 5400 + Personal Privacy / Ex. 6

Start: 10/29/2018 8:00:00 PM
End: 10/29/2018 8:30:00 PM

Recurrence: (none)

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 10/25/2018 1:13:48 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]
Subject: Fwd: Letter to AA Wheeler regarding Ethylene Oxide emissions in Lake County
Attachments: image001.png; ATT00001.htm; image002.png; ATT00002.htm; image003.png; ATT00003.htm; image004.png; ATT00004.htm; image005.png; ATT00005.htm; EPA Lake County EtO Ltr.pdf; ATT00006.htm

Begin forwarded message:

From: "Palich, Christian" <palich.christian@epa.gov>
Date: October 25, 2018 at 9:12:27 AM EDT
To: "Woods, Clint" <woods.clint@epa.gov>
Cc: "Frye, Tony (Robert)" <frye.robert@epa.gov>, "Ringel, Aaron" <ringel.aaron@epa.gov>, "Lyons, Troy" <lyons.troy@epa.gov>, "Rodrick, Christian" <rodrick.christian@epa.gov>
Subject: FW: Letter to AA Wheeler regarding Ethylene Oxide emissions in Lake County

Hi Clint,

See attached from both IL Senators and Congressman Schneider.

Christian R. Palich
Deputy Associate Administrator
Office of Congressional & Intergovernmental Affairs
U.S Environmental Protection Agency
O: 202.564.4944
C: 202.306.4656
E: Palich.Christian@epa.gov

From: Hunt, Jasmine (Durbin) [mailto:Jasmine_Hunt@durbin.senate.gov]
Sent: Wednesday, October 24, 2018 5:03 PM
To: Palich, Christian <palich.christian@epa.gov>; Lyons, Troy <lyons.troy@epa.gov>
Cc: Adhar, Radha (Duckworth) <Radha_Adhar@duckworth.senate.gov>; 'Brown, Tommy' <Tommy.Brown@mail.house.gov>; Mazzuca, Gina (Durbin) <Gina_Mazzuca@durbin.senate.gov>
Subject: Letter to AA Wheeler regarding Ethylene Oxide emissions in Lake County

Hi Troy & Christian:

Could you pass this letter on to the appropriate person?

Thanks

Jasmine Hunt

Office of Senator Richard J. Durbin | Democratic Whip
711 Senate Hart Office Building | ☎ 202.224.2152 | 🖷 202.224.0400
✉ jasmine_hunt@durbin.senate.gov

Congress of the United States

Washington, DC 20510

October 25, 2018

The Honorable Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington D.C. 20004

Dear Acting Administrator Andrew Wheeler:

We write to request the U.S. Environmental Protection Agency (EPA) perform an in-depth investigation of ethylene oxide (EtO) emissions at two facilities in Lake County, Illinois—Medline Industries, Inc. in Waukegan and Vantage Specialty Chemicals, Inc. in Gurnee.

The National Air Toxics Assessment (NATA) is a critical public health tool that EPA and other agencies use to identify sources of pollution and potential risks to public health. Since the release of the 2014 NATA, EPA has worked to address public concern about increased cancer risks in DuPage County due to EtO emissions from the Sterigenics facility in Willowbrook. The same assessment identified EtO emissions from the Medline and Vantage facilities as possibly leading to increased cancer risk in the Lake County area. Given this discovery, we request the EPA work with the Illinois Environmental Protection Agency to:

- Conduct ambient air monitoring and stack tests to identify any emissions from the Medline and Vantage facilities and determine whether these facilities are in compliance with existing Clean Air Act (CAA) regulations.
- Guarantee both companies are taking the necessary steps to limit EtO emissions using any available pollution control technologies, as the Sterigenics facility did;
- Make all test data publicly available and hold a public meeting to assure residents that steps are being taken to mitigate the EtO exposure in Lake County; and
- Publish the threshold public health standard EPA will use to determine if the fugitive EtO emissions from Vantage Specialty Chemicals, Inc. or Medline Industries, Inc. exceed levels that science deems safe.

In addition, we urge EPA to publish a timeline for when it will revise the current CAA EtO standards to limit future emission are limited to a level deemed safe by the 2016 Agency for Toxic Substances and Disease Registry and 2014 NATA reports. These recent reports have shown that the existing standards need to be lowered to protect public health in communities across the county.

Thank you for considering our requests, and we look forward to your response.

Sincerely

RICHARD J. DURBIN	TAMMY DUCKWORTH	BRADLEY S. SCHNEIDER
United States Senator	United States Senator	United States Representative

Sterigenics.
A Sotera Health company

September 27, 2018

Mr. Alec Messina
Director
Illinois Environmental Protection Agency (IL-EPA)
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794-9276

Re: Sterigenics U.S., LLC Permit # 95120085

Dear Mr. Messina:

As requested in your September 25, 2018 letter, Sterigenics is providing the final results from the recent stack tests at our Willowbrook facilities to the Illinois EPA. Stack testing was conducted at the Sterigenics Willowbrook 1 and Willowbrook 2 facilities on September 20 and 21, 2018 to test the recent equipment upgrades that control the backvent process emissions. The two-day testing was conducted by a third-party, independent tester and witnessed by representatives from the IL-EPA, U.S. Environmental Protection Agency (EPA), Tri-State Fire Department and the Village of Willowbrook.

The final test results for the Willowbrook 1 and 2 facilities are summarized in the attached two tables. The test results show that all test measurements taken in the outlets of the two emissions control systems were below the detection limit of the stack testing measurement equipment. These tests were taken while the sterilization chamber back vents were exhausting to the emission controls. Using the determined quantification limit of the measurement equipment, control efficiencies were calculated to be 99.6061 and 99.5606 for the Willowbrook 1 and 2 facilities, respectively.

The final reports for these stack tests are underway and should be complete soon.

If you have any questions, please feel free to contact me.

Regards,

KA Hoffman

Kathleen Hoffman
SVP, Global EH&S and Technical Services

2015 Spring Road Ste 650 Oak Brook, IL 60523
630.928.1700 | sterigenics.com

TABLE 1
ETHYLENE OXIDE CONTROL EFFICIENCY – BACKVENT OF AN ETHYLENE OXIDE EMISSION CONTROL DEVICE OPERATED BY STERIGENICS, INC. IN WILLOWBROOK, ILLINOIS (PLANT 1) ON SEPTEMBER 21, 2018

RUN NUMBER	INJECTION TIME	INLET ETO CONC. (PPM)[1]	OUTLET ETO CONC. (PPM)[2]	ETO CONTROL EFFICIENCY
1[3]	914	11.5	<0.10 (ND[4])	99.1304
1	915	542	<.0.10 (ND)	99.9815
1	916	38.9	<0.10 (ND)	99.7429
1	917	34.5	<0.10 (ND)	99.7101
1	918	27.6	<0.10 (ND)	99.6377
1	919	26.8	<0.10 (ND)	99.6269
1	920	27.0	<0.10 (ND)	99.6296
1	921	23.1	<0.10 (ND)	99.5671
1	923	25.4	<0.10 (ND)	99.6063
1	924	24.0	<0.10 (ND)	99.5833
1	925	23.7	<0.10 (ND)	99.5781
1	926	23.5	<0.10 (ND)	99.5745
1	927	23.2	<0.10 (ND)	99.5690
2[5]	931	24.0	<0.10 (ND)	99.5833
2	932	22.5	<0.10 (ND)	99.5556
2	933	42.3	<0.10 (ND)	99.7636
2	934	31.3	<0.10 (ND)	99.6805
2	935	28.8	<0.10 (ND)	99.6528
2	936	28.7	<0.10 (ND)	99.6516
2	937	28.5	<0.10 (ND)	99.6491
2	939	26.7	<0.10 (ND)	99.6255
2	940	26.8	<0.10 (ND)	99.6269
2	941	26.4	<0.10 (ND)	99.6212
2	942	26.9	<0.10 (ND)	99.6283
2	943	25.0	<0.10 (ND)	99.6000
2	944	25.2	<0.10 (ND)	99.6032
3[6]	953	23.1	<0.10 (ND)	99.5671
3	954	22.8	<0.10 (ND)	99.5614
3	955	27.8	<0.10 (ND)	99.6403
3	956	26.0	<0.10 (ND)	99.6154
3	957	23.8	<0.10 (ND)	99.5798
3	958	23.0	<0.10 (ND)	99.5652
3	1000	22.3	<0.10 (ND)	99.5516
3	1001	22.8	<0.10 (ND)	99.5614
3	1002	22.8	<0.10 (ND)	99.5614
3	1003	23.4	<0.10 (ND)	99.5726
3	1004	21.7	<0.10 (ND)	99.5392
3	1006	21.7	<0.10 (ND)	99.5392
TIME-WEIGHTED AVERAGE:		**39.36**	**0.1000**	**99.6061**

REQUIRED CONTROL EFFICIENCY: 99%

[1] PPM = parts per million by volume
[2] 0.10 ppm is the quantification limit for the detector used at the outlet
[3] Backvent Phase Test Run #1 started at 9:13, ended at 9:28.
[4] ND = Below Detection Limit
[5] Backvent Phase Test Run #2 started at 9:30, ended at 9:45.
[6] Backvent Phase Test Run #3 started at 9:52, ended at 10:07.

TABLE 1
ETHYLENE OXIDE CONTROL EFFICIENCY – BACKVENT OF AN ETHYLENE OXIDE EMISSION CONTROL DEVICE OPERATED BY STERIGENICS, INC. IN WILLOWBROOK, ILLINOIS (PLANT 2) ON SEPTEMBER 20, 2018

RUN NUMBER	INJECTION TIME	INLET ETO CONC. (PPM)[1]	OUTLET ETO CONC. (PPM)[2]	ETO CONTROL EFFICIENCY
1[3]	1539	7.94	<0.10 (ND[4])	98.7406
1	1540	8.41	<.0.10 (ND)	98.8109
1	1541	213	<0.10 (ND)	99.9531
1	1542	30.4	<0.10 (ND)	99.6711
1	1544	22.3	<0.10 (ND)	99.5516
1	1545	22.2	<0.10 (ND)	99.5495
1	1546	21.8	<0.10 (ND)	99.5413
1	1547	19.7	<0.10 (ND)	99.4924
1	1548	18.8	<0.10 (ND)	99.4681
1	1549	20.3	<0.10 (ND)	99.5074
1	1550	19.3	<0.10 (ND)	99.4819
1	1552	19.8	<0.10 (ND)	99.4949
2[5]	1617	13.0	<0.10 (ND)	99.2308
2	1618	545	<0.10 (ND)	99.9817
2	1619	50.0	<0.10 (ND)	99.8000
2	1620	22.0	<0.10 (ND)	99.5455
2	1621	22.8	<0.10 (ND)	99.5614
2	1622	19.7	<0.10 (ND)	99.4924
2	1623	20.0	<0.10 (ND)	99.5000
2	1625	20.5	<0.10 (ND)	99.5122
2	1626	19.8	<0.10 (ND)	99.4949
2	1627	19.5	<0.10 (ND)	99.4872
2	1628	21.3	<0.10 (ND)	99.5305
2	1629	19.4	<0.10 (ND)	99.4845
2	1630	19.7	<0.10 (ND)	99.4924
3[6]	1651	20.6	<0.10 (ND)	99.5146
3	1652	246	<0.10 (ND)	99.9593
3	1653	40.1	<0.10 (ND)	99.7506
3	1654	34.2	<0.10 (ND)	99.7076
3	1655	30.8	<0.10 (ND)	99.6753
3	1657	31.6	<0.10 (ND)	99.6835
3	1658	33.1	<0.10 (ND)	99.6979
3	1659	31.5	<0.10 (ND)	99.6825
3	1700	31.8	<0.10 (ND)	99.6855
3	1701	29.4	<0.10 (ND)	99.6599
3	1703	31.5	<0.10 (ND)	99.6825
3	1704	30.1	<0.10 (ND)	99.6678
TIME-WEIGHTED AVERAGE:		**49.39**	**0.1000**	**99.5606**

REQUIRED CONTROL EFFICIENCY: 99%

[1] PPM = parts per million by volume
[2] 0.10 ppm is the quantification limit for the detector used at the outlet.
[3] Backvent Phase Test Run #1 started at 15:38, ended at 15:53.
[4] ND = Below Detection Limit
[5] Backvent Phase Test Run #2 started at 16:16, ended at 16:31.
[6] Backvent Phase Test Run #3 started at 16:50, ended at 17:05.

Appointment

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 9/26/2018 6:02:50 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]

Subject: Follow up on EtO and Willowbrook
Location: Call in: 2 **Personal Privacy / Ex. 6**

Start: 9/26/2018 8:00:00 PM
End: 9/26/2018 8:30:00 PM
Show Time As: Tentative

TO: Clint Woods, Jennifer Orme-Zavaleta, Kelly Rimer, Louis D'Amico

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 9/25/2018 8:34:08 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Meeting Forward Notification: Meeting re: Willowbrook
Location: WJC - N 5400

Start: 9/26/2018 2:00:00 PM
End: 9/26/2018 2:30:00 PM

Recurrence: (none)

Your meeting was forwarded

Woods, Clint has forwarded your meeting request to additional recipients.

Meeting

Meeting re: Willowbrook

Meeting Time

Wednesday, September 26, 2018 10:00 AM-10:30 AM.

Recipients

Cory, Preston (Katherine)

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 9/25/2018 5:25:56 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Meeting Forward Notification: Meeting re: Willowbrook
Location: WJC - N 5400

Start: 9/26/2018 2:00:00 PM
End: 9/26/2018 2:30:00 PM

Recurrence: (none)

Your meeting was forwarded

Williams, Felicia has forwarded your meeting request to additional recipients.

Meeting

Meeting re: Willowbrook

Meeting Time

Wednesday, 26 September 2018 10:00-10:30.

Recipients

Payne, James

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Appointment

From: Stepp, Cathy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BEFDAFC0FA1A425EAE232F60AD9BDA1D-STEPP, CATH]
Sent: 9/21/2018 7:50:40 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Declined: Meeting re: Willowbrook
Location: WJC - N 5400

Start: 9/26/2018 4:00:00 PM
End: 9/26/2018 4:30:00 PM

Recurrence: (none)

Message

From: Personal Email / Ex. 6
Sent: 12/10/2018 9:53:13 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Sterigenics

Dear Mr. Wehrum,

I live a half mile from the Sterigenics facility in Willowbrook IL. I was diagnosed with breast cancer three years ago at age 52. I implore you to declare a Public Health Crisis and to utilize your Emergency Powers, granted by the Clean Air Act to shutdown Sterigenics immediately. Testing has confirmed fugitive Ethylene Oxide emissions with no evidence of Trans 2 Butene. The risk of cancer is real!

I would appreciate a personal response.

Kathleen Mis

Personal Privacy / Ex. 6

•

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 9/27/2018 4:55:11 PM
To: Kelley, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e154fa5a5f744c70aa3da58e3f87aabe-JKelley]
CC: Stepp, Cathy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=befdafc0fa1a425eae232f60ad9bda1d-Stepp, Cath]; Lyons, Troy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=15e4881c95044ab49c6c35a0f5eef67e-Lyons, Troy]; Grantham, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=12a3c2ed7158417fb0bb1b1b72a8cfb0-Grantham, Nancy]; Konkus, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=555471b2baa6419e8e141696f4577062-Konkus, Joh]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Jackson, Ryan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=38bc8e18791a47d88a279db2fec8bd60-Jackson, Ry]; Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]; Thiede, Kurt [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc09fac5acc4ce1ba689fb2ce70d459-Thiede, Kur]; Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: Re: Draft response to letters

Thanks - I think the AG's office may be another one not on our current list

On Sep 27, 2018, at 12:52 PM, Kelley, Jeff <kelley.jeff@epa.gov> wrote:

> Yes, we can provide contact information for all of them. Will pull together and send shortly.
>
> ---
> ***Jeff Kelley***
> *Director, Office of External Communications*
> *U.S. EPA Region 5*
> *ph: 312-353-1159*
>
> ---
>
> **From:** Woods, Clint
> **Sent:** Thursday, September 27, 2018 11:52 AM
> **To:** Kelley, Jeff <kelley.jeff@epa.gov>
> **Cc:** Stepp, Cathy <stepp.cathy@epa.gov>; Lyons, Troy <lyons.troy@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Konkus, John <konkus.john@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>; Jackson, Ryan <jackson.ryan@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Thiede, Kurt <thiede.kurt@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
> **Subject:** Re: Draft response to letters
>
> If we need OAR responses to these, can OCIR or R5 help with contact info?
>
> On Sep 27, 2018, at 12:38 PM, Kelley, Jeff <kelley.jeff@epa.gov> wrote:

We found a couple others … not sure which of these should receive this response:

- Letter from Rep. Lipinski to Acting Administrator Wheeler (attached)
- Letter from Illinois Rep. Jim Durkin to the Regional Administrator
- Letter from City of Darien, Ill., to R5 Air Division
- Email from the Village of Willowbrook to R5 Air Division
- Email from DuPage County Board to R5 Air Division

Jeff Kelley
Director, Office of External Communications
U.S. EPA Region 5
ph: 312-353-1159

From: Stepp, Cathy
Sent: Thursday, September 27, 2018 10:06 AM
To: Kelley, Jeff <kelley.jeff@epa.gov>
Subject: Fwd: Draft response to letters

Let them know as soon as possible if we need to include more people on this list

Sent from my iPhone

Begin forwarded message:

> **From:** "Lyons, Troy" <lyons.troy@epa.gov>
> **Date:** September 27, 2018 at 11:05:12 AM EDT
> **To:** "Grantham, Nancy" <Grantham.Nancy@epa.gov>, "Woods, Clint" <woods.clint@epa.gov>, "Wehrum, Bill" <Wehrum.Bill@epa.gov>
> **Cc:** "Konkus, John" <konkus.john@epa.gov>, "Jackson, Ryan" <jackson.ryan@epa.gov>, "Gunasekara, Mandy" <Gunasekara.Mandy@epa.gov>, "Stepp, Cathy" <stepp.cathy@epa.gov>, "Thiede, Kurt" <thiede.kurt@epa.gov>
> **Subject: RE: Draft response to letters**
>
> We need to send three letters addressed to:
>
> 1. Senator Tammy Duckworth, Senator Richard Durbin, Congressman Bill Foster
> 2. Governor Bruce Rauner
> 3. Congressman Peter Roskam
>
> ---
>
> **From:** Grantham, Nancy
> **Sent:** Thursday, September 27, 2018 10:49 AM
> **To:** Lyons, Troy <lyons.troy@epa.gov>; Woods, Clint <woods.clint@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>
> **Cc:** Konkus, John <konkus.john@epa.gov>; Jackson, Ryan <jackson.ryan@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Stepp, Cathy <stepp.cathy@epa.gov>; Thiede, Kurt <thiede.kurt@epa.gov>
> **Subject:** RE: Draft response to letters

Deliberative Process / Ex. 5

Nancy Grantham
Office of Public Affairs
US Environmental Protection Agency
202-564-6879 (desk)
202-253-7056 (mobile)

From: Lyons, Troy
Sent: Thursday, September 27, 2018 10:41 AM
To: Woods, Clint <woods.clint@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>
Cc: Konkus, John <konkus.john@epa.gov>; Jackson, Ryan <jackson.ryan@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Stepp, Cathy <stepp.cathy@epa.gov>; Thiede, Kurt <thiede.kurt@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>
Subject: RE: Draft response to letters

Good on my end.

OPA if you and OAR have no additional edits, let's get it teed up for Bill's signature. OCIR will send to the appropriate Congressional contacts.

From: Woods, Clint
Sent: Thursday, September 27, 2018 10:27 AM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>; Lyons, Troy <lyons.troy@epa.gov>
Cc: Konkus, John <konkus.john@epa.gov>; Jackson, Ryan <jackson.ryan@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Stepp, Cathy <stepp.cathy@epa.gov>; Thiede, Kurt <thiede.kurt@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>
Subject: RE: Draft response to letters

Sorry for the trouble – This version contains latest on monitoring.
Thanks!

From: Woods, Clint
Sent: Thursday, September 27, 2018 10:03 AM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>; Lyons, Troy <lyons.troy@epa.gov>
Cc: Konkus, John <konkus.john@epa.gov>; Jackson, Ryan <jackson.ryan@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Stepp, Cathy <stepp.cathy@epa.gov>; Thiede, Kurt <thiede.kurt@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>
Subject: RE: Draft response to letters

Updated draft attached – We're double checking a couple items but should be good to get this out to requestors this morning.

From: Wehrum, Bill
Sent: Wednesday, September 26, 2018 6:39 PM
To: Lyons, Troy <lyons.troy@epa.gov>
Cc: Konkus, John <konkus.john@epa.gov>; Jackson, Ryan <jackson.ryan@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Woods, Clint <woods.clint@epa.gov>; Stepp, Cathy <stepp.cathy@epa.gov>; Thiede, Kurt <thiede.kurt@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>
Subject: Re: Draft response to letters

I'm coming back to the office from an off site meeting. I suspect all of our support staff are gone. Is first thing in the morning soon enough?

_____
Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

On Sep 26, 2018, at 6:36 PM, Lyons, Troy <lyons.troy@epa.gov> wrote:

> Apologies—I missed Clint's earlier draft letter. I am reviewing now
>
> ---
>
> **From:** Wehrum, Bill
> **Sent:** Wednesday, September 26, 2018 6:35 PM
> **To:** Lyons, Troy <lyons.troy@epa.gov>
> **Cc:** Konkus, John <konkus.john@epa.gov>; Jackson, Ryan <jackson.ryan@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Woods, Clint <woods.clint@epa.gov>; Stepp, Cathy <stepp.cathy@epa.gov>; Thiede, Kurt <thiede.kurt@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>
> **Subject:** Re: Draft response to letters
>
> Yes.
>
> _____
> Bill Wehrum
> Assistant Administrator
> Office of Air and Radiation
> U.S. Environmental Protection Agency
> (202) 564-7404
>
> On Sep 26, 2018, at 5:51 PM, Lyons, Troy <lyons.troy@epa.gov> wrote:

Yes, I think a letter should come from Bill.

OAR—could you turn around a letter for us to send to all of the elected who have engaged us?

From: Konkus, John
Sent: Wednesday, September 26, 2018 5:23 PM
To: Jackson, Ryan <jackson.ryan@epa.gov>; Lyons, Troy <lyons.troy@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>; Gunasekara, Mandy <Gunasekara.Mandy@epa.gov>; Woods, Clint <woods.clint@epa.gov>; Stepp, Cathy <stepp.cathy@epa.gov>; Thiede, Kurt <thiede.kurt@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>
Subject: Draft response to letters
Importance: High

We have three letters now (all attached) from Members of Congress and the State of Illinois. Below is a draft response to all three. Once edits are made and OCIR formats, we should get these out the door ASAP and simultaneously share with the press.

Draft / Deliberative

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

<EPA Wheeler - EtO Emissions at Sterigenics.pdf>

Message

From: Frank Trilla [ftrilla@willowbrook.il.us]
Sent: 10/19/2018 4:47:03 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Durkin, James B. [james.durkin@saul.com]
Subject: Fwd: Stack Test Results
Attachments: ATT00001.txt; Sterigenics Willowbrook Final Test Result Summary 101818_Attachment.pdf; BV Test Report CL Signed 10182018.pdf; WB1 Test Report and Attachments 10182018.pdf; WB2 Test Report and Attachments 10182018.pdf; Sterigenics Designed for Safety.pdf

Mayor Frank Trilla.

From: Tim Halik
Sent: Friday, October 19, 2018 9:29:25 AM
To: Cipriano, Renee; Lyons, Francis; Gayle Neal; Lucy Fraiser; Paul Farber; Dyron Hamlin; Benjamin.chandler@ghd.com
Cc: Frank Trilla; Tom Bastian
Subject: FW: Stack Test Results

FYI....

Tim Halik
Village Administrator
Village of Willowbrook
835 Midway Drive
Willowbrook, IL 60527

Office (direct): 630.920.2261
Fax: 630.323.0787
E-mail: thalik@willowbrook.il.us
Web: www.willowbrookil.org

From: Frank Trilla
Sent: Friday, October 19, 2018 9:25 AM
To: Tim Halik <thalik@willowbrook.il.us>
Subject: Fwd: Stack Test Results

Mayor Frank Trilla.

From: Hoffman, Kathy <KHoffman@sterigenics.com>
Sent: Friday, October 19, 2018 8:28:13 AM
To: Frank Trilla; Mickey@mayormickey.com
Subject: Stack Test Results

I just wanted to let you know that we published and submitted the final stack test reports for the recent upgrades. Attached is an executive summary, the submittal cover letter, the final reports and a new summary graphic.

These can also be found on our microsite: www.sterigenicswillowbrook.com.

Let me know if you have any questions.

Regards,
Kathy

Kathleen Hoffman
Senior Vice President - Global Environmental, Health & Safety and Technical Services
Sterigenics, A Sotera Health Company
2015 Spring Road, Suite 650
Oak Brook, IL 60523
Office: 630.928.1758
khoffman@sterigenics.com

This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Sterigenics

DESIGNED FOR SAFETY

Willowbrook Facility's State-of-the-Art Systems Safely Control and Contain Ethylene Oxide (EO)

1 CONTROLLING
EO Containers

- Precise transport protocols
- Mandated storage standards
- Rigorous monitoring and leak testing systems

2 CONTAINING
EO in the Sterilization Process

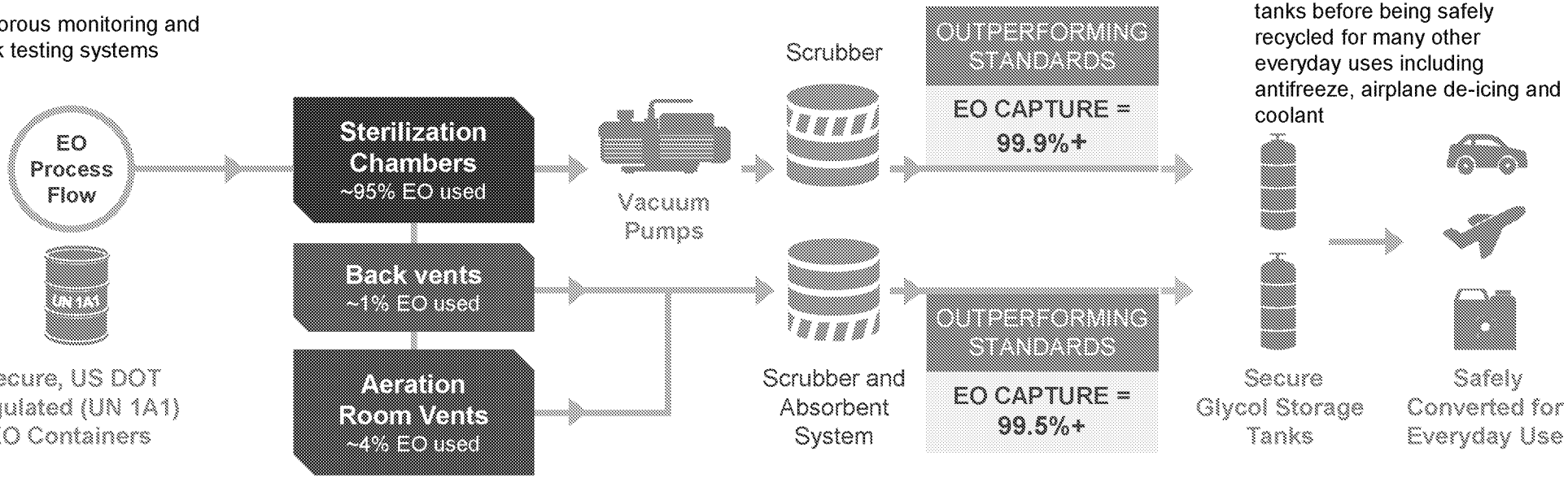
- Strict FDA standards
- Rigorous monitoring and leak testing systems

3 CAPTURING
EO Emissions

- Less than 0.1% (1/10th of one percent) released to atmosphere

4 CONVERTING
Used EO

- Captured EO is converted into ethylene glycol
- Glycol is stored securely in tanks before being safely recycled for many other everyday uses including antifreeze, airplane de-icing and coolant



STRICT ADHERENCE TO MANDATED REGULATIONS

- EPA regulates air quality standards to keep our NEIGHBORS safe
- OSHA regulates facility operations to keep our EMPLOYEES safe
- Department of Transportation and Homeland Security regulate shipments to keep CITIZENS safe
- FDA regulates sterilization process to keep PATIENTS safe

Sterigenics
A Sotera Health company

Sterigenics Willowbrook Final Test Results Report - Executive Summary 10/18/18

Sterigenics has released the final reports for the compliance emission control tests that were recently completed at the Willowbrook I and Willowbrook II facilities. The final reports reconfirm the initial results released on September 27 concluding that ethylene oxide (EO) emission levels at the Sterigenics Willowbrook facilities are operating well below permitted levels and also below detection limits. Based on the independent test results, Sterigenics is delivering EO control efficiencies of 99.62 percent and 99.51 percent for the recent voluntary upgrades at the Willowbrook I and II facilities, respectively. These test results also confirm that across the entire sterilization system Sterigenics controls and captures more than 99.9 percent of the EO used in the process and converts it for safe reuse, as further detailed in Willowbrook – Designed for Safety attachment.

Sterigenics is committed to adhering to strict regulations and operating safely, in addition to providing real facts to reassure the public that it is safe. Stack testing was conducted at the Sterigenics facilities on September 20 and 21, 2018 to test the recent equipment upgrades that control the back vent process emissions. The two-day testing was conducted by a third-party, independent tester and witnessed by representatives from the IL-EPA, U.S. Environmental Protection Agency (EPA), Tri-State Fire Department and the Village of Willowbrook.

The final test reports prepared by a third-party summarize the details of the emission control compliance tests including a summary of the following test components: the sterilization and emission control equipment, regulatory compliance requirements, compliance test and operating conditions, reference test methods used for the testing, the Quality Assurance and Quality Control reviews and the final test results. There are separate reports for the compliance tests completed at each Willowbrook facility.

2015 Spring Road Ste 650 Oak Brook, IL 60523
630.928.1700 | sterigenics.com

REPORT OF
AIR POLLUTION SOURCE TESTING
OF AN ETHYLENE OXIDE EMISSION-CONTROL SYSTEM
OPERATED BY STERIGENICS, US, LLC
IN WILLOWBROOK, ILLINOIS
ON SEPTEMBER 20, 2018

WILLOWBROOK II FACILITY

Submitted to:

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1021 North Grand Avenue East
Springfield, Illinois 62794

Submitted by:

STERIGENICS US, LLC.
2015 Spring Road
Oak Brook, Illinois 60523

I.D. Number 043110AAC

Prepared by:

ECSI, INC.
PO Box 1498
San Clemente, California 92674-1498

OCTOBER 18, 2018

ECSi

CONTACT SUMMARY

CLIENT

Mr. Kevin Wagner
Director of Environmental Health and Safety
STERIGENICS US, LLC.
2015 Spring Road, Suite 650
Oak Brook, Illinois 60523

Phone: (630)928-1771
FAX: (630)928-1701
email: kwagner@sterigenics.com

FACILITY

Mr. Paul Krett
General Manager
STERIGENICS US, LLC.
830 Midway Drive
Willowbrook, Illinois 60521

Phone: (630)654-5151
FAX: (630)325-0020
email: pkrett@sterigenics.com

TEST DATE

Thursday, September 20, 2018

REGULATORY AGENCY

Daniel Rowell
Environmental Protection Engineer III
Bureau of Air – Air Permits Section
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Phone: (217)558-4368
FAX: (217)524-5023
Email: daniel.rowell@illinois.gov

TESTING CONTRACTOR

Daniel P. Kremer
President
ECSi, Inc.
PO Box 1498
San Clemente, California 92674-1498

Phone: (949)400-9145
FAX: (949)281-2169
email: dankremer@ecsi1.com

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ECSi

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1.0 INTRODUCTION

On Thursday, September 20, 2018, ECSi, Inc. performed air pollution source testing of an ethylene oxide (EtO) emission-control device operated by Sterigenics US, LLC at their Willowbrook II ethylene oxide sterilization facility located at 830 Midway Drive. The control device tested was a two-stage Advanced Air Technologies (AAT) Safe Cell emission-control system, comprised of a packed-tower chemical scrubber and a dry-bed reactor, used to control emissions from four sterilizer vacuum pumps, four sterilizer backvents, and two aeration rooms.

The purpose of the testing program was to demonstrate compliance with the conditions established in Section 6 of the Construction Permit (Application No: 18060020) granted to Sterigenics by the Illinois Environmental Protection Agency (IEPA) to control emissions from the sterilization chamber backvents. See Appendix L.

Test Protocols were submitted and approved by IEPA prior to testing. Copies of protocols and approval are included with Appendix L.

Representatives from Sterigenics were present during the testing as well as personnel listed below:

- Kevin Mattison, IEPA
- Ned Shappley, US EPA, OAQPS
- Margaret Sieffert, US EPA, Region 5
- Paul Farber, PE (Consultant for Village of Willowbrook)
- Lawrence Link, Tri-State Fire Department

2.0 EQUIPMENT

The gas sterilization and emission control equipment in Willowbrook II consists of the following:

- Four Sterilizers, each comprised of a steam-heated sterilization chamber, a vacuum pump chamber evacuation system, and a backvent valve;
- Two aeration rooms, each comprised of a heated aeration space.

Chamber exhaust, backvents, and aeration emissions are controlled by:

- One two-stage Advanced Air Technologies (AAT) Safe Cell emission-control system, comprised of a packed-tower acid/water scrubber (SC1), equipped with a packed reaction/interface column, a scrubber fluid recirculation system, and a scrubber fluid reaction/storage tank, and a dry bed reactor/scrubber (SC2), comprised of a bank of solid-bed reaction vessels containing Safe-Cell IIA Reactant for EtO control, connected in parallel, installed downstream of SC1 and upstream of a dedicated blower exhaust system designed to operate at 10,150 cfm.

3.0 RULE/COMPLIANCE REQUIREMENTS

The EtO gas-sterilization system at the Willowbrook II facility was tested to demonstrate compliance with requirements specified in the Construction Permit issued by IEPA (Application No: 18060020) and CAAPP Permit No: 043110AAC. The following requirements must be met:

- The existing emission control equipment for chamber exhaust and aeration room emissions is required by 40 CFR Part 63, Subpart O to achieve a control efficiency of 99% or greater.
- Chamber backvent emissions are not regulated through the federal regulations at 40 CFR Part 63, Subpart O. By way of permit application 18060020, Sterigenics has voluntarily elected to control backvent emissions using existing emission control equipment at the facility already required to achieve 99% or greater control efficiency.

Testing is required to demonstrate continued compliance with these requirements.

4.0 TESTING

EtO source testing was conducted in accordance with the procedures outlined inUS EPA Reference Methods 2, 3, 4 and 18. EtO emissions monitoring was conducted simultaneously at the inlet and outlet of the AAT System during the 15-minute duration of the backvent process. Three 15-minute test runs were performed.

4.1 TEST SCENARIO

Once a sterilization chamber cycle ends, a sample from inside the chamber is taken and measured to ensure the EtO concentrations are below 25% of the lower explosive limit (LEL) for safety reasons. Current controls interlocks will not allow the doors to be open if the concentration of EtO at the end of a cycle exceeds 25% LEL. Once this criterion has been met, the process requires the chamber door to be partially opened for 15 minutes which vents the EtO in the chamber to reduce levels in the chamber and exposure to employees. The 15-minute duration ensures the highest concentration of EtO is removed from the chamber prior to unloading the product. During this venting, EtO exhausts through the backvent and to the AAT scrubber. In accordance with the facility's procedures, workers are not allowed to enter or unload the chamber until the 15-minute time period has passed. Once the 15-minutes has passed, the product is unloaded to the aeration room.

To meet Condition 6 of the Construction Permit which requires conditions for testing to be conducted as representative of maximum emissions, each test run was completed on the backvents using freshly sterilized product from one chamber for a 15-minute duration, for a total of three test runs at each facility. The emission testing of the sterilization chambers occurred while running FDA validated cycles with higher ending EtO concentrations for testing. Each test interval tested the first 15 minutes the backvent is opened and exhausted to the AAT scrubber.

4.2 PROCESS PARAMETERS MONITORED

Based on the overall AAT scrubber liquor storage volume, relatively short duration of the test, and knowledge of the operation of the AAT system, the properties of the AAT scrubber liquor were not expected to change significantly during the test. Because of this, the AAT Scrubber tank level, pH, and glycol concentration (measured via refractometer) were monitored and recorded before and after the performance of the three trial runs. Results are presented in Appendix A.

Cycle information for each test run, including ending EtO concentration in the chamber space, also was recorded. Emission levels from aeration also were recorded before performance of the three trial runs. Results are presented in Appendix A.

During routine operations, weekly concentration sampling of the AAT system is conducted using samples collected from the AAT system outlet using a Tedlar bag and the facility's gas chromatograph system. Since this performance testing involved real-time analysis of the inlet and outlet concentrations of the AAT system, Tedlar bag sampling was not conducted during these tests.

4.3 TESTING EQUIPMENT

Testing equipment information and certifications are located in Appendix G.

5.0 TEST METHOD REFERENCE

5.1 INTRODUCTION

EtO source testing was performed in accordance with US EPA Reference Methods 1, 2, 3, 4 and 18. EtO emissions monitoring was conducted simultaneously at the inlet and outlet of the AAT System during each 15-minute duration of the backvent process. A total of three test runs was performed.

During backvent testing, EtO emissions at the inlet and the outlet of the AAT Safe Cell System were determined using direct source sample injection into the gas chromatograph (GC). The GC used to analyze EtO concentrations was a SRI Model 8610 (also described in Section 5.3).

US EPA Method 1: Sample and Velocity Traverses for Stationary Sources (40 CFR 60 Appendix A)

Sample ports and flow traverse locations were located at the inlet and outlet of the AAT control device. Numbers of flow traverse locations were selected to exceed those recommended by Tables 1.1 and 1.2, and were spaced throughout the duct in accordance with Method 1. The average angle of cyclonic flow at each traverse point was less than the maximum average angle specified in Method 1. For further information on sample port locations, sample and velocity traverses, and cyclonic flow measurements please see Appendix B.

US EPA Method 2: Determination of Stack Gas Velocity and Volumetric Flow Rate (Type S Pitot Tube) (40 CFR 60 Appendix A).

The average gas velocity in a stack is determined from the gas density and from measurement of the average velocity head with a Type S (Stausscheibe or reverse type) Pitot tube. This method was used in its entirety as per the procedures outlined in Method 2.

ESCI performed a cyclonic flow check and velocity traverse using an S-type Pitot tube in each duct prior to the first test run. These results were used to calculate EtO mass flow rates. ESCI also used a standard Pitot tube constructed in accordance with Method 2C to measure velocity at a single point in the duct during the test runs to verify that gas flow rate remained steady during tests.

US EPA Method 3: Gas Analysis for the Determination of Dry Molecular Weight (40 CFR 60 Appendix A)

The Construction permit at 6(b) specifies testing using Method 3A or 3B (for calculating the dry molecular weight of the duct gases based on measurement of the duct gas oxygen and carbon dioxide concentrations). In accordance with Method 2, Section 8.6 and the approved Test Protocol, a dry molecular weight of 29.0 was assumed instead of by calculation. This is in accordance with Method 2 and is allowed by Method 3 because the process does not involve combustion and emits essentially ambient air.

US EPA Method 4: Determination of Moisture Content in Stack Gases (40 CFR 60 Appendix A)

The moisture concentrations in the duct gases were calculated assuming saturated conditions based on the measured gas temperature, duct static pressure and barometric pressure, in accordance with Method 4(16.4). For calculations pertaining to this method, see Appendix D.

- Barometric pressure was determined using local meteorological data from the time and date of the actual testing. See Appendix F.
- Duct static pressure was determined using an inclined oil manometer.
- Duct gas temperature was determined using from a type K thermocouple and thermometer.

US EPA Method 18: Measurement of Gaseous Organic Compound Emissions by Gas Chromatography

The major organic component of the gas mixture, EtO is separated by gas chromatography (GC). Measurement of EtO concentrations across the inlet/outlet ducts are expected to be uniform due to extensive air mixing throughout the emission control system. During backvent operations, constituents of the streams entering and exiting the AAT System were analyzed at a single point by an SRI, Model 8610, portable GC, equipped with the following: dual, heated sample loops and injectors; dual columns; and dual detectors. A flame ionization detector (FID) was used to quantify inlet EtO emissions, and photoionization detector (PID) was used to quantify low-level EtO emissions at the emission control system outlet. The PID was equipped with a 11.7eV lamp. For chromatographic data associated with the use of this method, see Appendix E. The sample transport system is described in Section 5.4 of this report.

Samples were continuously extracted and analyzed at approximately one- to two-minute intervals, for a total of 12 to 13 samples, during each 15-minute test run.

5.2 VOLUMETRIC FLOW MEASUREMENT

Exhaust gas flow at the inlet and outlet of the AAT scrubber was determined by Method 2, using an S-type pitot tube and an inclined-oil manometer. Sampling ports were located in accordance with Method 1. The test ports were located far enough from any flow disturbances and velocity was measured at multiple points within the duct cross-section to permit accurate flow measurement. Equal-area traverse points for pre-test velocity traverses were selected in accordance with Method 1. Confirmation of the absence of cyclonic flow occurred prior to the commencement of the three test runs. Please see Appendices B and F for additional Method 1 related information.

Because of the short duration of the backvent operation, traversing the entire stack during each minute of test run was infeasible. With approval of IEPA and US EPA, an average differential pressure point was determined before the test, and that parameter was used to confirm flow during each minute while concentration samples were collected. Please see Appendix F for tables of this information collected in the field.

Temperature measurements were obtained from a type K thermocouple (FLIR EA10) and thermometer attached to the sampling probe. Exhaust gas composition was assumed to be air saturated with water vapor.

5.3 CONTROL EFFICIENCY AND MASS EMISSIONS MEASUREMENT

During backvent operations, constituents of the streams entering and exiting the AAT System were analyzed by an SRI, Model 8610, portable gas chromatograph (GC), equipped with the following: dual, heated sample loops and injectors; dual columns; and dual detectors. A flame ionization detector (FID) was used to quantify inlet EtO emissions, and photoionization detector (PID) was used to quantify low-level EtO emissions at the emission control system outlet. The PID was equipped with an 11.7eV lamp. The mass of EtO in the inlet and outlet streams were determined using equation shown below in Section 5.9. EtO mass control efficiency during the backvent process was calculated by comparing the mass of EtO vented to the system inlet to the mass of EtO vented from the system outlet. See equation shown in Section 5.9.

5.4 SAMPLE TRANSPORT

The Willowbrook II facility utilizes a dual stage AAT system equipped with a 10,150 cfm rated blower system that serves to quickly draw process emissions from the sources through the control system. The AAT Scrubber system efficiency operates at a very high level in large part due to the use of sulfuric acid in the scrubber liquor, which lowers the pH of the solution and acts as a catalyst - increasing the speed of the hydrolysis of ethylene oxide to ethylene glycol.

The gas sample was continuously pumped to the GC at approximately 1000 cubic centimeters per minute (cc/min) from the sample probe through two 100-foot lengths of heated and insulated 3/8" Teflon® sample line (.030 wall), each with an interior volume of approximately 1535 cubic centimeters. The source gas was pumped to the GC with a response time of approximately 1.5 seconds. See Appendix H for sample line volume and residence time calculations.

The lines were heated to ≥ 110 °C. Temperature of the heated lines was monitored before, during and after each trial run via observing the temperature on the heated lines temperature controller. See Appendix A for this data. The sample probe was constructed of stainless steel tubing and was not heated.

At the inlet of the Safe Cell System, the sampling ports were located in the duct immediately upstream of the packed tower scrubber. At the outlet of the AAT System, sampling ports were located in the exhaust stack downstream of the dry bed reactors. See Appendix B for sampling port location information.

5.5 GC INJECTION

Source-gas samples were then injected into the GC which was equipped with two heated sampling loops, each containing a volume of approximately 2 cubic centimeters (cc) and maintained at 100 degrees Celsius (°C). Injections occurred at approximately one to two-minute intervals during backvent testing. Helium was the carrier gas for both the FID and the PID.

5.6 GC CONDITIONS

The packed columns for the GC were both operated at 90 °C. The columns were stainless steel, 6 feet long, 0.125 inch outer diameter, packed with 1 percent SP-1000 on 60/80 mesh Carbopack B.

During the analysis, the FID was operated at 250 °C. The support gases for the FID were hydrogen (99.995% pure) and air (99.9999% pure). Any unused sample gas was vented from the GC system back to the inlet of the control device being tested.

5.7 CALIBRATION STANDARDS

The FID was calibrated for mid-range part-per-million-by-volume (ppmv) level analysis using gas proportions similar to the following:

1) 1000 ppmv EtO, balance nitrogen ***
2) 100 ppmv EtO, balance nitrogen
3) 50 ppmv EtO, balance nitrogen (audit gas)
4) 10 ppmv EtO, balance nitrogen
5) 1 ppmv EtO, balance nitrogen

***Note: Calibrations for this standard were performed following the test to confirm appropriate range of instrument.

The PID was calibrated for low-range ppmv level analyses using gas proportions similar to the following:

1) 100 ppmv EtO, balance nitrogen
2) 50 ppmv EtO, balance nitrogen (audit gas)
3) 10 ppmv EtO, balance nitrogen
4) 1 ppmv EtO, balance nitrogen

See Appendix J for calibration gas certifications. Please see Appendix I for triplicate calibration data performed before and after each set of test runs and calibration curves.

As a part of the test's quality assurance, limit of detection and recovery studies were performed. Refer to that section later in the document and Appendices K and I, respectively for further information.

5.8 SAMPLING DURATION

Testing was performed in 15-minute increments in conjunction with normal production operations, for each of the three test runs while chamber backvents were operating.

5.9 SAMPLE CALCULATIONS

Method 1

Equivalent diameter was calculated as follows:

$$D_e = \frac{2(L)(W)}{L+W}$$

Actual diameters of round ducts and equivalent diameters of square and rectangular ducts were used to evaluate whether sufficient distance existed between the sample ports and upstream and downstream flow disturbances. These figures were used in conjunction with Method 1's Table 1.1 and 1.2 to ensure that the minimum number of traverse points required for testing was exceeded.

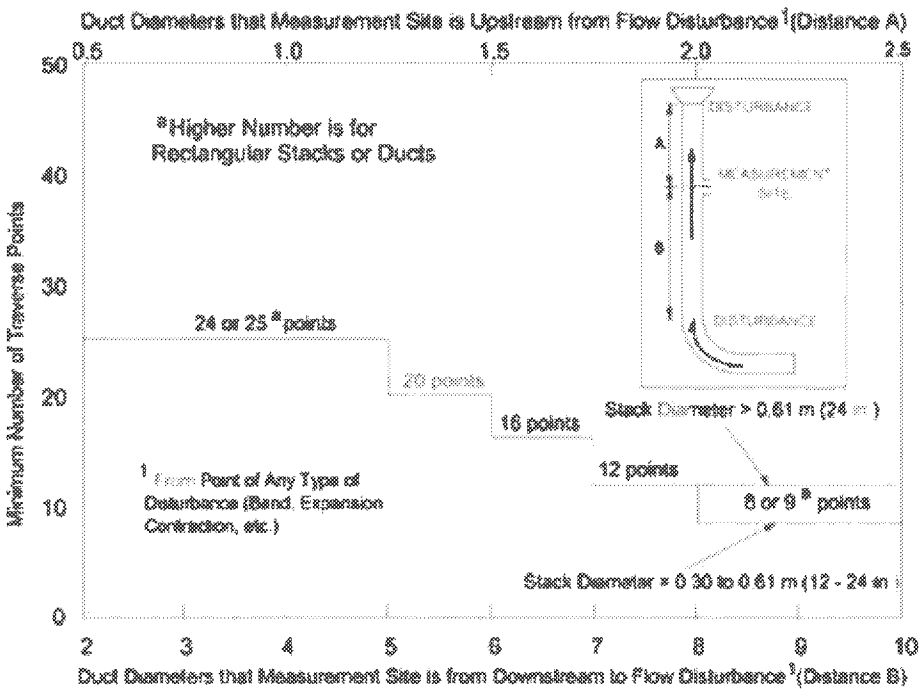

Figure 1-1. Minimum number of traverse points for particulate traverses

* * * * *

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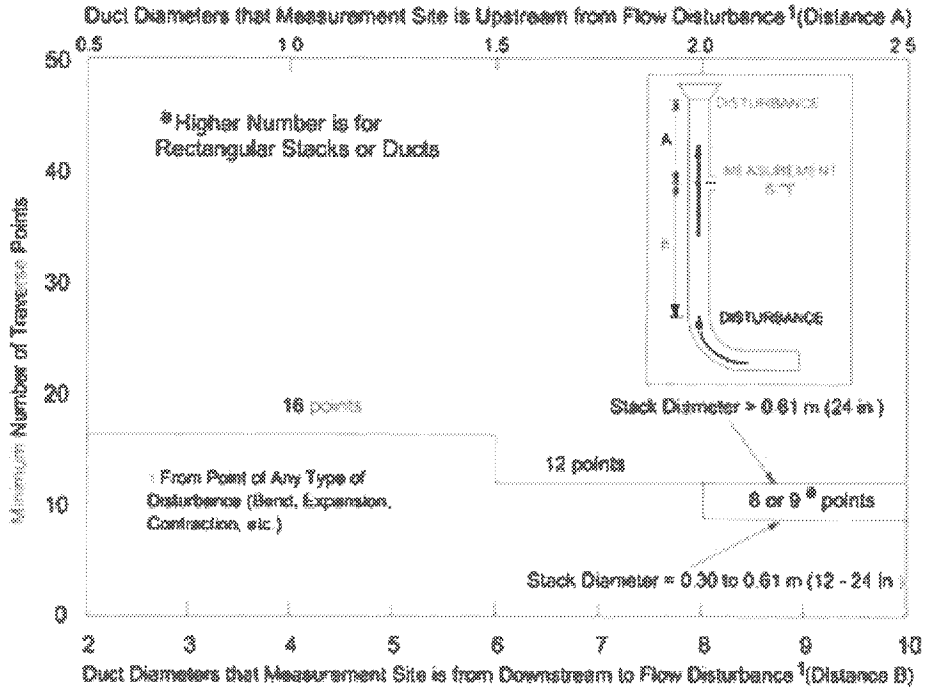

Figure 1-2. Minimum number of traverse points for velocity (nonparticulate) traverses

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Method 2

Stack gas velocity and volumetric flow rate were calculated using equation 2-7 and 2-8 as outlined in Method 2.

Q = Average Stack Gas Dry Volumetric Flow Rate (dscf/min)

$$= 60\,(1 - B_{ws})\,V_s\,A \left| \frac{T_{std}\,P_s}{T_{s(abavg)}P_{std}} \right|$$

V_s = Average Stack Gas Velocity

$$V_s = K_p\,C_p \left[\frac{\sum_{i=1}^{n} \sqrt{\Delta p_i}}{n} \right] \sqrt{\frac{T_{s(abavg)}}{P_s\,M_s}}$$

Where:

K_p = Velocity equation constant

$$= 85.49 \frac{ft}{\sec} \left[\frac{(lb/lb-mole)(in.\,Hg)}{(^oR)(in.\,H_2O)} \right]^{1/2}$$

C_p = Pitot Tube Coefficient = 0.84 (S-type pitot tube coefficient for geometric calibration)

Δp_i = Individual velocity head reading at traverse point "i" (in. Hg)

n = number of traverse points

$T_{s(abavg)}$ = Average absolute stack temperature (°R)

P_s = Absolute stack pressure ($P_{bar} + P_g$)

P_{bar} = Barometric pressure at measurement site (in. Hg)

P_g = Stack static pressure (in. Hg)

M_s = Molecular weight of stack gas, wet basis

$$M_s = M_d\,(1 - B_{ws}) + 18.0B_{ws}$$

Method 4

Moisture content was determined using the calculation for saturation in accordance with Method 4.

$$B_{ws(svp)}(\%) = 100\left(\frac{10^{\left(\text{avg}\left(\frac{1000}{T_{s(avg)}+\text{Const}}\right)\right)}}{\left(P_b + \frac{P_{static}}{13.6}\right)}\right)$$

Where:

$B_{ws(svp)}(\%)$ = Saturated moisture concentration (% by volume)

$T_{s(abavg)}$ = Average absolute stack temperature (°F)

P_b = Barometric pressure at measurement site (in. Hg)

P_{static} = Stack static pressure (in. H_20)

Mass Emission Calculation

Mass emissions of EtO during backvent were calculated using the following equation:

W = (Q)(MolWt)(C /10^6)/(MolVol)

Where:

W	=	EtO mass flow rate, pounds per minute
Q	=	Corrected duct gas volumetric flow rate, dry standard cubic feet per minute at 68 degrees F and 29.92 in. Hg (see calculation under Method 2)
MolWt	=	44.05 pounds EtO per pound mole
C	=	EtO concentration, parts per million by volume
10^6	=	Conversion factor, ppmv per "cubic foot per cubic foot"
MolVol	=	385.32 cubic feet per pound mole at 68 degrees F and 29.92 in. Hg

Control Efficiency Calculation

Mass control efficiency of EtO during backvent was calculated using the following equation:

Efficiency = (W_i - W_o / W_i)(100)

Where:

W_i = Mass flow rate to the control device inlet, pounds per minute, calculated as described above where:

C_i = EtO concentration at the control device inlet, ppm

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Q_i = Duct gas volumetric flow rate at the control device inlet, dry standard cubic feet per minute

W_o = Mass flow rate from the control device outlet, pounds per minute calculated as described above where:

C_o = EtO concentration at the control device outlet, ppm

Q_o = Duct gas volumetric flow rate at the control device outlet, dry standard cubic feet per minute

Results of the control-efficiency testing are presented in Section 8.0 and in Table 1 and 2.

6.0 TEST SCENARIO

Backvent testing was performed during normal process load conditions, with freshly sterilized product in the sterilization chambers. Three test runs were conducted in series to verify the performance of the emission-control system.

Sterigenics scheduled three chambers to end the sterilization cycle to allow for the three test runs to run consecutively. The general testing sequence was as follows:

Timing	Task	Method
Prior to test	Sample locations established	Method 1
Prior to test	Sample traverse locations established	Method 1
One time prior to each set of runs	3-point calibration performed in triplicate.	Method 18
One time prior to each set of runs	Confirm absence of cyclonic flow	Method 1
One time prior to each set of runs	Collect AAT system scrubber liquor pH, tank level, and glycol % information. Note levels present from aeration.	N/A
One time prior to each set of runs	Flow traverse of inlet and outlet conducted to establish flow rate and measurement centroid	Method 2
Prior to each test run	Note temperature reading of heated lines	N/A
Over test duration	Chamber door opened approximately 12 inches, actuator switch activates backvent	N/A
Beginning of each run	First sample initiated	Method 18
Over test duration	Samples at inlet and outlet taken approximately every 1-minute for a total of 15-minutes	Method 18
Over test duration	Flow monitoring sampled approximately every 1-minute.	Method 2
Mid-Test	Note temperature reading of heated lines	Method 18
After each test run	Collect cycle number and ending backvent EtO concentration in chamber head space are noted	N/A
After each test run	Note temperature reading of heated lines	Method 18
After each test run	Conduct recovery study	Method 18
After conclusion of each set of test runs	Perform post calibration checks	Method 18
After conclusion of each set of test runs	Collect AAT system scrubber liquor pH, tank level, and glycol %.	N/A
One time following each set of runs	Obtain meteorological data for sampling time	N/A
At least once during two test days for WB I and WB II	Perform Limit of Detection Study	Method 18

7.0 QA/QC

7.1 FIELD TESTING QUALITY ASSURANCE

At the beginning of the test, the sampling system was leak checked at a vacuum of 15 inches of mercury. The sampling system was considered leak free when the flow indicated by the rotameters fell to zero.

At the beginning of the test, a system blank was analyzed to ensure that the sampling system was free of EtO. Ambient air was introduced at the end of the heated sampling line and drawn through the sampling system line to the GC for analysis. The resulting chromatogram also provided a background level for non-EtO components (i.e. ambient air, carbon dioxide, water vapor) which are present in the source gas stream due to the ambient dilution air which is drawn into the emission-control device, and due to the destruction of EtO by the emission-control device which produces carbon dioxide and water vapor. This chromatogram, designated ambient background, is included with the calibration data in Appendix I.

A recovery study was also performed in accordance with Section 8.4.1 of Method 18 using 10 ppm and 100 ppm EtO calibration gas. The 100 ppm calibration gas was drawn through the heated sample line used at the control device inlet, and the 10 ppm calibration gas was drawn through the heated sample line used at the control device outlet. The calibration procedure was repeated in this manner, and it was verified that the analyzer response was within 10% of the calibration gas concentration sampled. See calibration data in Appendix I for further information regarding the recovery study.

7.2 CALIBRATION PROCEDURES

The GC system was calibrated at the beginning and conclusion of each day's testing. Using the Peaksimple II analytical software, a calibration curve was constructed for each detector. Calibration data can be found in Appendix I.

A seven-point Method Detection Limit (MDL) or Limit of Detection (LOD) study was performed prior to testing using procedures described in Section 15.0 of US EPA Method 301 (40 CFR 63 Appendix A) and in 40 CFR 136 Appendix B. The study was recommended by OAQPS and accepted by IEPA. The LOD for this test was determined to be 0.10ppm. A recovery study was also performed in accordance with Section 8.4.1 of Method 18 using 10 ppm and 100 ppm EtO calibration gas. The 100 ppm calibration gas was drawn through the heated sample line used at the control device inlet, and the 10 ppm calibration gas was drawn through

the heated sample line used at the control device outlet. The calibration procedure was repeated in this manner, and it was verified that the analyzer response was within 10% of the calibration gas concentration sampled. Results of the LOD study are presented in Appendix K. Results of the recovery study are presented in Appendix I.

All calibration gases and support gases used were of the highest purity and quality available. A copy of the laboratory certification for each calibration gas is attached as Appendix J.

8.0 TEST RESULTS

The AAT Safe Cell System demonstrated an EtO control efficiency of greater than 99.51 percent. In accordance with various state and federal requirements, this control equipment must have an EtO control efficiency of 99 percent or more. The AAT Safe Cell System has met this requirement.

The test results are summarized in Tables 1 and 2. These tables include results for EtO control efficiency of the emission-control device. Sample calculations related to destruction efficiency and other calculations can be found in Section 5.9.

TABLES 1 AND 2

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APPENDIX A

Process Parameter Logs

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APPENDIX B

Method 1 Calculation

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APPENDIX C

Method 2 Calculation

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APPENDIX D

Method 4 Calculation

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APPENDIX E

Chromatograms - Backvent

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APPENDIX F

Field Data

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APPENDIX G

Testing Equipment Information

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APPENDIX H

Sample Line Residence Time

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APPENDIX I

Calibration Data

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APPENDIX J

Gas Certifications

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APPENDIX K

Limit of Detection

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Permits/Protocols

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TABLES 1 AND 2

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TABLE 1
ETHYLENE OXIDE CONTROL EFFICIENCY SUMMARY – BACKVENT
STERIGENICS - WILLOWBROOK, ILLINOIS (PLANT 2)
SEPTEMBER 20, 2018

Test Run	Inlet Average Concentration (ppm)	Inlet Average Mass Flow rate (lb/min)	Outlet Average Concentration (ppm)[1]	Outlet Average Mass Flow rate (lb/min) ≤	Control Efficiency ≥
1	35.3	0.00054	ND	0.0000017	99.38%
2	62.52	0.0010	ND	0.0000017	99.50%
3	49.23	0.00076	ND	0.0000017	99.66%

Control Efficiency ≥ 99.5133%

Efficiency = (MassFlowin - MassFlowout / MassFlowin)(100)
Mass Flow (lb/min) = (VolFlow)(MolWt)(C /10^{6})/(MolVol)/60

Inlet VolFlow= 8071 dscfm
Outlet VolFlow = 8947 dscfm
MW EtO = 44.05
MolVol = 385.32
C = Concentration

[1] ND = non detect. Detection limit of the GC was determined to be 0.1 ppm

TABLE 2 - ETHYLENE OXIDE CONTROL EFFICIENCY – BACKVENT
STERIGENICS - WILLOWBROOK, ILLINOIS (PLANT 2)
SEPTEMBER 20, 2018

		INLET ETO		OUTLET ETO		
Run Number	Time	Concentration (PPM)[1]	Mass Flow[3] (lb/min)	Concentration (PPM)[1,2]	Mass Flow[3] (lb/min) ≤	Control Efficiency[4]
1	1539	7.94	0.00012	ND	0.0000017	98.6038%
1	1540	8.41	0.00013	ND	0.0000017	98.6818%
1	1541	213	0.00328	ND	0.0000017	99.9480%
1	1542	30.4	0.00047	ND	0.0000017	99.6353%
1	1544	22.3	0.00034	ND	0.0000017	99.5029%
1	1545	22.2	0.00034	ND	0.0000017	99.5006%
1	1546	21.8	0.00034	ND	0.0000017	99.4915%
1	1547	19.7	0.00030	ND	0.0000017	99.4373%
1	1548	18.8	0.00029	ND	0.0000017	99.4103%
1	1549	20.3	0.00031	ND	0.0000017	99.4539%
1	1550	19.3	0.00030	ND	0.0000017	99.4256%
1	1552	19.8	0.00030	ND	0.0000017	99.4401%
2	1617	13	0.00020	ND	0.0000017	99.1472%
2	1618	545	0.00838	ND	0.0000017	99.9797%
2	1619	50	0.00077	ND	0.0000017	99.7783%
2	1620	22	0.00034	ND	0.0000017	99.4961%
2	1621	22.8	0.00035	ND	0.0000017	99.5138%
2	1622	19.7	0.00030	ND	0.0000017	99.4373%
2	1623	20	0.00031	ND	0.0000017	99.4457%
2	1625	20.5	0.00032	ND	0.0000017	99.4592%
2	1626	19.8	0.00030	ND	0.0000017	99.4401%
2	1627	19.5	0.00030	ND	0.0000017	99.4315%
2	1628	21.3	0.00033	ND	0.0000017	99.4795%
2	1629	19.4	0.00030	ND	0.0000017	99.4286%
2	1630	19.7	0.00030	ND	0.0000017	99.4373%
3	1651	20.6	0.00032	ND	0.0000017	99.4618%
3	1652	246	0.00378	ND	0.0000017	99.9549%
3	1653	40.1	0.00062	ND	0.0000017	99.7235%
3	1654	34.2	0.00053	ND	0.0000017	99.6758%
3	1655	30.8	0.00047	ND	0.0000017	99.6401%
3	1657	31.6	0.00049	ND	0.0000017	99.6492%
3	1658	33.1	0.00051	ND	0.0000017	99.6651%
3	1659	31.5	0.00048	ND	0.0000017	99.6481%
3	1700	31.8	0.00049	ND	0.0000017	99.6514%
3	1701	29.4	0.00045	ND	0.0000017	99.6229%
3	1703	31.5	0.00048	ND	0.0000017	99.6481%
3	1704	30.1	0.00046	ND	0.0000017	99.6317%

Notes:

[1] PPM = parts per million by volume

[2] ND = non detect. Detection limit of the GC was determined to be 0.1 ppm

[3] See Table 1 for Mass Flow Calculation

[4] See Table 1 for control efficiency calculation

APPENDICES

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APPENDIX A

Process Parameter Logs

PROCESS PARAMETER LOG FOR EACH TRIAL

DATE: 20 SEP 2018

SITE AAT TESTED (circle one): Willowbrook I Willowbrook II

Chamber Backvent Tested:	G - 13 pallet chamber w/10 pallets	
Chamber Running Cycle Number:	829	
Parameter	START (Data and Time)	FINISH (Data and Time)
Backvent Opening Time	3:38 pm	3:53 pm
Levels From Aeration	8.3 ppm 3:07 pm (inlet) 10.0 3:13 pm	not taken
Ending Chamber EO Concentration	600 ppm EO	

	Beginning (Time)	Middle (Time)	End (Time)
Heated Lines Temp Check Include Temp Units	230 F/230 F	230 F/230 F	230 F/230 F
	3:07 pm	3:50 pm	3:53 pm

PROCESS PARAMETER LOG FOR EACH TRIAL

DATE: 20 SEP 2018

SITE AAT TESTED (circle one): Willowbrook I Willowbrook II

Chamber Backvent Tested:	K - 13 pallet chamber w/ 10 pallets	
Chamber Running Cycle Number:	829	
Parameter	START (Data and Time)	FINISH (Data and Time)
Backvent Opening Time	4:16 pm	4:31
Levels From Aeration	not collected	not collected
Ending Chamber EO Concentration	6900 ppm EO	

	Beginning (Time)	Middle (Time)	End (Time)
Heated Lines Temp Check Include Temp Units	230 F / 230 F	230 F / 230 F	230°F / 230°F
	4:15 pm	4:23 pm	4:32

PROCESS PARAMETER LOG FOR EACH TRIAL

DATE: 20 SEP 2018

SITE AAT TESTED (circle one): Willowbrook I Willowbrook II

Chamber Backvent Tested:	J – B pallet chamber w/10 pallets	
Chamber Running Cycle Number:	829	
Parameter	START (Data and Time)	FINISH (Data and Time)
Backvent Opening Time	4:50 pm	5:05
Levels From Aeration	not recorded	not recorded
Ending Chamber EO Concentration	480 ppm EO	

	Beginning (Time)	Middle (Time)	End (Time)
Heated Lines Temp Check Include Temp Units	230F / 230 F	230 F / 230 F	230F / 230F
	4:50pm	4:57 pm	5:05 pm

PROCESS PARAMETER LOG FOR EACH SET OF TRIALS

Circle One: Willowbrook 1 AAT Willowbrook 2 AAT

Parameter	BEFORE (Time) 1730 PM	AFTER (Time) 1715 0515 PM
AAT Tank Level (inches)	193" NZ 20SEP18	193" NZ 20SEP18
AAT Liquor pH	0.77 NZ 20SEP18	0.78 NZ 20SEP18
AAT Liquor Glycol %	43.2 % NZ 20SEP18	43.4 % NZ 20SEP18

Samples collected by: NICK ZIELINSKI

Signature: [signature]

DATE: 20SEP18

PLEASE ATTACH TODAY'S METEOROLOGICAL DATA TO THESE TEST RECORDS

APPENDIX B

Method 1 Calculation

WB Sample Port Locations	Duct Size/Configuration	Length (Diameter)	Width	Diameter (Eq. Diameter)		Distance from/to Disturbance	Diameters from/to Disturbance	2D or greater downstream?	0.5D or greater upstream?
WB I Inlet	36" round	36		36	Downstream	78	2.2	YES	
				36	Upstream	44	1.2		YES
WB I Outlet	30" x 20" rectangular	30	20	24	Downstream	60	2.5	YES	
				24	Upstream	84	3.5		YES
WB II Inlet	28" round	28		28	Downstream	108	3.9	YES	
				28	Upstream	96	3.4		YES
WB II Outlet	28" square	28	28	28	Downstream	56	2.0	YES	
				28	Upstream	170	6.1		YES

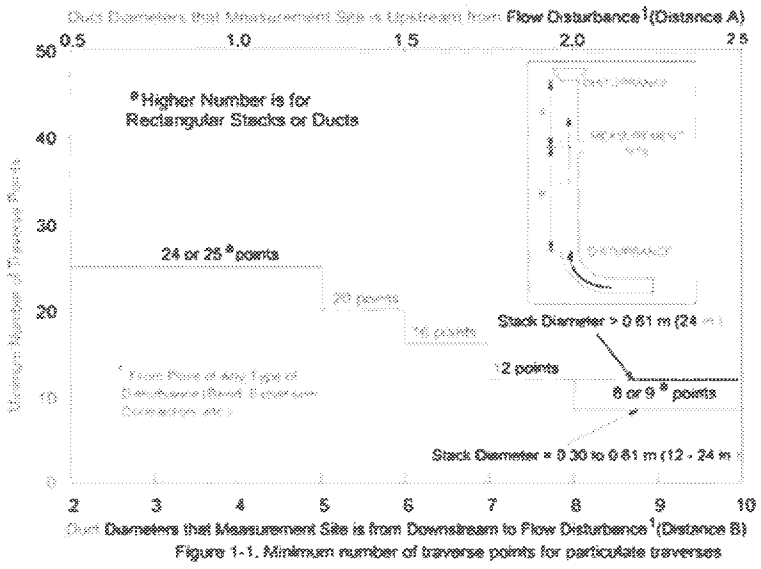

Figure 1-1. Minimum number of traverse points for particulate traverses

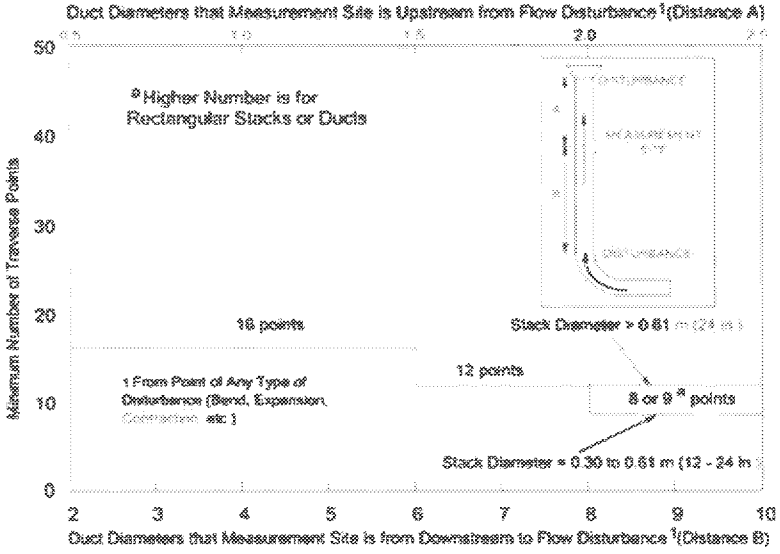

Figure 1-2. Minimum number of traverse points for velocity (nonparticulate) traverses

$$D_e = \frac{2(L)(W)}{L+W}$$

* * * * *

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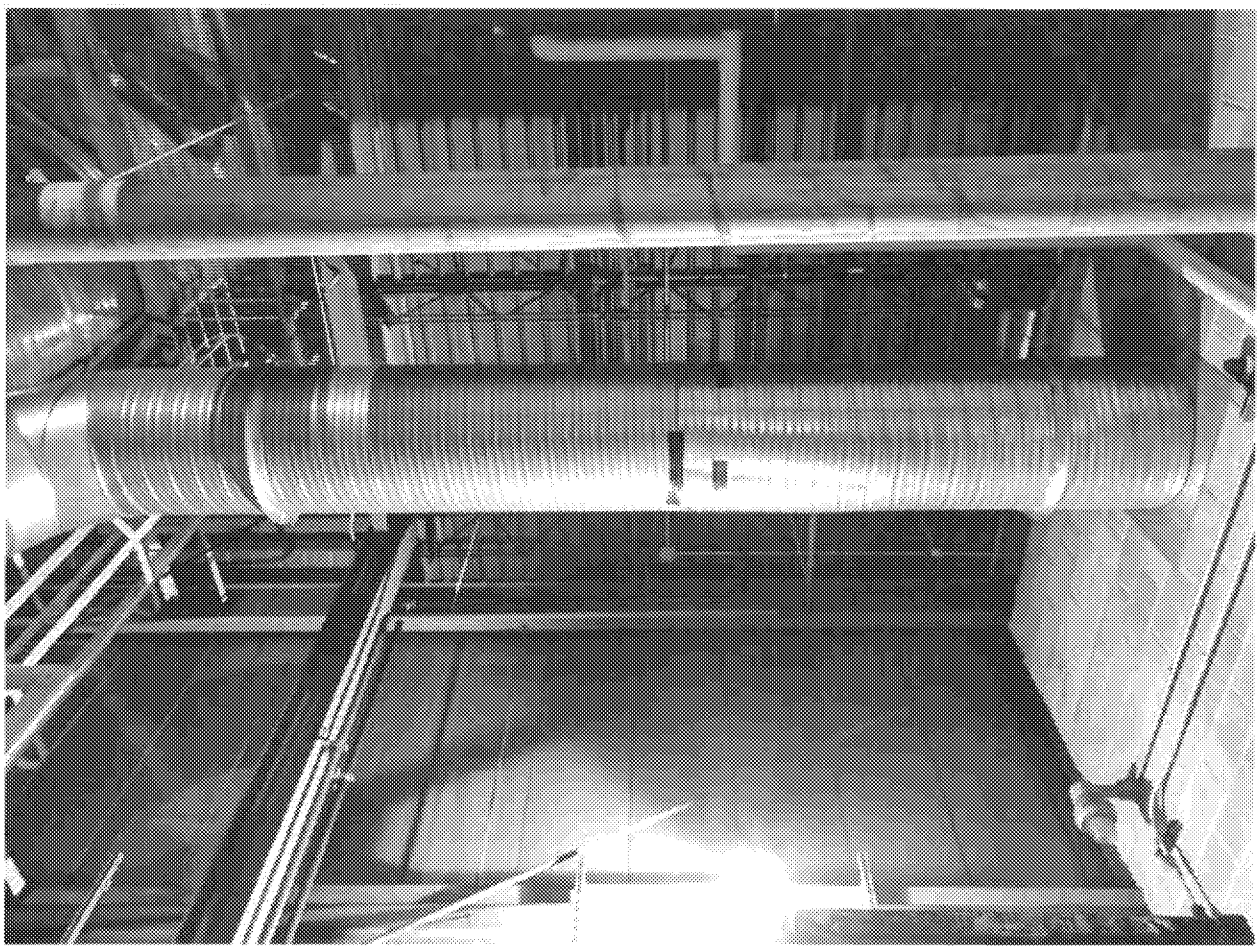
Willowbrook II AAT Inlet Duct Sampling Location

Photo Description – Photo taken in WB2 AAT Room, looking towards roof near room entrance. North is towards bottom of photo, and AAT control device is to the left.



Willowbrook II Inlet Duct Sampling Duct Location Diagram

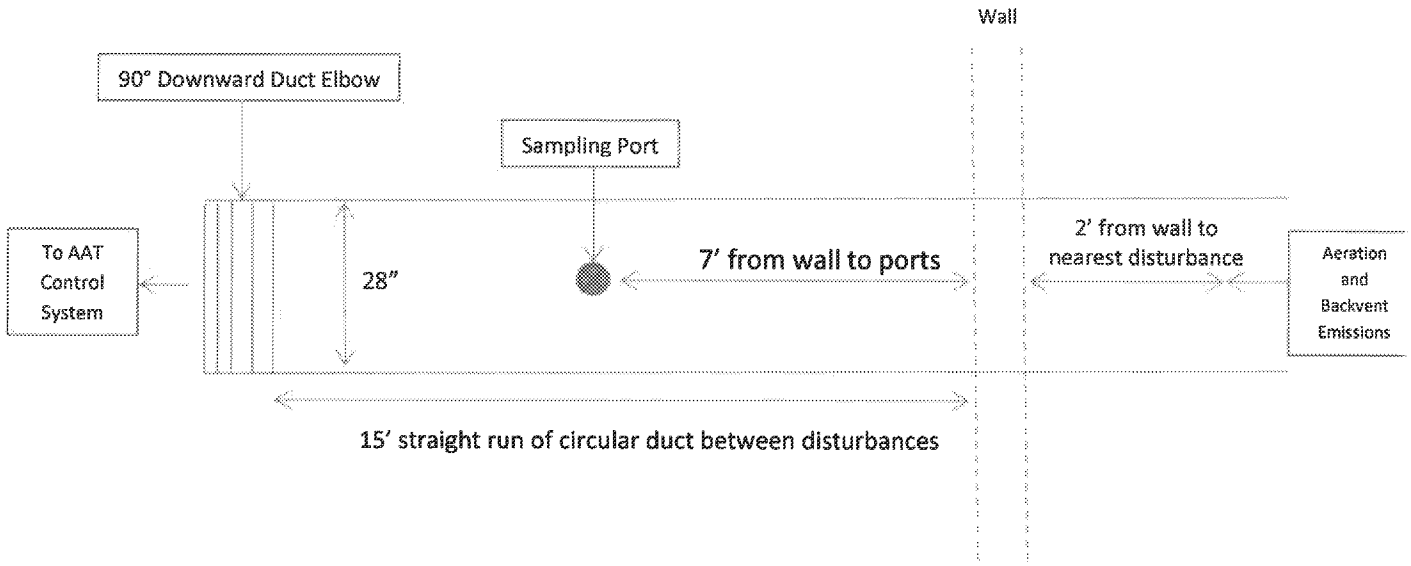
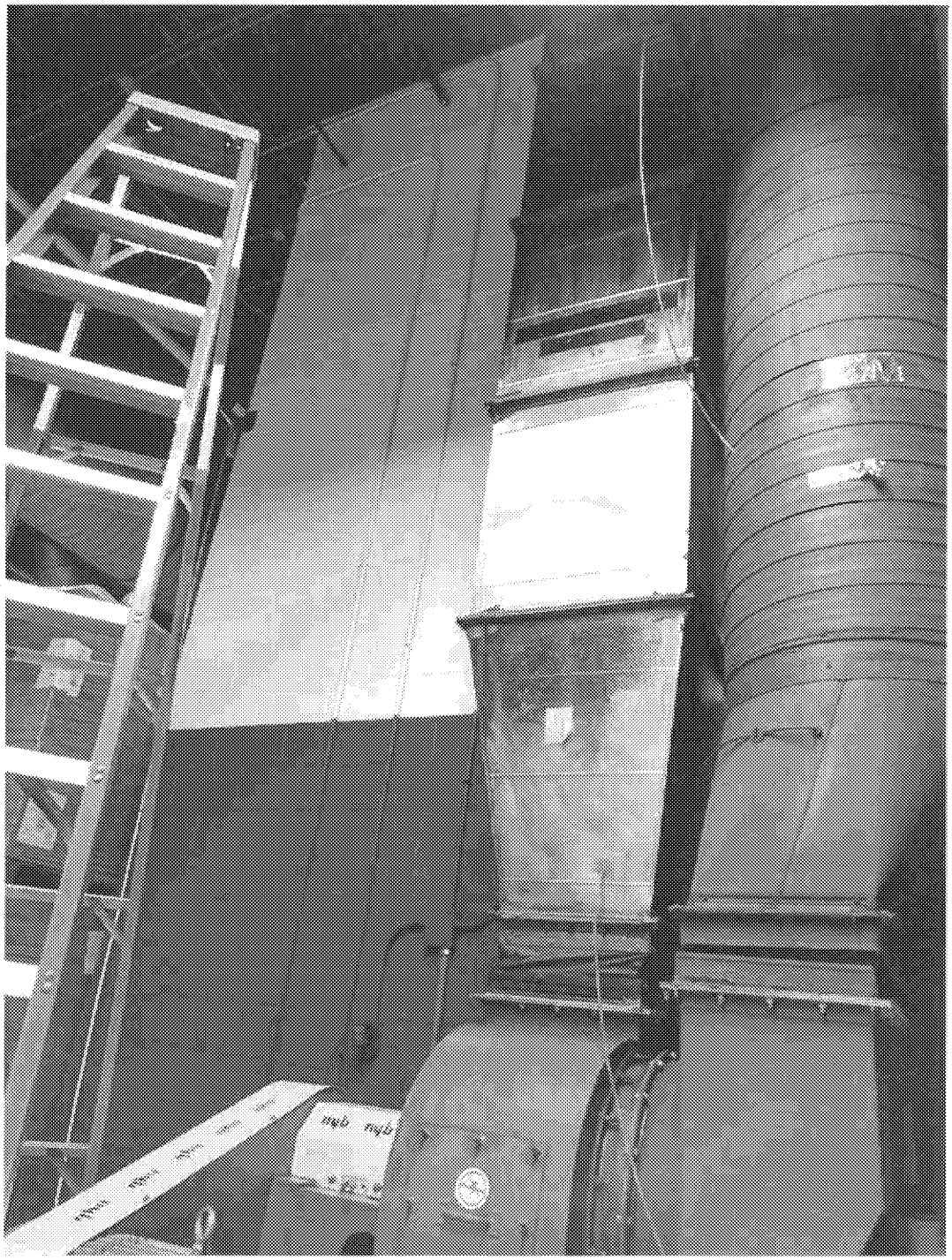


Diagram Description – Diagram depicts inlet duct configuration seen in photo, looking upward towards roof. All ducting in diagram has a 28" circular diameter. Sampling port depicted faces AAT Scrubber Room floor. An additional port will be located on the duct 90° from depicted port.

Willowbrook 2 AAT Outlet Duct Sampling Location

Photo Description – Photo taken in WB2 AAT Drybed Room, looking Southeast. Duct is square until it transitions near the roofline. Each pictured segment of straight duct is 34" in length.



Willowbrook II Outlet Sampling Duct Location Diagram

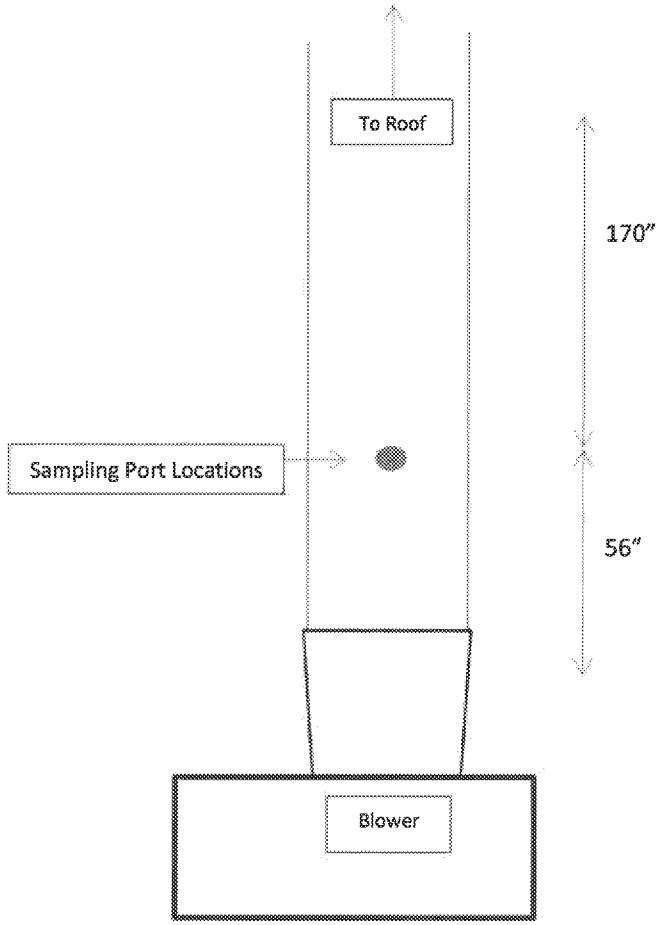


Diagram Description – Diagram depicts outlet duct sampling configuration in AAT Drybed Room seen in photo, with a slightly more perpendicular view to the duct, towards the south. The main run of ducting where the samples will be obtained is a 28" square duct. 56" and 170" are measurements to nearest duct disturbances.

APPENDIX C

Method 2 Calculation

ECSi, Inc.

Volumetric Flow Calculation - AAT Inlet

Sterigenics US, LLC - Willowbrook, IL (Plant 2)
9/20/2018

Data from Traverse Table			Constants		
Average SQRT(Δp)	0.6119	from Traverse Table	**MW dry =**	29.00	
Temp	94.9	°F	**stack diameter =**	28	in.
	555	°R	**stack area =**	4.28	sq. ft.
			Tstd =	528	
			Pstd =	29.92	
Moisture Content	5.68%		**Cp =**	0.84	
Ms	28.38	molecular weight of stack gas	**Kp =**	85.49	
Pb	29.15	Barometric pressure			
Pg	-0.35	Stack static pressure			
Ps	29.12	Absolute stack pressure			

Stack Velocity (Vs) = 36.0 ft/sec

$$V_s = K_p \; C_p \left[\frac{\sum_{i=1}^{n} \sqrt{\Delta \; p_i}}{n} \right] \sqrt{\frac{T_{s\,(abavg)}}{P_s \;\; M_s}}$$

Stack Flow (inlet)= **9239** **acf/min**

$Q_{actual} = 60 * V_s * A_s$

Stack Flow (inlet) = **8071** **dscfm**

$$Q = 60\,(1 - B_{ws})\,V_s\,A \left| \frac{T_{std}\,P_s}{T_{s(abavg)}\,P_{std}} \right|$$

ECSI, Inc.

Volumetric Flow Calculation - AAT Outlet

Sterigenics US, LLC. - Willowbrook, IL (Plant 2)
9/20/2018

Data from Traverse Table			Constants		
Average SQRT(Δp)	0.5421	from Traverse Table	**MW dry =**	29.00	
			stack ID =	28x28	in.
Temp	101.7	°F	**stack area =**	5.44	sq. ft.
	562	°R	**Tstd =**	528	
			Pstd =	29.92	
Moisture Content	7.03%		**Cp =**	0.84	
Ms	28.23	molecular weight of stack gas	**Kp =**	85.49	
Pb	29.15	Barometric pressure			
Pg	0.1	Stack static pressure			
Ps	29.16	Absolute stack pressure			

Stack Velocity (Vs) = 32.2 ft/sec

$$V_s = K_p \; C_p \left[\frac{\sum_{i=1}^{n} \sqrt{\Delta \; p_i}}{n} \right] \sqrt{\frac{T_{s\,(abavg)}}{P_s \;\; M_s}}$$

Stack Flow (outlet)= **10506** **acf/min**

$Q_{actual} = 60 * V_s * A_s$

Stack Flow (outlet) = **8947** **dscfm**

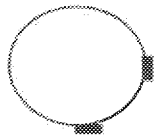
$$Q = 60\,(1 - B_{ws})\,V_s\,A \left| \frac{T_{std}\,P_s}{T_{s(abavg)}\,P_{std}} \right|$$

ECSI, INC. - VELOCITY TRAVERSE DATA

Client: Sterigenics | Run #: 1 | Date: 9/20/2018 | Port Sketch:

Location: Willowbrook - Plant 2 | Probe Type: S | Baro Press: 29.15

Source: AAT Safe Cell System Inlet | Stack I.D.: 28 in.



	Port 1							Port 2						
Inches		Delta P				Stack	Cyclonic		Delta P				Stack	Cyclonic
From Port	Point#	Low	High	Average	Sq Root	Temp (F)	Angle	Point#	Low	High	Average	Sq Root	Temp (F)	Angle
0.5	1	0.4	0.4	0.4	0.6325	88.2	7.2	1	0.5	0.5	0.5	0.7071	90.4	4.7
1.9	2	0.25	0.25	0.25	0.5000	88.2	6.3	2	0.25	0.25	0.25	0.5000	89.9	5.4
3.3	3	0.2	0.2	0.2	0.4472	88.5	3.4	3	0.3	0.3	0.3	0.5477	93.3	4.8
4.9	4	0.25	0.25	0.25	0.5000	91.2	4.8	4	0.35	0.35	0.35	0.5916	95.4	3.6
7.0	5	0.25	0.25	0.25	0.5000	93.5	3.6	5	0.4	0.4	0.4	0.6325	96.7	3.2
10.0	6	0.35	0.35	0.35	0.5916	95.8	4.7	6	0.45	0.45	0.45	0.6708	97.4	2.1
18.0	7	0.45	0.45	0.45	0.6708	95.6	3.8	7	0.45	0.45	0.45	0.6708	96.7	4.8
21.0	8	0.45	0.45	0.45	0.6708	95.7	3.7	8	0.47	0.47	0.47	0.6856	97.6	3.9
23.1	9	0.45	0.45	0.45	0.6708	97.4	5.1	9	0.4	0.45	0.425	0.6519	98.0	5.1
24.7	10	0.45	0.45	0.45	0.6708	97.9	4.5	10	0.45	0.45	0.45	0.6708	98.4	5.4
26.1	11	0.45	0.45	0.45	0.6708	98.2	3.6	11	0.48	0.48	0.48	0.6928	98.4	3.8
27.5	12	0.3	0.3	0.3	0.5477	97.4	2.2	12	0.35	0.35	0.35	0.5916	98.3	2.0
	13							13						
	14							14						
	15							15						
	16							16						
	17							17						
	18							18						
	19							19						
	20							20						
	21							21						
	22							22						
	23							23						
	24							24						
								Average Values:			0.3802	0.6119	94.9	4.2

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ECSI, INC. - VELOCITY TRAVERSE DATA

Client: Sterigenics | Run #: 1 | Date: 9/20/2018 | Port Sketch:

Location: Willowbrook - Plant 2 | Probe Type: S | Baro Press: 29.15

Source: AAT Safe Cell System Outlet | Stack I.D.: 28x28

	Port 1 & 2							Port 3 & 4						
Inches		Delta P				Stack	Cyclonic		Delta P				Stack	Cyclonic
From Port	Point#	Low	High	Average	Sq Root	Temp (F)	Angle	Point#	Low	High	Average	Sq Root	Temp (F)	Angle
3.5	1	0.5	0.5	0.5	0.7071	101	3.9	1	0.3	0.3	0.3	0.5477	100	4.4
7.0	2	0.55	0.55	0.55	0.7416	102	3.9	2	0.25	0.25	0.25	0.5000	102	5.4
10.5	3	0.6	0.6	0.6	0.7746	102	2.6	3	0.25	0.25	0.25	0.5000	102	5.6
14.0	4	0.6	0.6	0.6	0.7746	102	2.6	4	0.2	0.2	0.2	0.4472	102	3.1
17.5	5	0.55	0.55	0.55	0.7416	102	2.5	5	0.15	0.15	0.15	0.3873	102	1.8
21.0	6	0.6	0.6	0.6	0.7746	102	2.1	6	0.2	0.2	0.2	0.4472	102	2.5
24.5	7	0.6	0.6	0.6	0.7746	102	3.8	7	0.2	0.2	0.2	0.4472	102	2.0
3.5	1	0.4	0.4	0.4	0.6325	99.4	1.1	1	0.15	0.15	0.15	0.3873	101	4.2
7.0	2	0.4	0.4	0.4	0.6325	101	6.2	2	0.15	0.15	0.15	0.3873	102	5.0
10.5	3	0.4	0.4	0.4	0.6325	102	2.0	3	0.1	0.1	0.1	0.3162	102	1.2
14.0	4	0.3	0.3	0.3	0.5477	102	4.4	4	0.1	0.1	0.1	0.3162	102	4.7
17.5	5	0.3	0.3	0.3	0.5477	102	4.7	5	0.1	0.1	0.1	0.3162	102	1.8
21.0	6	0.4	0.4	0.4	0.6325	102	5.1	6	0.1	0.1	0.1	0.3162	102	0.8
24.5	7	0.4	0.4	0.4	0.6325	102	4.6	7	0.1	0.1	0.1	0.3162	102	2.5
											Average Values:	0.3196	0.5421	101.7	3.4

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APPENDIX D

Method 4 Calculation

Sterigenics - Willowbrook 2 - AAT Inlet
9/20/2018

Saturate Moisture Content (%)

$$B_{ws(svp)}(\%) = 100\left(\frac{10^{\left(6.691-\left(\frac{3144}{T_{s(avg)}+390.86}\right)\right)}}{\left(P_b+\frac{P_{static}}{13.6}\right)}\right)$$

Ts	94.9	stack temperature (F)
Pb	29.15	barametreric pressure (in Hg)
ps	-0.35	static pressure of stack (in H2O)

Bws(svp) = 5.68 %

Sterigenics - Willowbrook 2 - AAT Outlet
9/20/2018

Saturate Moisture Content (%)

$$B_{ws(svp)}(\%) = 100\left(\frac{10^{\left(6.691-\left(\frac{3144}{T_{s(avg)}+390.86}\right)\right)}}{\left(P_b+\frac{P_{static}}{13.6}\right)}\right)$$

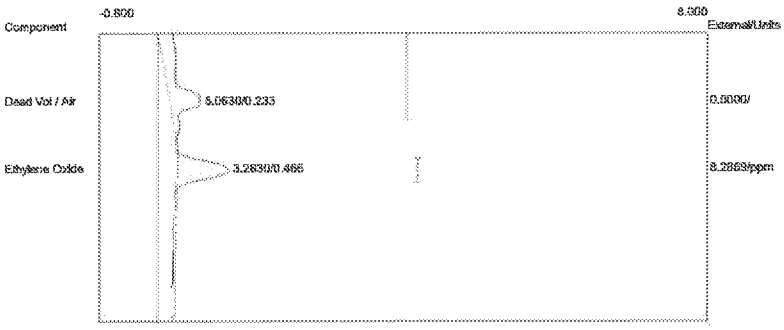
Ts	102	stack temperature (F)
Pb	29.15	barametreric pressure (in Hg)
ps	0.1	static pressure of stack (in H2O)

Bws(svp) = 7.03 %

APPENDIX E

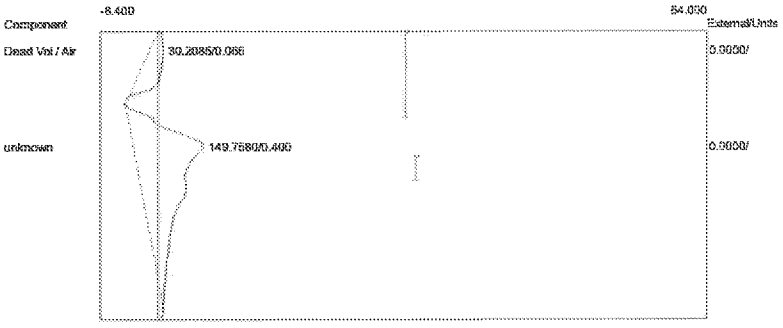
Chromatograms - Backvent

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Aeration
Analysis date: 09/20/2018 15:09:28
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-A01.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



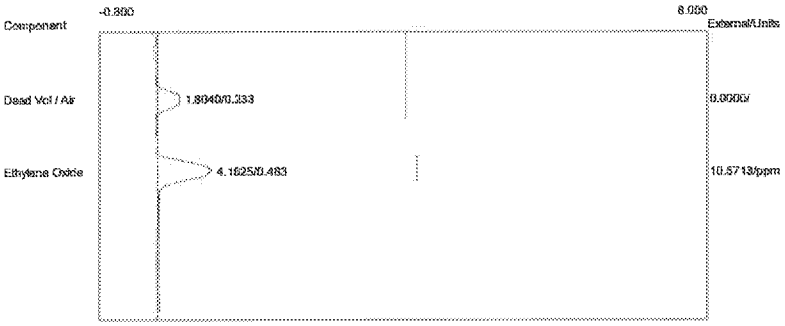
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	5.0630	0.0000	
Ethylene Oxide	0.466	3.2630	8.2869	ppm
		8.3260	8.2869	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Aeration
Analysis date: 09/20/2018 15:11:37
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-A02.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



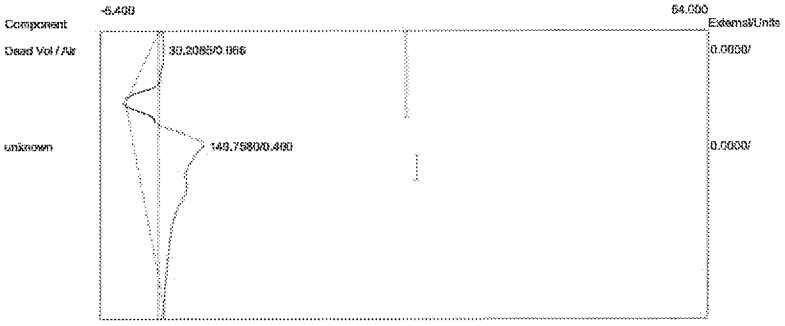
Component	Retention	Area	External	Units
Dead Vol / Air	0.066	30.2085	0.0000	
		30.2085	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Aeration
Analysis date: 09/20/2018 15:11:37
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-A02.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.8040	0.0000	
Ethylene Oxide	0.483	4.1625	10.5713	ppm
		5.9665	10.5713	

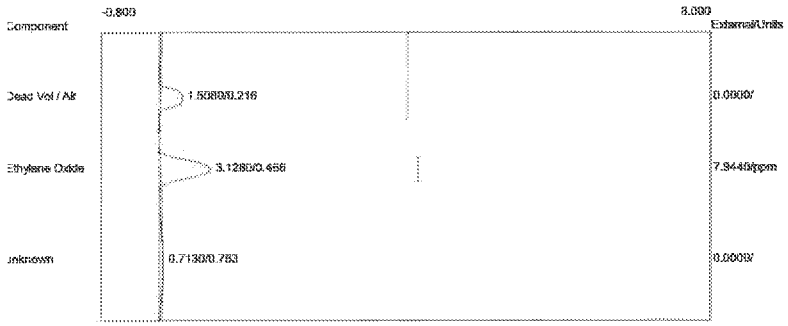
Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Aeration
Analysis date: 09/20/2018 15:11:37
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-A02.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



Component	Retention	Area	External	Units
Dead Vol / Air	0.066	30.2085	0.0000	
		30.2085	0.0000	

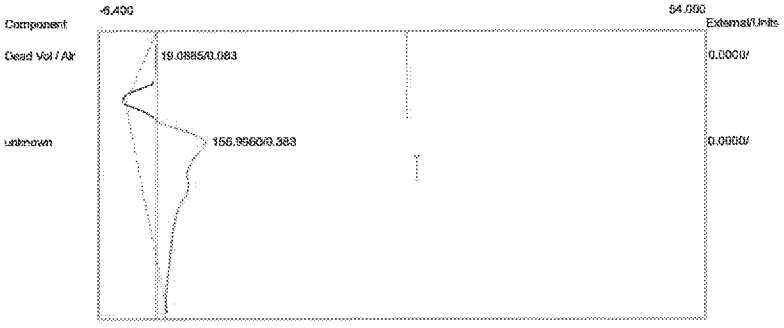
TEST RUN 1

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:39:20
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-1B01.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



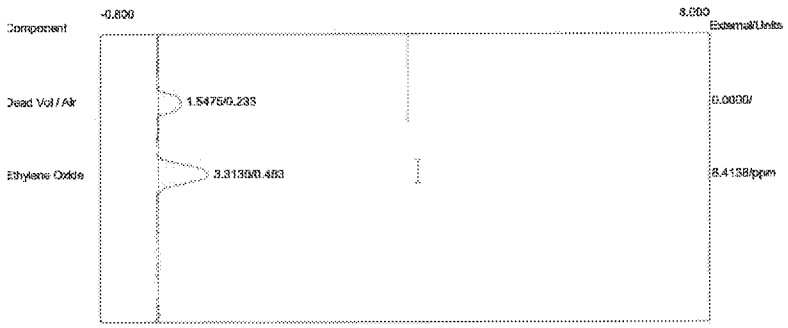
Component	Retention	Area	External	Units
Dead Vol / Air	0.216	1.5080	0.0000	
Ethylene Oxide	0.466	3.1280	7.9440	ppm
		4.6360	7.9440	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:39:20
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-1B01.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



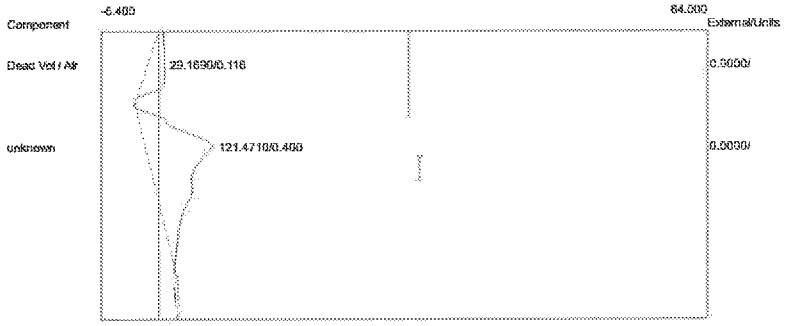
Component	Retention	Area	External	Units
Dead Vol / Air	0.083	19.0885	0.0000	
		19.0885	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:40:32
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-1B02.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



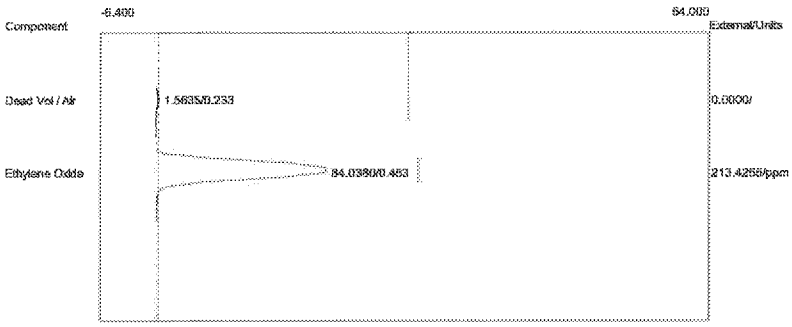
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.5475	0.0000	
Ethylene Oxide	0.483	3.3130	8.4138	ppm
		4.8605	8.4138	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:40:32
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-1B02.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



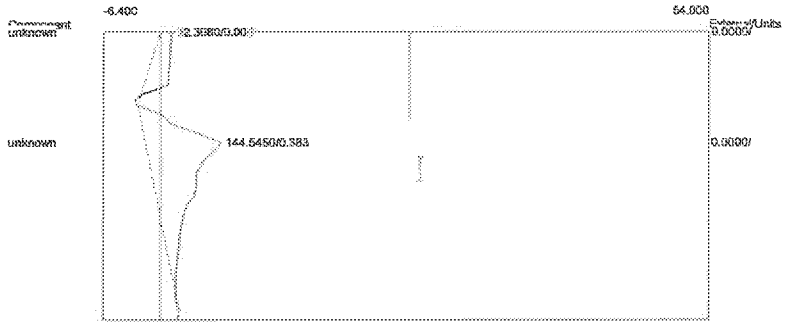
Component	Retention	Area	External	Units
Dead Vol / Air	0.116	29.1690	0.0000	
		29.1690	0.0000	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:41:42
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-1B03.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



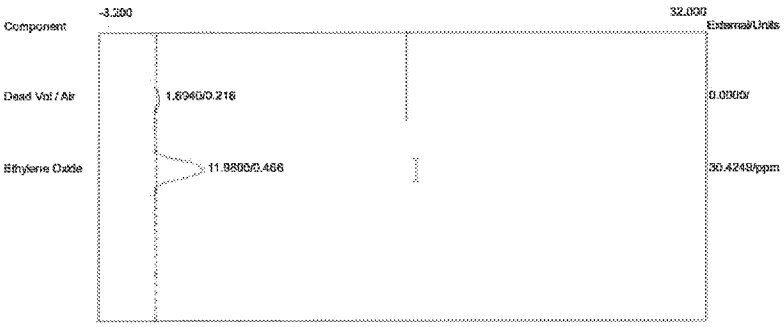
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.5635	0.0000	
Ethylene Oxide	0.483	84.0380	213.4265	ppm
		85.6015	213.4265	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:41:42
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-1B03.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



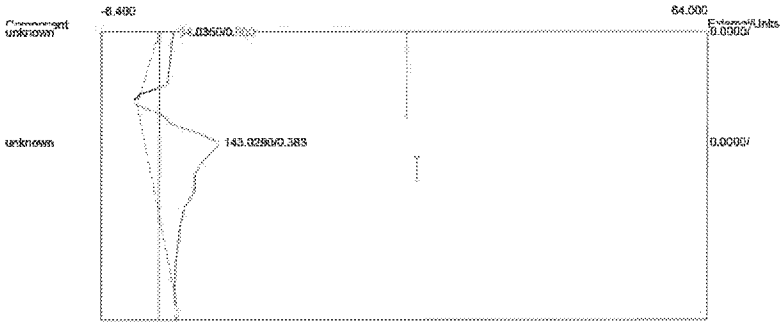
Component	Retention	Area	External	Units
		0.0000	0.0000	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:42:51
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-1B04.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



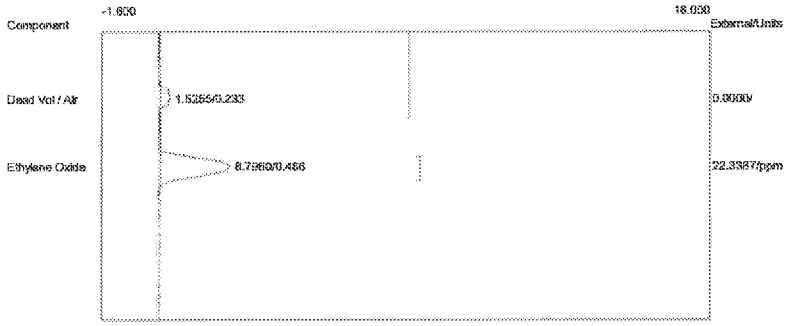
Component	Retention	Area	External	Units
Dead Vol / Air	0.216	1.6940	0.0000	
Ethylene Oxide	0.466	11.9800	30.4249	ppm
		13.6740	30.4249	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:42:51
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-1B04.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



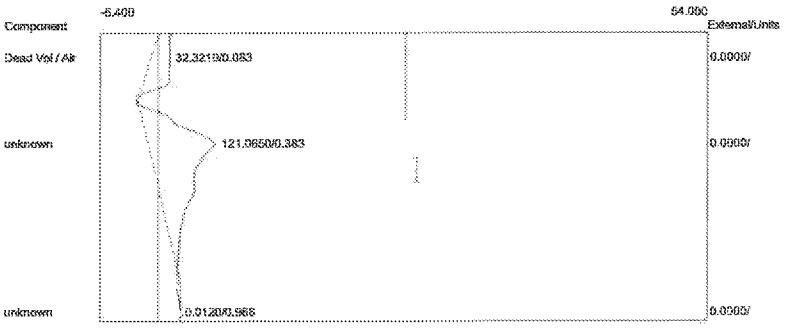
Component	Retention	Area	External	Units
		0.0000	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:44:03
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-1B05.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



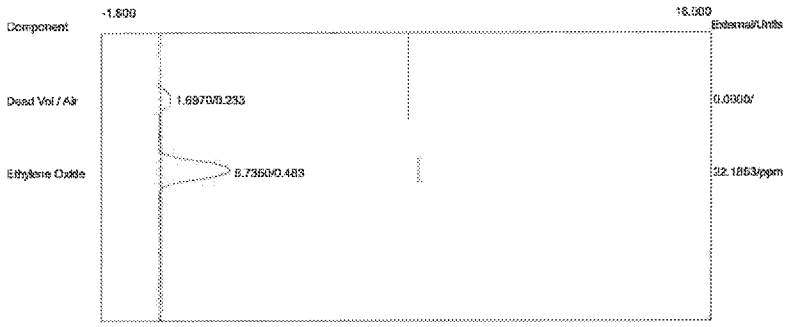
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.5255	0.0000	
Ethylene Oxide	0.466	8.7960	22.3387	ppm
		10.3215	22.3387	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:44:03
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-1B05.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



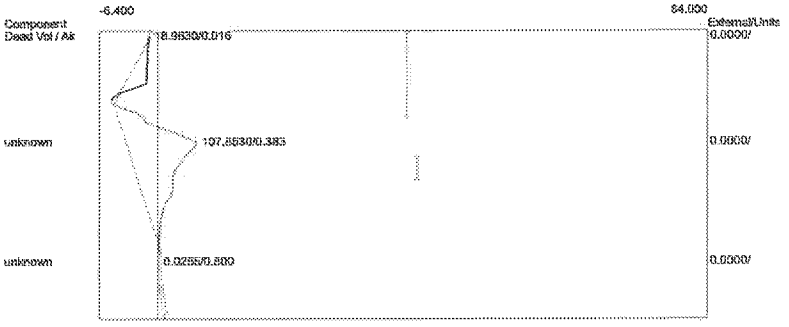
Component	Retention	Area	External	Units
Dead Vol / Air	0.083	32.3210	0.0000	
		32.3210	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:45:12
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-1B06.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



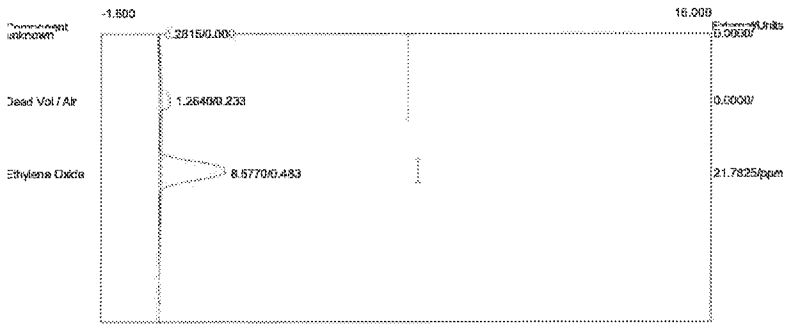
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.6970	0.0000	
Ethylene Oxide	0.483	8.7360	22.1863	ppm
		10.4330	22.1863	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:45:12
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-1B06.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



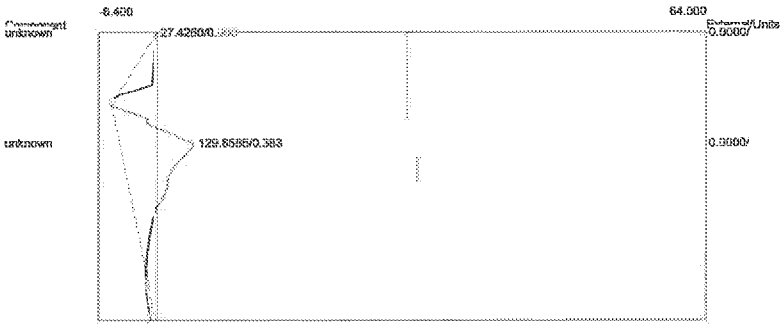
Component	Retention	Area	External	Units
Dead Vol / Air	0.016	18.9630	0.0000	
		18.9630	0.0000	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:46:20
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-1B07.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



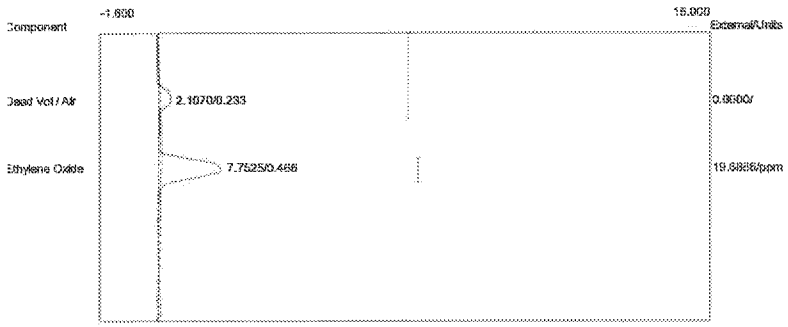
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.2640	0.0000	
Ethylene Oxide	0.483	8.5770	21.7825	ppm
		9.8410	21.7825	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:46:20
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-1B07.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



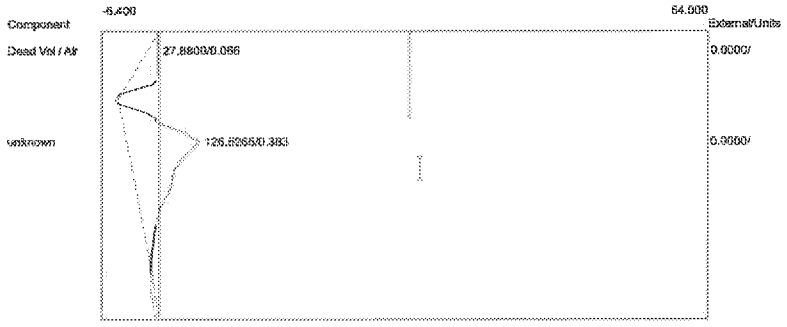
Component	Retention	Area	External	Units
		0.0000	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:47:29
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-1B08.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



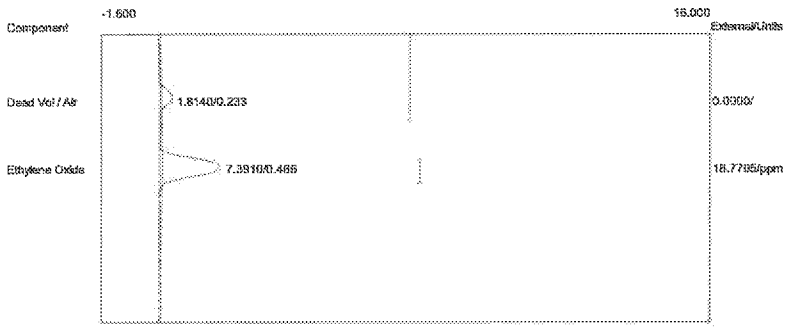
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	2.1070	0.0000	
Ethylene Oxide	0.466	7.7525	19.6886	ppm
		9.8595	19.6886	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:47:29
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-1B08.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



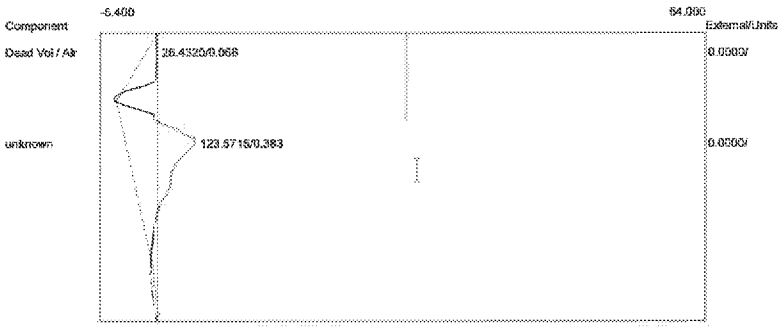
Component	Retention	Area	External	Units
Dead Vol / Air	0.066	27.8800	0.0000	
		27.8800	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:48:40
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-1B09.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.8140	0.0000	
Ethylene Oxide	0.466	7.3910	18.7705	ppm
		9.2050	18.7705	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:48:40
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-1B09.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer

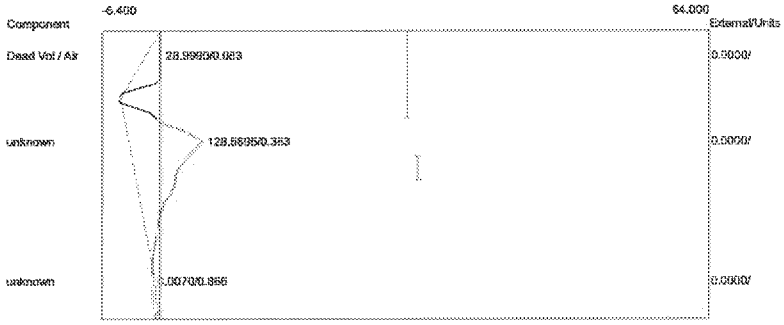


Component	Retention	Area	External	Units
Dead Vol / Air	0.066	26.4320	0.0000	
		26.4320	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:49:48
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-1B10.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer

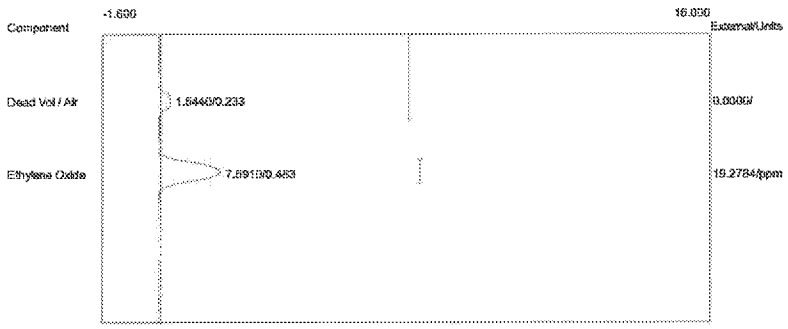
Component	Retention	Area	External	Units
Dead Vol / Air	0.216	2.0830	0.0000	
Ethylene Oxide	0.466	7.9955	20.3057	ppm
		10.0785	20.3057	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:49:48
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-1B10.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



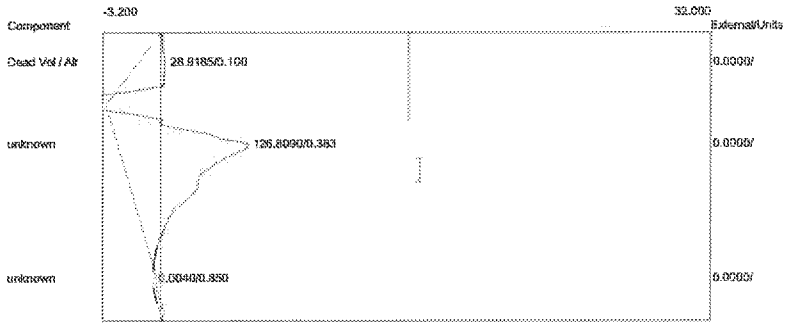
Component	Retention	Area	External	Units
Dead Vol / Air	0.083	28.9990	0.0000	
		28.9990	0.0000	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:50:59
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-1B11.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



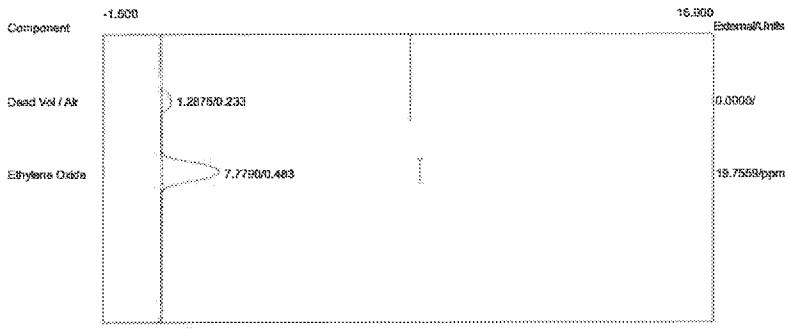
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.5440	0.0000	
Ethylene Oxide	0.483	7.5910	19.2784	ppm
		9.1350	19.2784	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:50:59
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-1B11.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



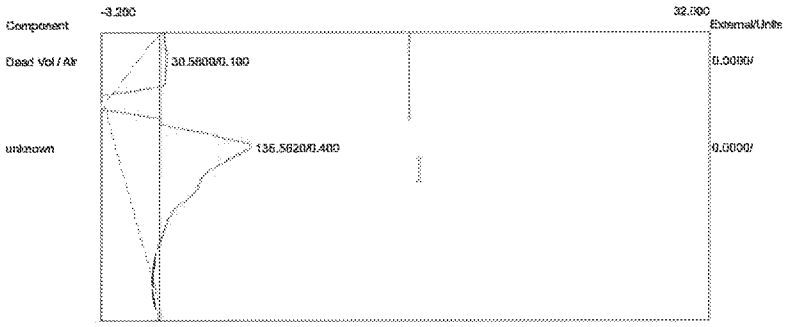
Component	Retention	Area	External	Units
Dead Vol / Air	0.100	28.9185	0.0000	
		28.9185	0.0000	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:52:07
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-1B12.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.2875	0.0000	
Ethylene Oxide	0.483	7.7790	19.7559	ppm
		9.0665	19.7559	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#1BV
Analysis date: 09/20/2018 15:52:07
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-1B12.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



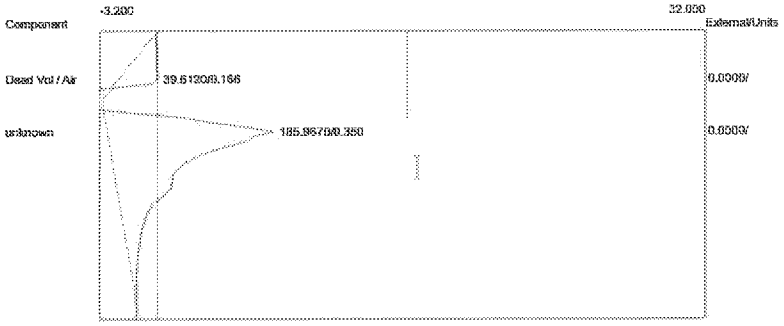
Component	Retention	Area	External	Units
Dead Vol / Air	0.100	30.5800	0.0000	
		30.5800	0.0000	

TEST RUN 2

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:17:00
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-2B01.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer

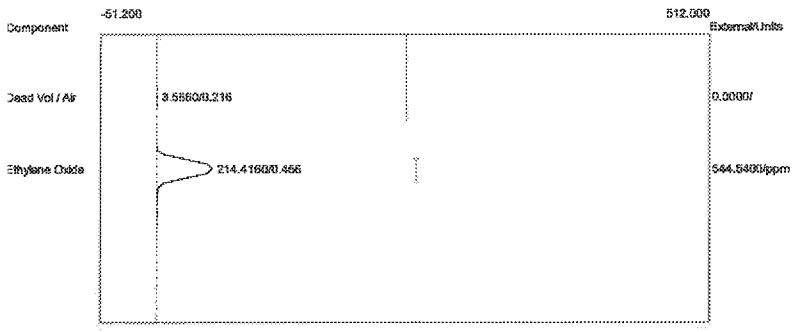
Component	Retention	Area	External	Units
Dead Vol / Air	0.216	1.5135	0.0000	
Ethylene Oxide	0.466	5.1000	12.9522	ppm
		6.6135	12.9522	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:17:00
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-2B01.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



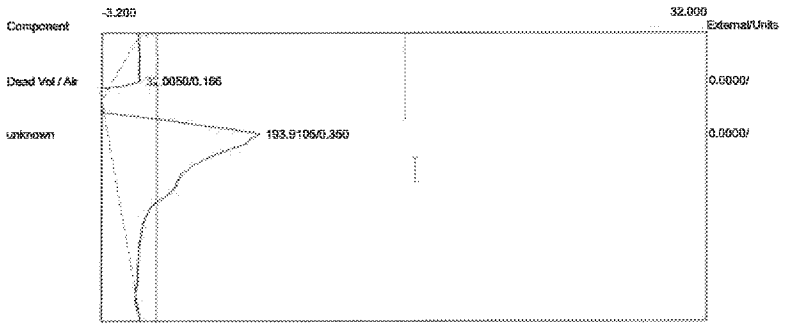
Component	Retention	Area	External	Units
Dead Vol / Air	0.166	39.6120	0.0000	
		39.6120	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:18:06
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-2B02.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



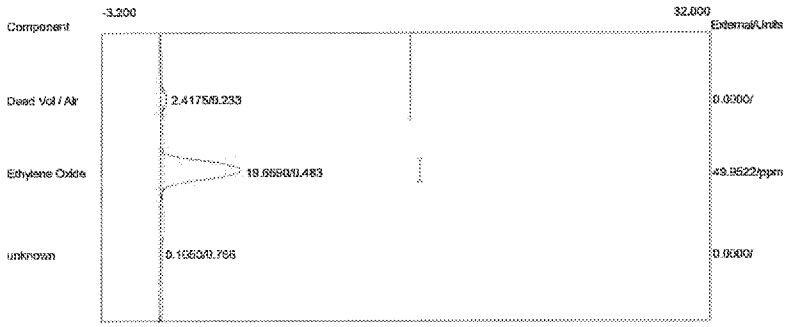
Component	Retention	Area	External	Units
Dead Vol / Air	0.216	3.5860	0.0000	
Ethylene Oxide	0.466	214.4160	544.5400	ppm
		218.0020	544.5400	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:18:06
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-2B02.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



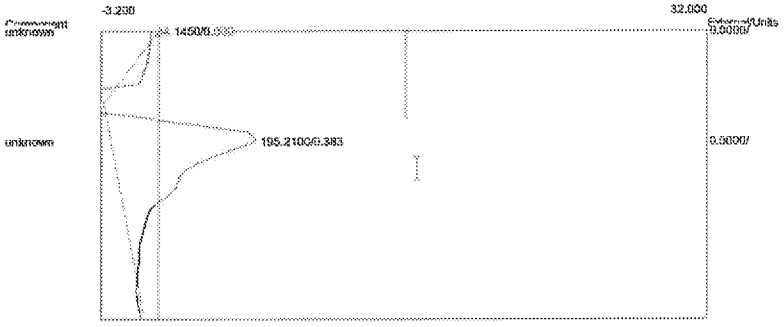
Component	Retention	Area	External	Units
Dead Vol / Air	0.166	32.0050	0.0000	
		32.0050	0.0000	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:19:13
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-2B03.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



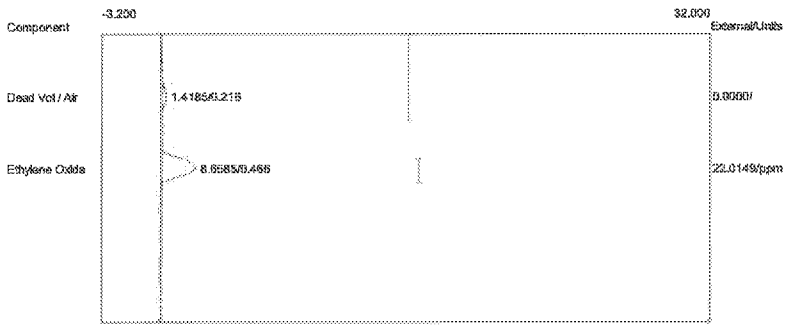
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	2.4175	0.0000	
Ethylene Oxide	0.483	19.6690	49.9522	ppm
		22.0865	49.9522	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:19:13
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-2B03.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



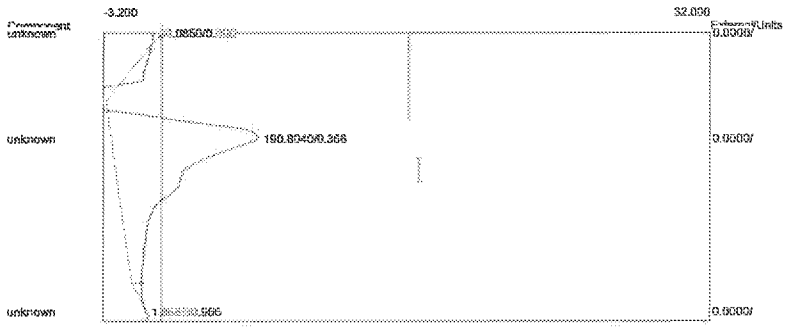
Component	Retention	Area	External	Units
		0.0000	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:20:20
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-2B04.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



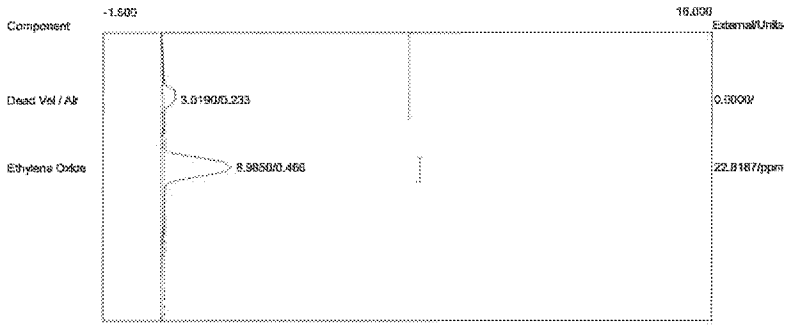
Component	Retention	Area	External	Units
Dead Vol / Air	0.216	1.4185	0.0000	
Ethylene Oxide	0.466	8.6685	22.0149	ppm
		10.0870	22.0149	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:20:20
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-2B04.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



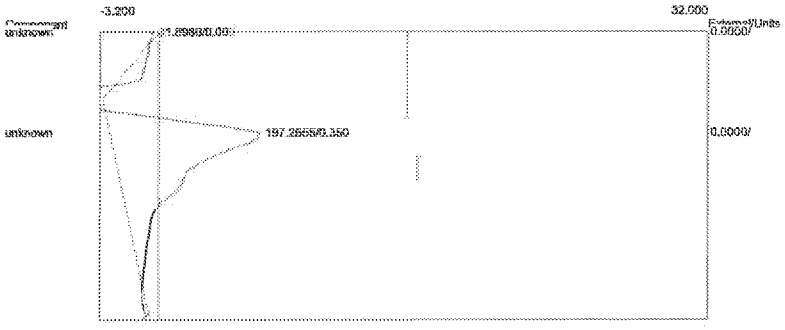
Component	Retention	Area	External	Units
		0.0000	0.0000	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:21:26
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-2B05.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



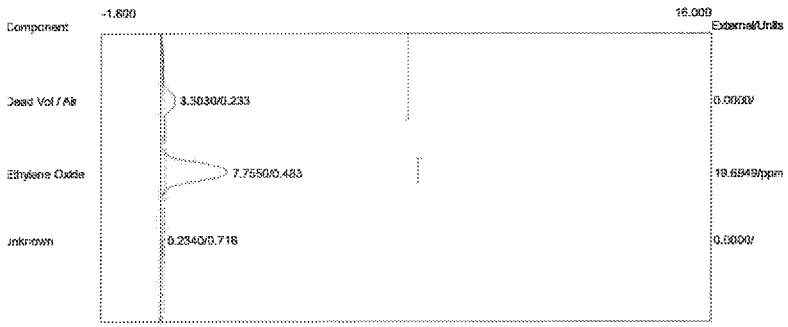
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	3.0190	0.0000	
Ethylene Oxide	0.466	8.9850	22.8187	ppm
		12.0040	22.8187	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:21:26
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-2B05.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



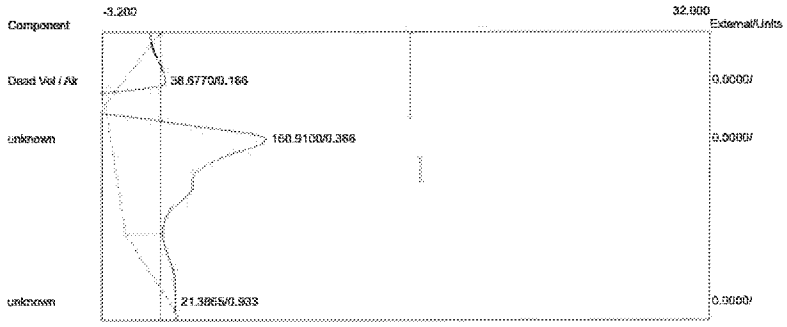
Component	Retention	Area	External	Units
		0.0000	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:22:48
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-2B06.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



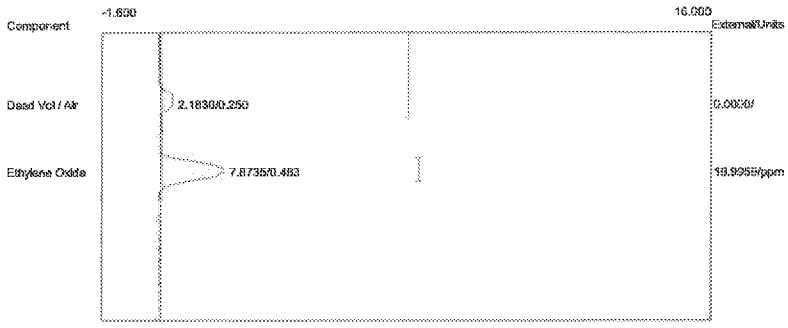
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	3.3030	0.0000	
Ethylene Oxide	0.483	7.7550	19.6949	ppm
		11.0580	19.6949	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:22:48
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-2B06.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



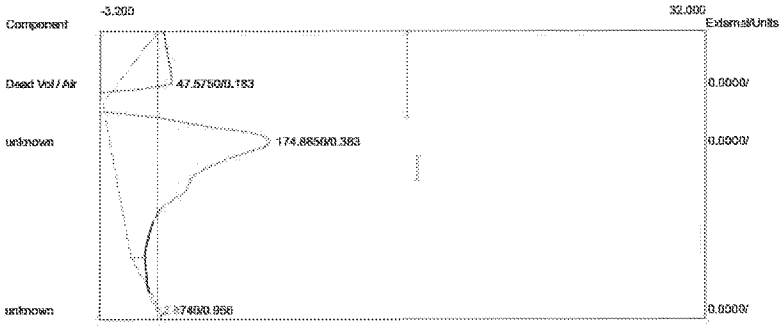
Component	Retention	Area	External	Units
Dead Vol / Air	0.166	38.6770	0.0000	
		38.6770	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:23:56
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-2B07.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



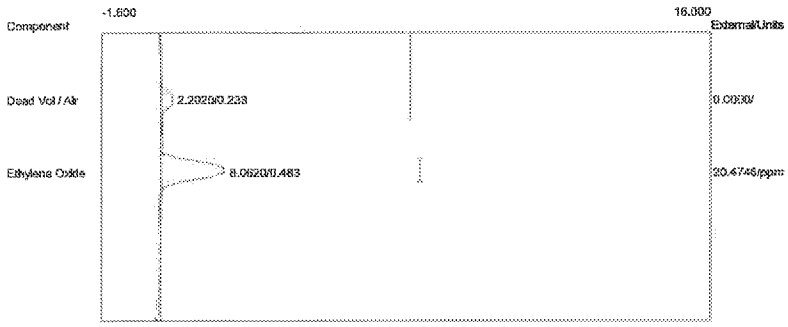
Component	Retention	Area	External	Units
Dead Vol / Air	0.250	2.1830	0.0000	
Ethylene Oxide	0.483	7.8735	19.9959	ppm
		10.0565	19.9959	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:23:56
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-2B07.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



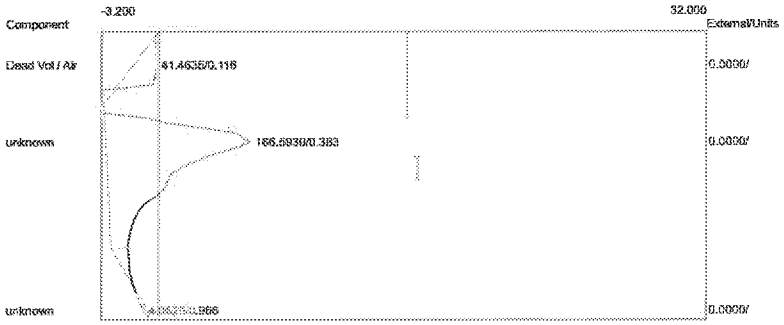
Component	Retention	Area	External	Units
Dead Vol / Air	0.183	47.5750	0.0000	
		47.5750	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:25:05
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-2B08.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



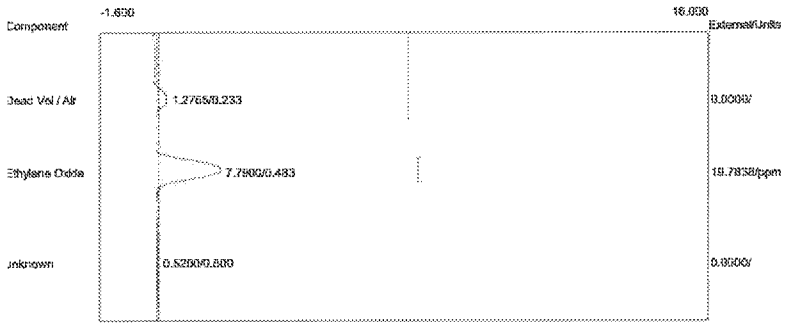
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	2.2020	0.0000	
Ethylene Oxide	0.483	8.0620	20.4746	ppm
		10.2640	20.4746	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:25:05
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-2B08.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



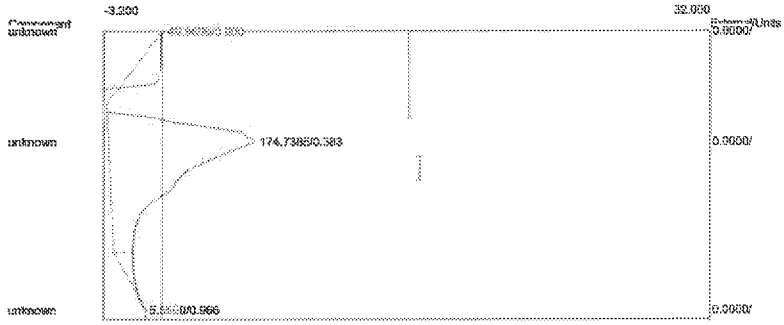
Component	Retention	Area	External	Units
Dead Vol / Air	0.116	41.4635	0.0000	
		41.4635	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:26:10
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-2B09.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



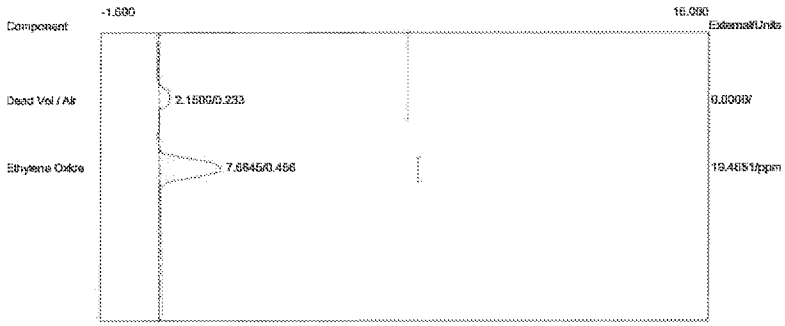
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.2765	0.0000	
Ethylene Oxide	0.483	7.7900	19.7838	ppm
		9.0665	19.7838	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:26:10
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-2B09.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



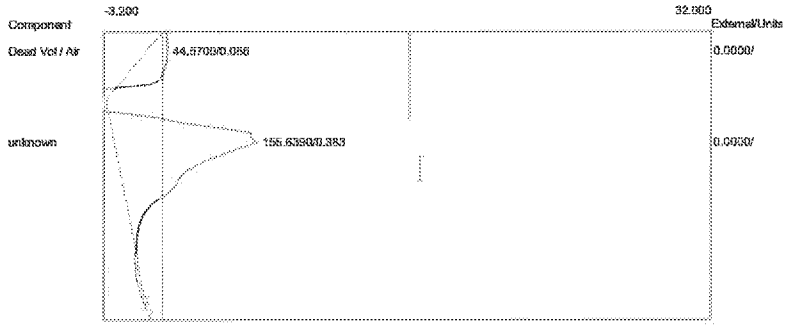
Component	Retention	Area	External	Units
		0.0000	0.0000	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:27:17
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-2B10.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



Component	Retention	Area	External	Units
Dead Vol / Air	0.233	2.1500	0.0000	
Ethylene Oxide	0.466	7.6645	19.4651	ppm
		9.8145	19.4651	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:27:17
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-2B10.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer

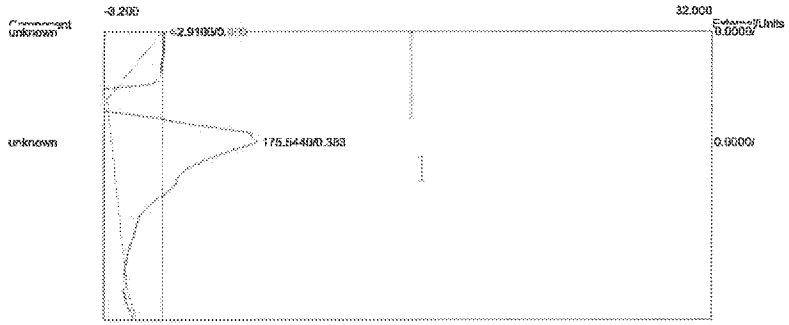


Component	Retention	Area	External	Units
Dead Vol / Air	0.066	44.5700	0.0000	
		44.5700	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:28:25
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-2B11.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer

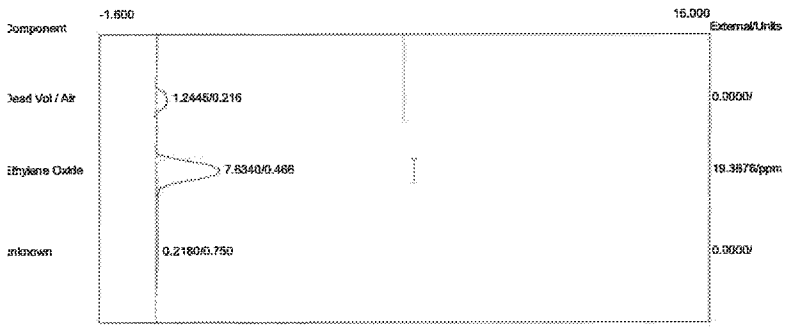
Component	Retention	Area	External	Units
Dead Vol / Air	0.216	1.5170	0.0000	
Ethylene Oxide	0.466	8.3910	21.3101	ppm
		9.9080	21.3101	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:28:25
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-2B11.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



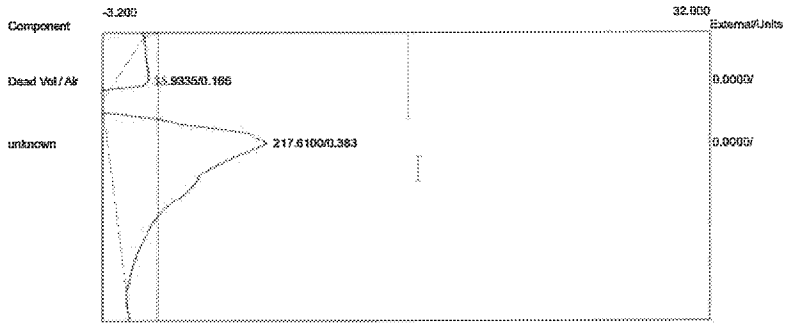
Component	Retention	Area	External	Units
		0.0000	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:29:31
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-2B12.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



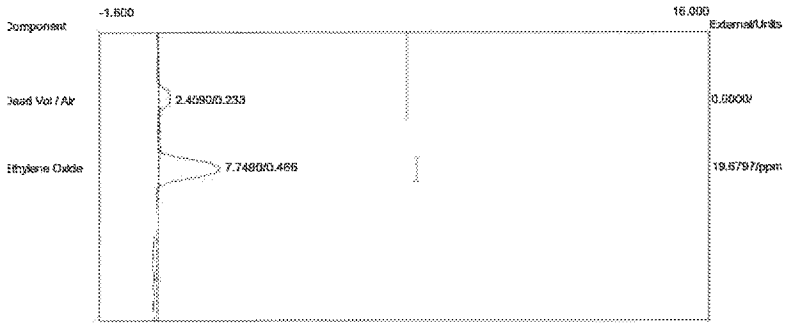
Component	Retention	Area	External	Units
Dead Vol / Air	0.216	1.2445	0.0000	
Ethylene Oxide	0.466	7.6340	19.3876	ppm
		8.8785	19.3876	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:29:31
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-2B12.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



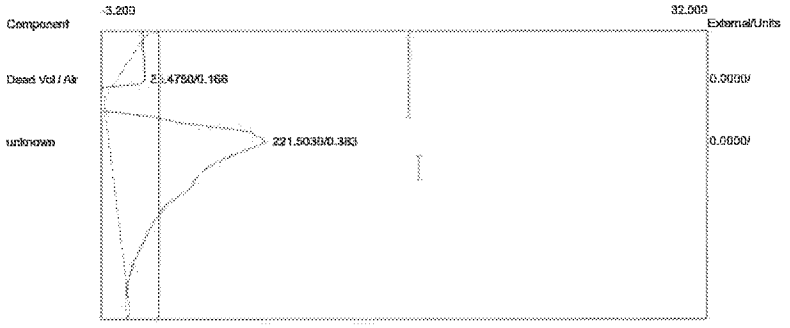
Component	Retention	Area	External	Units
Dead Vol / Air	0.166	35.9335	0.0000	
		35.9335	0.0000	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:30:38
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-2B13.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



Component	Retention	Area	External	Units
Dead Vol / Air	0.233	2.4090	0.0000	
Ethylene Oxide	0.466	7.7490	19.6797	ppm
		10.1580	19.6797	

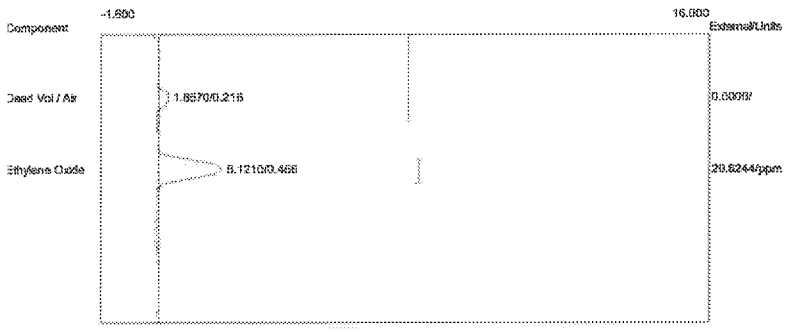
Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: Run#2BV
Analysis date: 09/20/2018 16:30:38
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-2B13.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



Component	Retention	Area	External	Units
Dead Vol / Air	0.166	35.4780	0.0000	
		35.4780	0.0000	

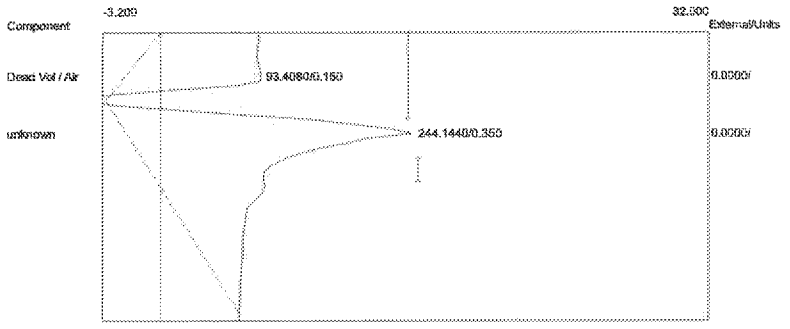
TEST RUN 3

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:51:01
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-3B01.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



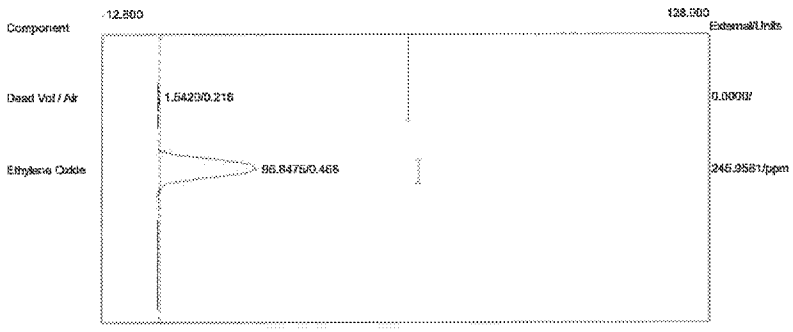
Component	Retention	Area	External	Units
Dead Vol / Air	0.216	1.8570	0.0000	
Ethylene Oxide	0.466	8.1210	20.6244	ppm
		9.9780	20.6244	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:51:01
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-3B01.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



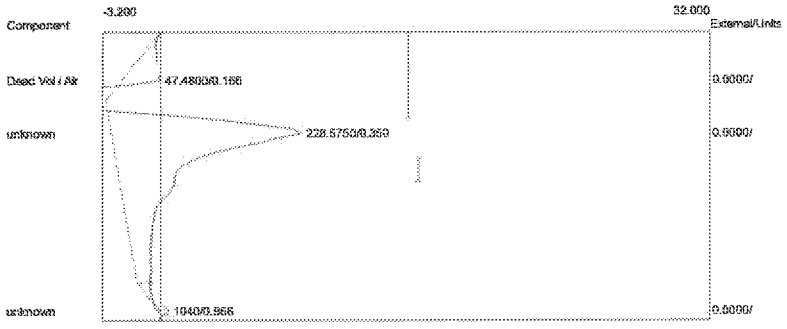
Component	Retention	Area	External	Units
Dead Vol / Air	0.150	93.4080	0.0000	
		93.4080	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:52:10
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-3B02.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



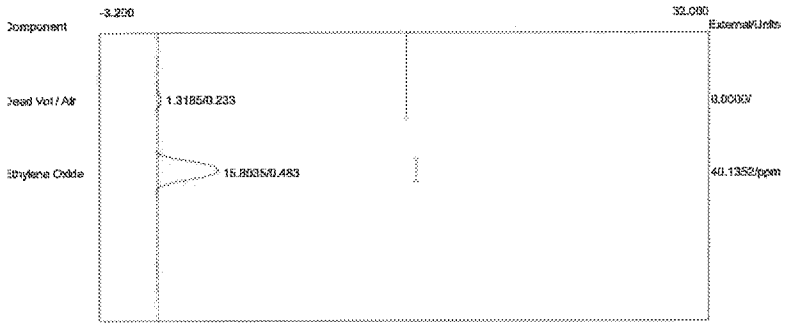
Component	Retention	Area	External	Units
Dead Vol / Air	0.216	1.5420	0.0000	
Ethylene Oxide	0.466	96.8475	245.9581	ppm
		98.3895	245.9581	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:52:10
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-3B02.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



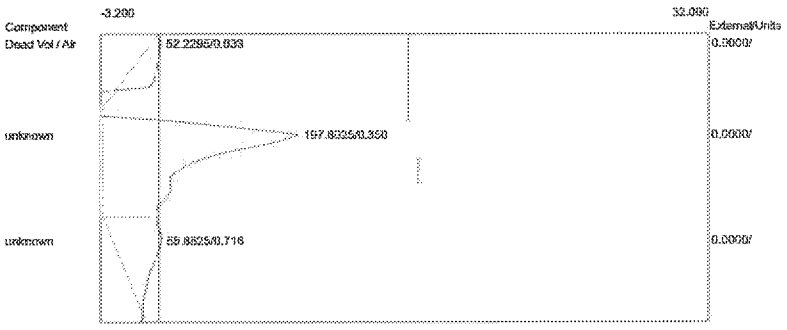
Component	Retention	Area	External	Units
Dead Vol / Air	0.166	47.4800	0.0000	
		47.4800	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:53:38
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-3B03.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



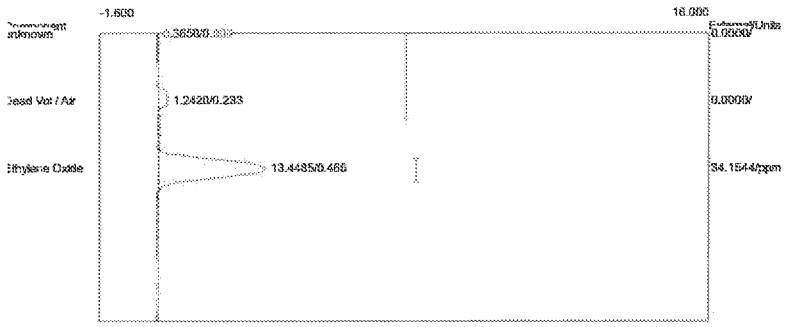
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.3185	0.0000	
Ethylene Oxide	0.483	15.8035	40.1352	ppm
		17.1220	40.1352	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:53:38
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-3B03.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



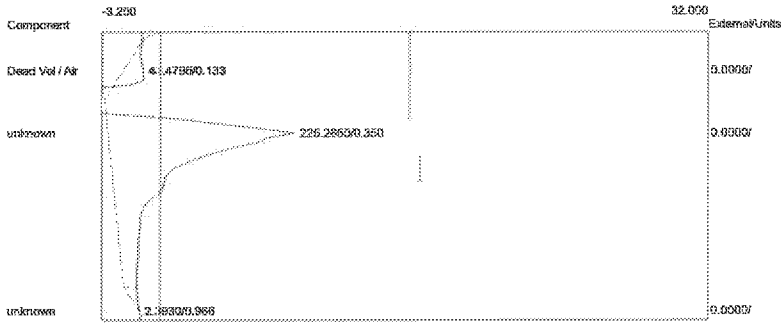
Component	Retention	Area	External	Units
Dead Vol / Air	0.033	52.2295	0.0000	
		52.2295	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:54:45
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-3B04.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



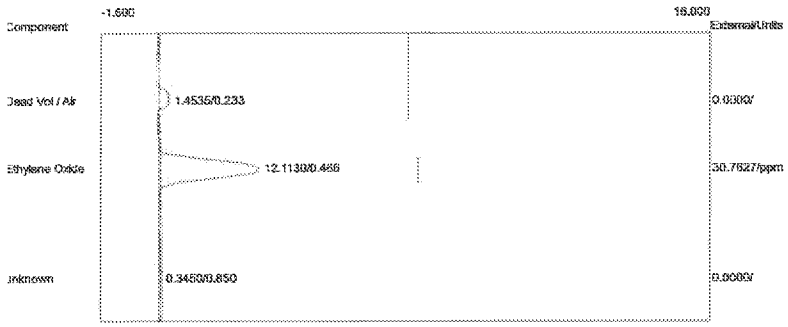
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.2420	0.0000	
Ethylene Oxide	0.466	13.4485	34.1544	ppm
		14.6905	34.1544	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:54:45
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-3B04.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



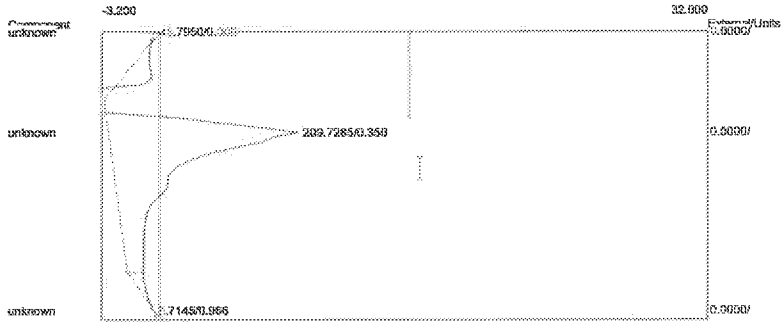
Component	Retention	Area	External	Units
Dead Vol / Air	0.133	43.4795	0.0000	
		43.4795	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:55:55
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-3B05.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



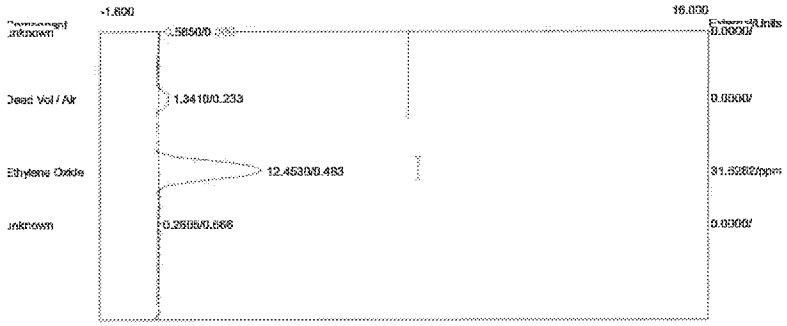
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.4535	0.0000	
Ethylene Oxide	0.466	12.1130	30.7627	ppm
		13.5665	30.7627	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:55:55
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-3B05.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



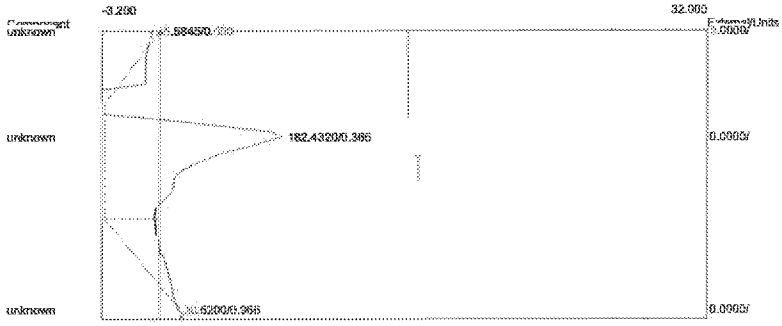
Component	Retention	Area	External	Units
		0.0000	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:57:02
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-3B06.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



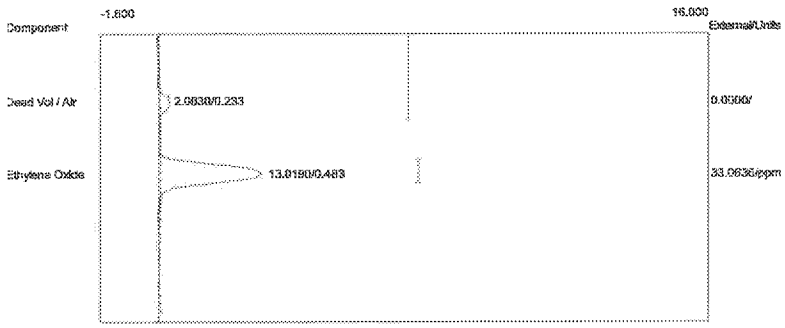
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.3410	0.0000	
Ethylene Oxide	0.483	12.4530	31.6262	ppm
		13.7940	31.6262	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:57:02
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-3B06.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



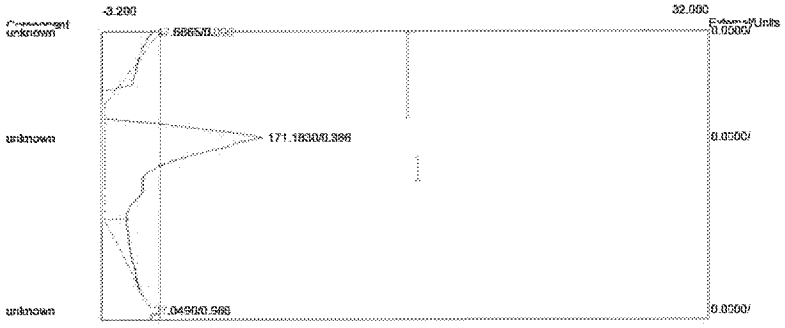
Component	Retention	Area	External	Units
		0.0000	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:58:12
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-3B07.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



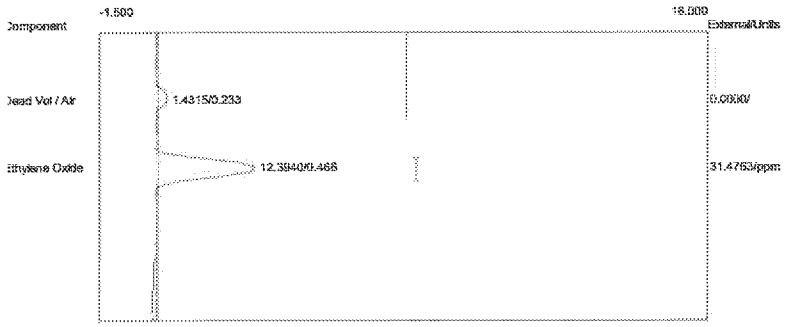
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	2.0030	0.0000	
Ethylene Oxide	0.483	13.0190	33.0636	ppm
		15.0220	33.0636	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:58:12
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-3B07.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



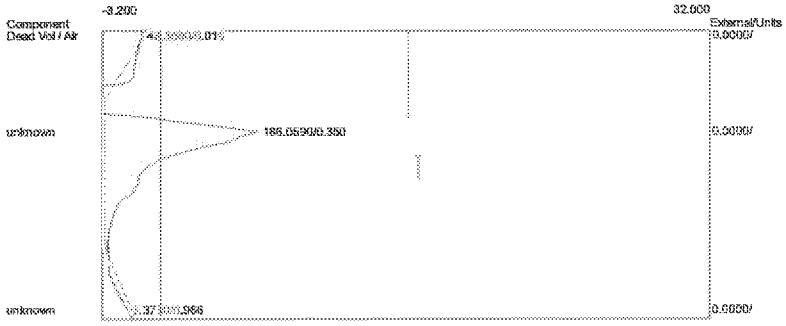
Component	Retention	Area	External	Units
		0.0000	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:59:22
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-3B08.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



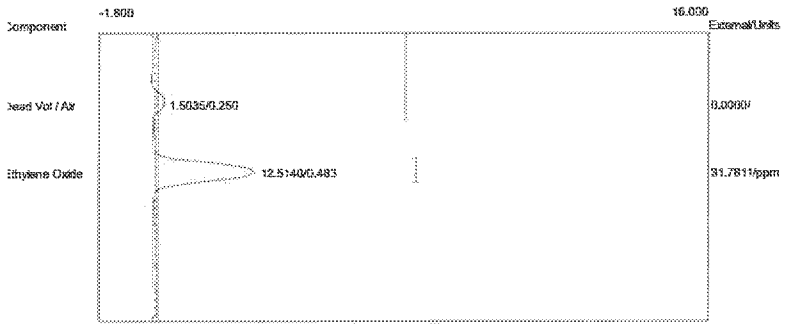
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.4315	0.0000	
Ethylene Oxide	0.466	12.3940	31.4763	ppm
		13.8255	31.4763	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 16:59:22
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-3B08.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



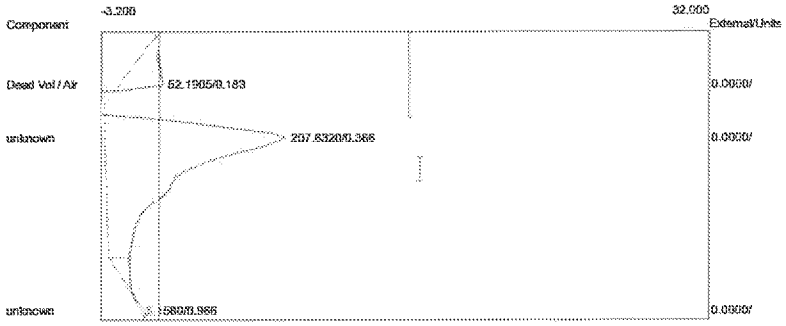
Component	Retention	Area	External	Units
Dead Vol / Air	0.016	43.3000	0.0000	
		43.3000	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 17:00:31
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-3B09.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



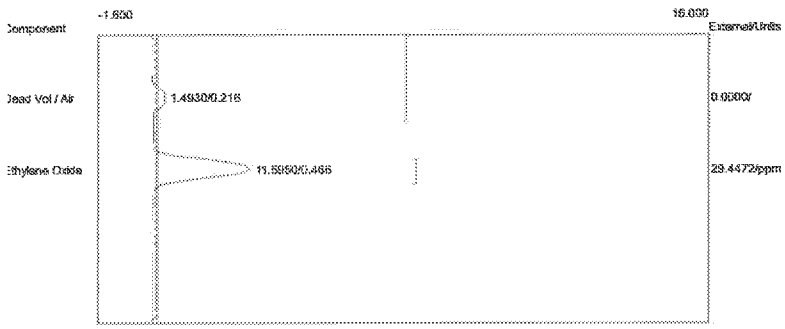
Component	Retention	Area	External	Units
Dead Vol / Air	0.250	1.5035	0.0000	
Ethylene Oxide	0.483	12.5140	31.7811	ppm
		14.0175	31.7811	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 17:00:31
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-3B09.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



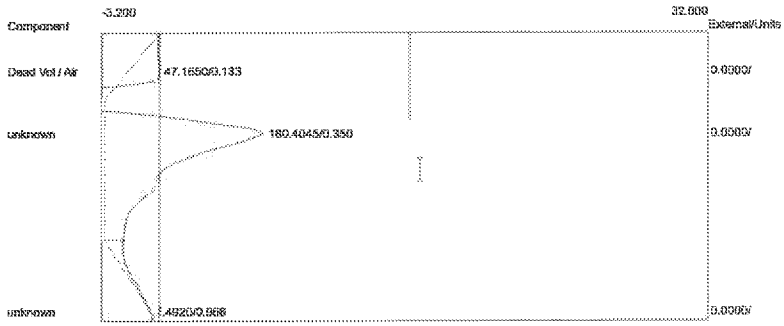
Component	Retention	Area	External	Units
Dead Vol / Air	0.183	52.1905	0.0000	
		52.1905	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 17:01:45
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-3B10.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



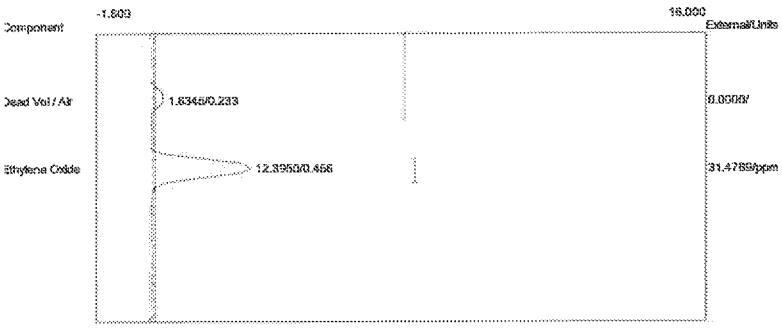
Component	Retention	Area	External	Units
Dead Vol / Air	0.216	1.4930	0.0000	
Ethylene Oxide	0.466	11.5950	29.4472	ppm
		13.0880	29.4472	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 17:01:45
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-3B10.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



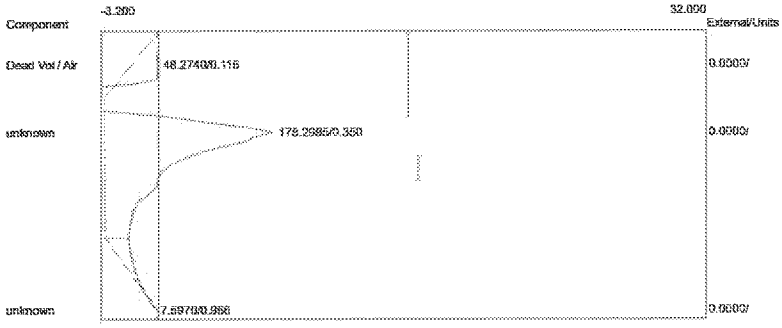
Component	Retention	Area	External	Units
Dead Vol / Air	0.133	47.1650	0.0000	
		47.1650	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 17:02:56
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-3B11.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



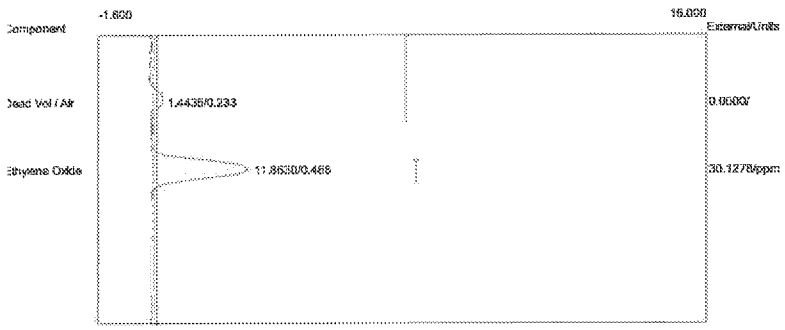
Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.6345	0.0000	
Ethylene Oxide	0.466	12.3950	31.4789	ppm
		14.0295	31.4789	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 17:02:56
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-3B11.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



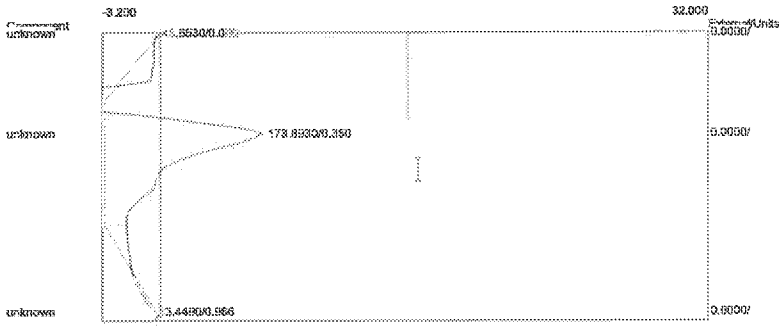
Component	Retention	Area	External	Units
Dead Vol / Air	0.116	48.2740	0.0000	
		48.2740	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 17:04:06
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-3B12.CHR (c:\peak359)
Sample: AAT Inlet
Operator: D. Kremer



Component	Retention	Area	External	Units
Dead Vol / Air	0.233	1.4435	0.0000	
Ethylene Oxide	0.466	11.8630	30.1278	ppm
		13.3065	30.1278	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: Run#3BV
Analysis date: 09/20/2018 17:04:06
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-3B12.CHR (c:\peak359)
Sample: AAT Outlet
Operator: D. Kremer



Component	Retention	Area	External	Units
		0.0000	0.0000	

APPENDIX F

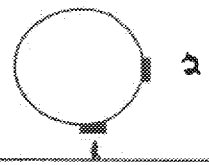
Field Data

ECSI, INC. - VELOCITY TRAVERSE DATA

Client: Sterigenics | Run #: 1 | Date: 9/20/18 | Port Sketch:

Location: Willowbrook - Plant 2 | Probe Type: Std. | Baro Press: ~~20.35~~ 29.15

Source: AAT Safe Cell System Inlet | Stack I.D.: 28 in. | DSCFM:



	Port 1							Port 2						
Inches From Port	Point#	Delta P Low	Delta P High	Delta P Average	Delta P Sq Root	Stack Temp (F)	Cyclonic Angle	Point#	Delta P Low	Delta P High	Delta P Average	Delta P Sq Root	Stack Temp (F)	Cyclonic Angle
0.5	1	0.40	0.40	#DIV/0!	#DIV/0!	88.2	7.2	1	0.50	0.50	#DIV/0!	#DIV/0!	90.4	4.7
1.9	2	0.25	0.25	#DIV/0!	#DIV/0!	88.2	6.3	2	0.25	0.25	#DIV/0!	#DIV/0!	89.9	5.4
3.3	3	0.20	0.20	#DIV/0!	#DIV/0!	88.5	3.4	3	0.30	0.30	#DIV/0!	#DIV/0!	93.3	4.8
4.9	4	0.25	0.25	#DIV/0!	#DIV/0!	91.2	4.8	4	0.35	0.35	#DIV/0!	#DIV/0!	95.4	3.6
7.0	5	0.25	0.25	#DIV/0!	#DIV/0!	93.5	3.6	5	0.40	0.40	#DIV/0!	#DIV/0!	96.7	3.2
10.0	6	0.35	0.35	#DIV/0!	#DIV/0!	95.8	4.7	6	0.45	0.45	#DIV/0!	#DIV/0!	97.4	2.1
18.0	7	0.45	0.45	#DIV/0!	#DIV/0!	95.6	3.8	7	0.45	0.45	#DIV/0!	#DIV/0!	96.7	4.8
21.0	8	0.45	0.45	#DIV/0!	#DIV/0!	96.7	3.7	8	0.47	0.47	#DIV/0!	#DIV/0!	97.6	3.9
23.1	9	0.45	0.45	#DIV/0!	#DIV/0!	97.4	5.1	9	0.40	0.45	#DIV/0!	#DIV/0!	98.0	5.1
24.7	10	0.45	0.45	#DIV/0!	#DIV/0!	97.9	4.5	10	0.45	0.45	#DIV/0!	#DIV/0!	98.4	5.4
26.1	11	0.45	0.45	#DIV/0!	#DIV/0!	98.2	3.6	11	0.48	0.48	#DIV/0!	#DIV/0!	98.4	3.8
27.5	12	0.30	0.30	#DIV/0!	#DIV/0!	97.4	2.2	12	0.35	0.35	#DIV/0!	#DIV/0!	98.3	2.0
	13							13						
	14							14						
	15							15						
	16							16						
	17							17						
	18							18						
	19							19						
	20							20						
	21							21						
	22							22						
	23							23						
	24							24						
								Average Values:			#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

*Stack static pressure measured at -0.35" H_2O

*Pitot tube P-6-4 (S-type) was leak checked @ 2" H_2O, max scale on the manometer

EPA-HQ-2019-004008

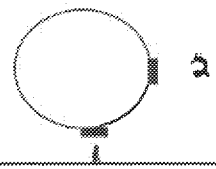
ED_002408_00013961-00107

ECSI, INC. - VELOCITY TRAVERSE DATA

Client: Sterigenics | Run #: 1 | Date: 9/8/2018 | Port Sketch:

Location: Willowbrook - Plant 2 | Probe Type: Std. | Baro Press: 29.35

Source: AAT Safe Cell System Inlet | Stack I.D.: 28 in. | DSCFM:



	Port 1							Port 2						
Inches		Delta P				Stack	Cyclonic		Delta P				Stack	Cyclonic
From Port	Point#	Low	High	Average	Sq Root	Temp (F)	Angle	Point#	Low	High	Average	Sq Root	Temp (F)	Angle
0.5	1	0.40	0.40	#DIV/0!	#DIV/0!	88.2	7.2	1	0.50	0.50	#DIV/0!	#DIV/0!	90.4	4.7
1.9	2	0.25	0.25	#DIV/0!	#DIV/0!	88.2	6.3	2	0.25	0.25	#DIV/0!	#DIV/0!	89.9	5.4
3.3	3	0.20	0.20	#DIV/0!	#DIV/0!	88.5	3.4	3	0.30	0.30	#DIV/0!	#DIV/0!	93.3	4.8
4.9	4	0.25	0.25	#DIV/0!	#DIV/0!	91.2	4.8	4	0.35	0.35	#DIV/0!	#DIV/0!	95.4	3.6
7.0	5	0.25	0.25	#DIV/0!	#DIV/0!	93.5	3.6	5	0.40	0.40	#DIV/0!	#DIV/0!	96.7	3.2
10.0	6	0.35	0.35	#DIV/0!	#DIV/0!	95.8	4.7	6	0.45	0.45	#DIV/0!	#DIV/0!	97.4	2.1
18.0	7	0.45	0.45	#DIV/0!	#DIV/0!	95.6	3.8	7	0.45	0.45	#DIV/0!	#DIV/0!	96.7	4.8
21.0	8	0.45	0.45	#DIV/0!	#DIV/0!	96.7	3.7	8	0.47	0.47	#DIV/0!	#DIV/0!	97.6	3.9
23.1	9	0.45	0.45	#DIV/0!	#DIV/0!	97.4	5.1	9	0.40	0.45	#DIV/0!	#DIV/0!	98.0	5.1
24.7	10	0.45	0.45	#DIV/0!	#DIV/0!	97.9	4.5	10	0.45	0.45	#DIV/0!	#DIV/0!	98.4	5.4
26.1	11	0.45	0.45	#DIV/0!	#DIV/0!	98.2	3.6	11	0.48	0.48	#DIV/0!	#DIV/0!	98.4	3.8
27.5	12	0.30	0.30	#DIV/0!	#DIV/0!	97.4	2.2	12	0.35	0.35	#DIV/0!	#DIV/0!	98.3	2.0
	13							13						
	14							14						
	15							15						
	16							16						
	17							17						
	18							18						
	19							19						
	20							20						
	21							21						
	22							22						
	23							23						
	24							24						
								Average Values:			#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

*Pitot tube P-6-4 (S type) was leak checked @ 2" H_2O, max scale on the manometer

ED_002408_00013961-00108

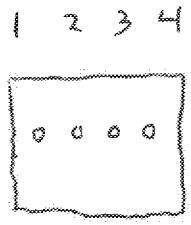
EPA-HQ-2019-004008

ECSI, INC. - VELOCITY TRAVERSE DATA

Client: Sterigenics | Run #: 1 | Date: ~~9/20/2018~~ 9/20/18 | Port Sketch:

Location: Willowbrook - Plant 2 | Probe Type: Std. | Baro Press: ~~29.00~~ 29.15

Source: AAT Safe Cell System Outlet | Stack I.D.: 28x28 = 5.4444 | DSCFM:



Port 1 & 2								Port 3 & 4						
Inches From Port	Point#	Delta P Low	Delta P High	Delta P Average	Delta P Sq Root	Stack Temp (F)	Cyclonic Angle	Point#	Delta P Low	Delta P High	Delta P Average	Delta P Sq Root	Stack Temp (F)	Cyclonic Angle
3.5	1	0.5	.5	#DIV/0!	#DIV/0!	100.5	3.9	1	0.3	0.3	#DIV/0!	#DIV/0!	99.9	4.4
7.0	2	0.55	0.55	#DIV/0!	#DIV/0!	102.2	3.9	2	0.25	0.25	#DIV/0!	#DIV/0!	101.5	5.4
10.5	3	0.6	0.6	#DIV/0!	#DIV/0!	102.2	2.6	3	0.25	0.25	#DIV/0!	#DIV/0!	102.2	5.6
14.0	4	~~0.6~~ 0.6	~~0.6~~ 0.6	#DIV/0!	#DIV/0!	102.2	2.6	4	0.20	0.20	#DIV/0!	#DIV/0!	102.4	3.1
17.5	5	0.55	0.55	#DIV/0!	#DIV/0!	102.1	2.5	5	0.15	0.15	#DIV/0!	#DIV/0!	102.3	1.8
21.0	6	0.6	0.6	#DIV/0!	#DIV/0!	102.1	2.1	6	0.20	0.20	#DIV/0!	#DIV/0!	102.4	2.5
24.5	7	0.6	0.6	#DIV/0!	#DIV/0!	102.1	3.8	7	0.20	0.20	#DIV/0!	#DIV/0!	102.3	2.0
3.5	1	0.4	0.4	#DIV/0!	#DIV/0!	99.4	1.1	1	0.15	0.15	#DIV/0!	#DIV/0!	101.0	4.2
7.0	2	0.4	0.4	#DIV/0!	#DIV/0!	101.4	6.2	2	0.15	0.15	#DIV/0!	#DIV/0!	101.8	5.0
10.5	3	0.4	0.4	#DIV/0!	#DIV/0!	102.2	2.0	3	0.10	0.10	#DIV/0!	#DIV/0!	101.7	1.2
14.0	4	0.3	0.3	#DIV/0!	#DIV/0!	102.3	4.4	4	0.10	0.10	#DIV/0!	#DIV/0!	102.3	4.7
17.5	5	0.3	0.3	#DIV/0!	#DIV/0!	102.2	4.7	5	0.10	0.10	#DIV/0!	#DIV/0!	102.4	1.8
21.0	6	0.4	0.4	#DIV/0!	#DIV/0!	102.3	5.1	6	0.10	0.10	#DIV/0!	#DIV/0!	102.4	0.8
24.5	7	0.4	0.4	#DIV/0!	#DIV/0!	102.3	4.6	7	0.10	0.10	#DIV/0!	#DIV/0!	102.0	2.5
											Average Values:	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

* Stack static pressure measured at 0.1" H_2O
* Pitot tube P-4-2 (S-type) was leak checked @ 2" H_2O, max scale on the manometer
* Pitot tube Std-1 (std.) was leak checked @ 2" H_2O, max scale on the manometer

EPA-HQ-2019-004008

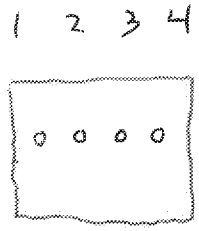
ED_002408_00013961-00109

ECSI, INC. - VELOCITY TRAVERSE DATA

Client: Sterigenics | Run #: 1 | Date: 9/8/2018 | Port Sketch:

Location: Willowbrook - Plant 2 | Probe Type: Std. | Baro Press: 29.35

Source: AAT Safe Cell System Outlet | Stack I.D.: 28x28 | DSCFM:



	Port 1 & 2							Port 3 & 4						
Inches From Port	Point#	Delta P Low	Delta P High	Delta P Average	Delta P Sq Root	Stack Temp (F)	Cyclonic Angle	Point#	Delta P Low	Delta P High	Delta P Average	Delta P Sq Root	Stack Temp (F)	Cyclonic Angle
3.5	1	0.5	.5	#DIV/0!	#DIV/0!	100.5	3.9	1	0.3	0.3	#DIV/0!	#DIV/0!	99.9	4.4
7.0	2	0.55	0.55	#DIV/0!	#DIV/0!	102.2	3.9	2	0.25	0.25	#DIV/0!	#DIV/0!	101.5	5.4
10.5	3	0.6	0.6	#DIV/0!	#DIV/0!	102.2	2.6	3	0.25	0.25	#DIV/0!	#DIV/0!	102.2	5.6
14.0	4	~~0.6~~ 0.6	~~0.6~~ 0.6	#DIV/0!	#DIV/0!	102.2	2.6	4	0.20	0.20	#DIV/0!	#DIV/0!	102.4	3.1
17.5	5	0.55	0.55	#DIV/0!	#DIV/0!	102.1	2.5	5	0.15	0.15	#DIV/0!	#DIV/0!	102.3	1.8
21.0	6	0.6	0.6	#DIV/0!	#DIV/0!	102.1	2.1	6	0.20	0.20	#DIV/0!	#DIV/0!	102.4	2.5
24.5	7	0.6	0.6	#DIV/0!	#DIV/0!	102.1	3.8	7	0.20	0.20	#DIV/0!	#DIV/0!	102.3	2.0
3.5	1	0.4	0.4	#DIV/0!	#DIV/0!	99.4	1.1	1	0.15	0.15	#DIV/0!	#DIV/0!	101.0	4.2
7.0	2	0.4	0.4	#DIV/0!	#DIV/0!	101.4	6.2	2	0.15	0.15	#DIV/0!	#DIV/0!	101.8	5.0
10.5	3	0.4	0.4	#DIV/0!	#DIV/0!	102.2	2.0	3	0.10	0.10	#DIV/0!	#DIV/0!	101.7	1.2
14.0	4	0.3	0.3	#DIV/0!	#DIV/0!	102.3	4.4	4	0.10	0.10	#DIV/0!	#DIV/0!	102.3	4.7
17.5	5	0.3	0.3	#DIV/0!	#DIV/0!	102.2	4.7	5	0.10	0.10	#DIV/0!	#DIV/0!	102.4	1.8
21.0	6	0.4	0.4	#DIV/0!	#DIV/0!	102.3	5.1	6	0.10	0.10	#DIV/0!	#DIV/0!	102.4	0.8
24.5	7	0.4	0.4	#DIV/0!	#DIV/0!	102.3	4.6	7	0.10	0.10	#DIV/0!	#DIV/0!	102.0	2.5
											Average Values:	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

* Pitot tube P-4-2 (S type) was leak checked @ 2" H_2O, max scale on the manometer
* Pitot tube std-1 (std.) was leak checked @ 2" H_2O, max scale on the manometer

ED_002408_00013961-00110

EPA-HQ-2019-004008

WB2 Run#1 9/20/18

Inj #	ΔP (inlet/outlet)	Temp (inlet/outlet)
1	.38 / .32	100 / 100
2	.38 / .32	101 / 101
3	.38 / .32	102 / 102
4	.38 / .32	101 / 101
5	.38 / .32	101 / 101
6	.38 / .32	102 / 102
7	.38 / .32	102 / 102
8	.38 / .32	102 / 102
9	.38 / .32	102 / 102
10	.38 / .32	103 / 103
11	.38 / .32	102 / 102
12	.38 / .32	103 / 103
13		
14		
15		

WB2 Run #2 9/20/18

Inj	ΔP In/out	Temp In/out
1	.38/.32	102/102
2	.38/.32	103/103
3	.38/.32	104/104
4	.38/.32	103/103
5	.38/.32	103/103
6	.38/.32	103/103
7	.38/.32	103/103
8	.38/.32	104/104
9	.38/.32	103/103
10	.38/.32	103/103
11	.38/.32	103/103
12	.38/.32	103/103
13	.38/.32	103/103
14		
15		

WB2 Run#3 9/20/18

Inj	ΔP In/out	Temp In/out
1	.38/.32	104/104
2	.38/.32	104/104
3	.38/.32	104/104
4	.38/.32	104/104
5	.38/.32	104/104
6	.38/.32	104/104
7	.38/.32	104/104
8	.38/.32	105/105
9	.38/.32	104/104
10	.38/.32	104/104
11	.38/.32	104/104
12	.38/.32	104/104
13		
14		
15		

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Elev 620ft 41.79 °N, 87.75 °W

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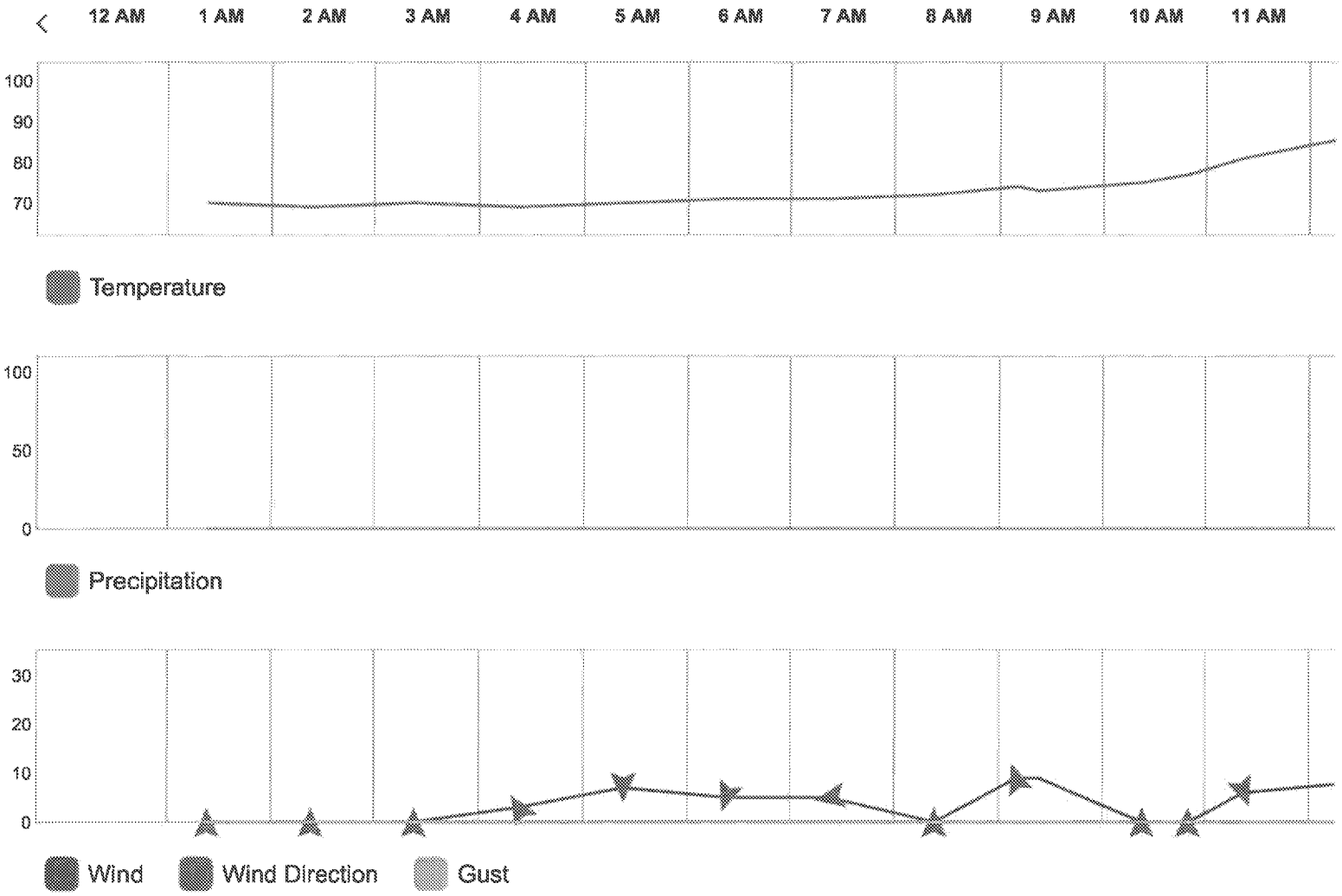
58° CHICAGO-MIDWAY STATION (/HISTORY/DAILY/US/IL/CHICAGO-MIDWAY/KMDW/DATE/2018-10-16?CM_VEN=LOCALWX_PWSDASH) | CHANGE

HISTORY (/HISTORY/DAILY/US/IL/CHICAGO-MIDWAY/KMDW/DATE/2018-10-16)

- TODAY (/WEATHER/US/IL/CHICAGO/KMDW)
- HOURLY (/HOURLY/US/IL/CHICAGO/KMDW)
- 10-DAY (/FORECAST/US/IL/CHICAGO/KMDW)
- CALENDAR (/CALENDAR/US/IL/CHICAGO-MIDWAY/KMDW/DATE/2018-10)
- HISTORY (/HISTORY/DAILY/US/IL/CHICAGO-MIDWAY/KMDW/DATE/2018-10-16)
- WUNDERMAP (/WUNDERMAP?LAT=41.78583145&LON=-87.75222015)

Daily Weekly Monthly

September 20 2018 View



Summary

Temperature (° F)	Actual	Historic Avg.	Record
High Temp	95	74	95
Low Temp	68	56	38
Day Average Temp	82	65	-

Precipitation (Inches)	Actual	Historic Avg.	Record
Precipitation	0	0.12	1.12
Month to Date	1.48	2.26	-
Year to Date	27.28	28.81	-

Degree Days (° F)	Actual	Historic Avg.	Record

Temperature (° F)	Actual	Historic Avg.	Record
Heating Degree Days	0	3	-
HDD Month to Date	0	32	-
HDD Since July 1	0	37	-
Cooling Degree Days	17	3	-
CDD Month to Date	190	100	-
CDD Year to Date	1355	1010	-
Growing Degree Days	32	-	-

Dew Point (° F)	Actual	Historic Avg.	Record
Dew Point	68	-	-
High	72	-	-
Low	65	-	-
Average	68	-	-

Wind (MPH)	Actual	Historic Avg.	Record
Max Wind Speed	22	-	-
Visibility	10	-	-

Sea Level Pressure (Hg)	Actual	Historic Avg.	Record
Sea Level Pressure	29.98	-	-

Astronomy	Day Length	Rise	Set
Actual Time	12h 16m	6:37 AM	6:53 PM
Civil Twilight		6:09 AM	7:21 PM
Nautical Twilight		5:37 AM	7:54 PM
Astronomical Twilight		5:03 AM	8:27 PM
Moon: waxing gibbous		4:54 PM	2:04 AM

Daily Observations

Time	Temperature	Dew Point	Humidity	Wind	Wind Speed	Wind Gust	Pressure	Precip.	Precip Accum
12:53 AM	70 ° F	66 ° F	87 %	CALM	0 mph	0 mph	29.3 in	0.0 in	0.0 in
1:53 AM	69 ° F	65 ° F	87 %	CALM	0 mph	0 mph	29.3 in	0.0 in	0.0 in
2:53 AM	70 ° F	66 ° F	87 %	CALM	0 mph	0 mph	29.3 in	0.0 in	0.0 in
3:53 AM	69 ° F	66 ° F	90 %	NNW	3 mph	0 mph	29.3 in	0.0 in	0.0 in
4:53 AM	70 ° F	66 ° F	87 %	S	7 mph	0 mph	29.3 in	0.0 in	0.0 in
5:53 AM	71 ° F	66 ° F	84 %	SSW	5 mph	0 mph	29.3 in	0.0 in	0.0 in
6:53 AM	71 ° F	67 ° F	87 %	W	5 mph	0 mph	29.3 in	0.0 in	0.0 in
7:53 AM	72 ° F	67 ° F	84 %	CALM	0 mph	0 mph	29.3 in	0.0 in	0.0 in
8:40 AM	74 ° F	68 ° F	82 %	NNW	9 mph	0 mph	29.3 in	0.0 in	0.0 in
8:53 AM	73 ° F	67 ° F	81 %	NNW	9 mph	0 mph	29.3 in	0.0 in	0.0 in
9:53 AM	75 ° F	68 ° F	79 %	CALM	0 mph	0 mph	29.3 in	0.0 in	0.0 in
10:20 AM	77 ° F	69 ° F	76 %	CALM	0 mph	0 mph	29.3 in	0.0 in	0.0 in
10:53 AM	81 ° F	70 ° F	69 %	SSE	6 mph	0 mph	29.3 in	0.0 in	0.0 in
11:53 AM	86 ° F	72 ° F	63 %	SSW	8 mph	0 mph	29.3 in	0.0 in	0.0 in
12:53 PM	89 ° F	72 ° F	57 %	SSW	12 mph	20 mph	29.3 in	0.0 in	0.0 in
1:53 PM	92 ° F	71 ° F	50 %	SW	12 mph	20 mph	29.2 in	0.0 in	0.0 in
2:53 PM	95 ° F	70 ° F	44 %	SSW	15 mph	24 mph	29.2 in	0.0 in	0.0 in
3:53 PM	94 ° F	69 ° F	44 %	SSW	18 mph	29 mph	29.2 in	0.0 in	0.0 in
4:53 PM	94 ° F	67 ° F	41 %	SW	16 mph	30 mph	29.2 in	0.0 in	0.0 in
5:53 PM	93 ° F	67 ° F	42 %	SSW	16 mph	25 mph	29.1 in	0.0 in	0.0 in
6:53 PM	92 ° F	66 ° F	42 %	SSW	13 mph	24 mph	29.1 in	0.0 in	0.0 in
7:53 PM	90 ° F	66 ° F	45 %	SSW	17 mph	28 mph	29.1 in	0.0 in	0.0 in
8:53 PM	88 ° F	67 ° F	49 %	S	15 mph	26 mph	29.1 in	0.0 in	0.0 in
9:53 PM	87 ° F	66 ° F	49 %	SSW	18 mph	30 mph	29.1 in	0.0 in	0.0 in
10:53 PM	85 ° F	67 ° F	55 %	SSW	20 mph	32 mph	29.2 in	0.0 in	0.0 in
11:53 PM	83 ° F	66 ° F	56 %	SSW	17 mph	30 mph	29.2 in	0.0 in	0.0 in

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APPENDIX G

Testing Equipment Information

CleanAir.

CleanAir Instrument Rental
500 W. Wood Street
Palatine, IL 60067-4975
800-553-5511
www.cleanair.com

Pitot Tube Calibration

Probe Type: S-Type Pitot

I.D. Number: P-6-4

Project Number:

Thermocouple Calibration

Reference Type: Thermometer Reference I.D. No: 1641582Rg Pyrometer I.D. No: 80512890 Units: °F

Point No.	Target Temp.	Reference Temp.	Indicated Temp.	Temp. Difference	% Difference*	Within spec?
1	Ambient					
2	200°F-250°F					

* Based on Absolute Temperature (Rankine) %Difference ≤ 1.5

Geometric Pitot Calibration

Is pitot assembly in good repair? ◉ Yes ◯ No If no, explain:

"S" Pitot

Dimensions		Dimensions		Specifications	Within Spec?
α1=	1.0	α2=	0.0	<=10 °	YES
β1=	2.0	β2=	2.0	<=5°	YES
γ=	0.0	θ=	0.0	None	N/A
A=	0.718			None	N/A
Dt=	0.250			0.1875"<=Dt<=0.375"	YES

	Calculations	Specifications	Within Spec?
A/2=Pa=Pb=	0.359 inches	None	N/A
Pa/Dt=Pb/Dt=	1.436 inches	1.05<P/Dt<1.5	YES
z = A sin γ =	0.000 inches	<=0.125"	YES
w = A sin θ =	0.000 inches	<=0.03125"	YES

Pitot Cp= 0.84 according to 40 CFR 60 section 10.1

Standard Pitot

	Measurement	Specification	Calculation	Within Spec?
Tube O.D.		None		
Static Hole I.D.		within 10% of (0.1*O.D.)		
Tip to Static		>=6*O.D.		
Static to Bend		>=8*O.D.		

Pitot Cp=

Calibrated by: Wayne Berry Date: 4/26/2018

CleanAir

CleanAir Instrument Rental
500 W. Wood Street
Palatine, IL 60067-4975
800-553-5511
www.cleanair.com

Pitot Tube Calibration

Probe Type: S-Type Pitot

I.D. Number: P-4-2

Project Number:

A Thermocouple Calibration

Reference Type: Thermometer Reference I.D. No: 1641582Rg Pyrometer I.D. No: 80512890 Units: °F

Point No.	Target Temp.	Reference Temp.	Indicated Temp.	Temp. Difference	% Difference*	Within spec?
1	Ambient					
2	200°F-250°F					

* Based on Absolute Temperature (Rankine) %Difference ≤ 1.5

Geometric Pitot Calibration

Is pitot assembly in good repair? ◉ Yes ○ No If no, explain:

"S" Pitot

Dimensions		Dimensions		Specifications	Within Spec?
α1=	1.0	α2=	1.0	<=10 °	YES
β1=	-1.0	β2=	2.0	<=5°	YES
γ=	3.0	θ=	0.0	None	N/A
A=	0.731			None	N/A
Dt=	0.250			0.1875"<=Dt<=0.375"	YES

Calculations		Specifications	Within Spec?
A/2=Pa=Pb=	0.366 inches	None	N/A
Pa/Dt=Pb/Dt=	1.462 inches	1.05<P/Dt<1.5	YES
z = A sin γ =	0.038 inches	<=0.125"	YES
w = A sin θ =	0.000 inches	<=0.03125"	YES

Pitot Cp= 0.84 according to 40 CFR 60 section 10.1

Standard Pitot

	Measurement	Specification	Calculation	Within Spec?
Tube O.D.	1.000 inches	None		N/A
Static Hole I.D.		within 10% of (0.1*O.D.)		
Tip to Static		>=6*O.D.		
Static to Bend		>=8*O.D.		

Pitot Cp=

Calibrated by: Wayne Berry Date: 9/19/2018

FLIR Commercial Systems, Inc.
9 Townsend West
Nashua, NH 03063 USA
Telephone: 603.324.7600
1-800-GOINFRA

Certificate of Compliance

We hereby certify that to the best of our knowledge, the instruments listed below meet or exceed the specifications stated in the appropriate instruction manuals. FLIR Commercial Systems, Inc., an ISO 9001:2008 certified company, inspects its incoming shipments using an approved sampling plan with an AQL. All incoming inspections are performed using test equipment that is traceable to National Standards.

CUSTOMER: ECSI, INC.
MODEL #: EA10
SERIAL#: 171103433

Dated this day: 04/03/2018

[redacted]

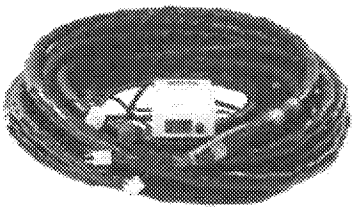
From: Bill Graham <bgraham@cleanair.com>
Sent: Wednesday, September 19, 2018 9:52 AM
To: [redacted]
Subject: RE: Reference P-50998

[redacted]
here is a cut sheet for heated lines directly from our Express Sales website. Sterigenics currently has one 0723-100 and one 0723-100HD.
the tubing is the same in both of them.

Regards,

Bill Graham Palatine Rental Team Leader
CleanAir Instrument Rental
500 W. Wood St. | Palatine, IL 60067
O: +1-800-553-5511 | rental.cleanair.com

HEATED SAMPLE LINES



These heated sample lines feature an electrically heat traced and insulated 3/8" Teflon ® PTFE (.030 Wall) sample line with a stainless steel over braid and stainless steel tube ends, a 1/4 Teflon ® PTFE (.040); calibration line, 3 pin Amphenol power connector, and 2 type K thermocouple plugs. Protected by a durable scuff resistant extruded polyurethane jacket. *Temperature controller sold separately. *These Heated Sample Lines are not self limiting; a temperature controller is required.

HEATED SAMPLE LINES ARE USED WITH:

- OEM Cosco - 6036RNT
- OEM 3 Point Probe - 0723123
- Temperature Controllers

HEAVY DUTY VERSUS STANDARD HEATED SAMPLE LINE

- Note: Heavy Duty Heated Sample Lines HD are manufactured to have a continuous operating temperature of 400°F (~204°C) at an ambient temperature of -20°F.
- Note: Standard Heated Sample Lines are manufactured to have a continuous operating temperature of 400°F (~204°C) at an ambient temperature of 0°F.

HEATED SAMPLE LINE FEATURES:

- Rated for 400 ° F continuous operation at -20 ° F ambient temperature
- Triple insulation maintains temperature of line with less power consumption. (Heavy Duty)
- Lower resistance heaters requires less power to heat lines.
- A backup type K thermocouple to prevent project delays in the case of primary thermocouple failure in the field.
- Stainless steel over braid and stainless steel tube ends for the sample line to prevent abrasive failure in the field. Optional stainless steel over braid for protection of calibration line from abrasive failure in the field.
- Durable extruded poly-urethane jacket for protection of sample/calibration lines from abrasive failure in the field.
- Inert teflon ® PTFE sample and calibration lines will provide more accurate results by eliminating potential bias from other materials. Teflon is also more corrosion resistant than tygon, and can be washed with acetone without degradation.

Part Number	Voltage	Watts	Length Ft.	Amp.
0723-10	120	300	10' Heated Sample Line	2.73
0723-25	120	750	25' Heated Sample Line	6.82
0723-50	120	1500	50' Heated Sample Line	13.64
0723-100	120	2500	100' Heated Sample Line	22.73
*0723-100HD	120	3000	100' Heavy Duty Heated Sample Line	27
0723-100220	120/240	N/A	100' Dual Voltage Heated Sample Line	N/A
0725RENT	Universal Temperature Controller			

Custom lengths, voltage, and configuration available*Heavy Duty Heated Sample Lines are manufactured to have a continuous operating temperature of 400°F (~204°C) at -20°F ambient temperature.These Heated Sample Lines may be rented through CleanAir Rental

APPENDIX H

Sample Line Residence Time

Sample Line Volume Calculation

Data: 100 ft of 3/8" Teflon line with wall thickness of .030"

Interior Volume Radius: (outside diameter/2) – (wall thickness) = (.375"/2) - .030" = 0.1575"

0.1575" * 1 ft/12 inches = 0.013125 feet

Cylindrical Volume = pi * r^2 * length = 3.1459 * $(0.013125)^2$ * 1 foot line length = 0.00054193 cubic feet per foot of line

0.00054193 cubic feet * 28316.8 cc / 1 cubic foot = 15.3457 cc per foot of line

For 100 foot of line, the total interior volume is 1535 cc.

Sample Residence Time Calculation

Sample Residence Time = Volume of sample lines / Sample pump flow rate

= 1535 cc / 500-1000 cc per minute = 1.54 - 3.07 minutes

WB Sample Port Locations	Duct Size/Configuration	Length (Diameter)	Width	Diameter (Eq. Diameter)		Distance from/to Disturbance	Diameters from/to Disturbance	2D or greater downstream?	0.5D or greater upstream?
WB I Inlet	36" round	36		36	Downstream	78	2.2	YES	
				36	Upstream	44	1.2		YES
WB I Outlet	30" x 20" rectangular	30	20	24	Downstream	60	2.5	YES	
				24	Upstream	84	3.5		YES
WB II Inlet	28" round	28		28	Downstream	108	3.9	YES	
				28	Upstream	96	3.4		YES
WB II Outlet	28" square	28	28	28	Downstream	56	2.0	YES	
				28	Upstream	170	6.1		YES

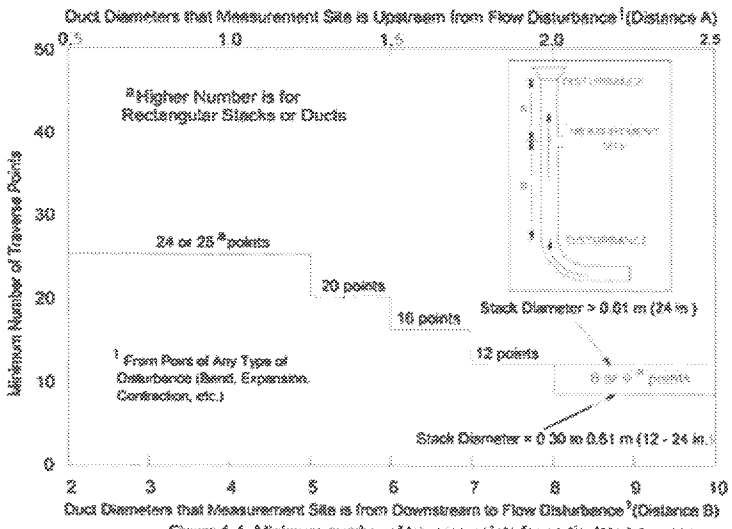


Figure 1-1. Minimum number of traverse points for particulate traverses

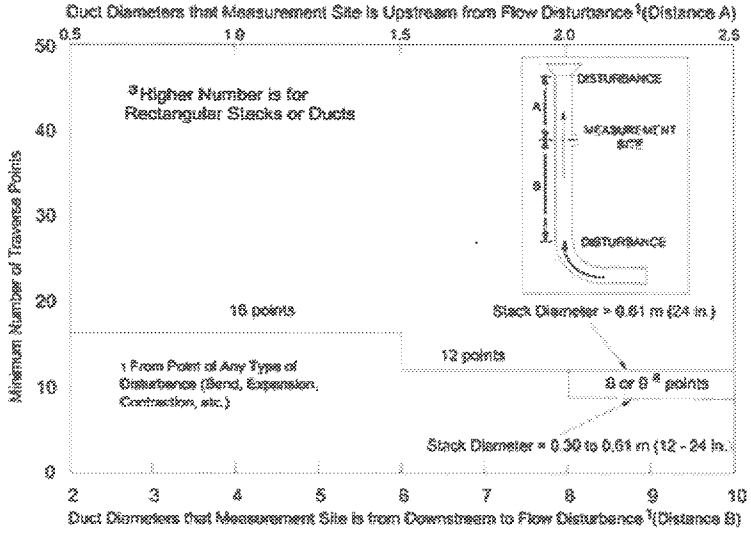


Figure 1-2. Minimum number of traverse points for velocity (nonparticulate) traverses

$$D_e = \frac{2(L)(W)}{L + W}$$

* * * * *

EPA-HQ-2019-004008

ED_002408_00013961-00127

APPENDIX I

Calibration Data

ETHYLENE OXIDE SOURCE TEST/CALIBRATION DATA

Client: Sterigenics - Willowbrook 2

Source Tested: AAT Safe Cell System Date: 9/20/18

PRE CALIBRATION

Inlet (FID)	Calibration Gas Conc. (ppmv)	1.10 ppm EtO	10.1 ppm EtO	100 ppm EtO	1000 ppm EtO	10080 ppm EtO			
	Area Counts #1	.431	4.00	39.3					
	Area Counts #2/3	.432	3.96	39.3					
	Average Area	.4333	3.980	39.33			Sample Line Bias Calibration		
	Audit Standard (48.8 ppmv) Result						102.2 ppm (Std @ 100 ppmv)		
Outlet (PID)	Calibration Gas Conc. (ppmv)	1.10 ppm EtO	10.1 ppm EtO	100 ppm EtO					
	Area Counts #1	2.77	25.1	249					
	Area Counts #2/3	2.76	25.7	249					
	Average Area	2.767	25.47	249.3			Sample Line Bias Calibration		
	Audit Standard (48.8 ppmv) Result						101.5 ppm (Std @ 100 ppmv)		

	Run #1	Run #2	Run #3				
BV Start:	1538	1616	1650	P_{bar}:	29.15	EtO Usage (lbs/yr):	
BV Stop:	1553	1631	1705	$\%H_2O$:		Cycles Per Week:	

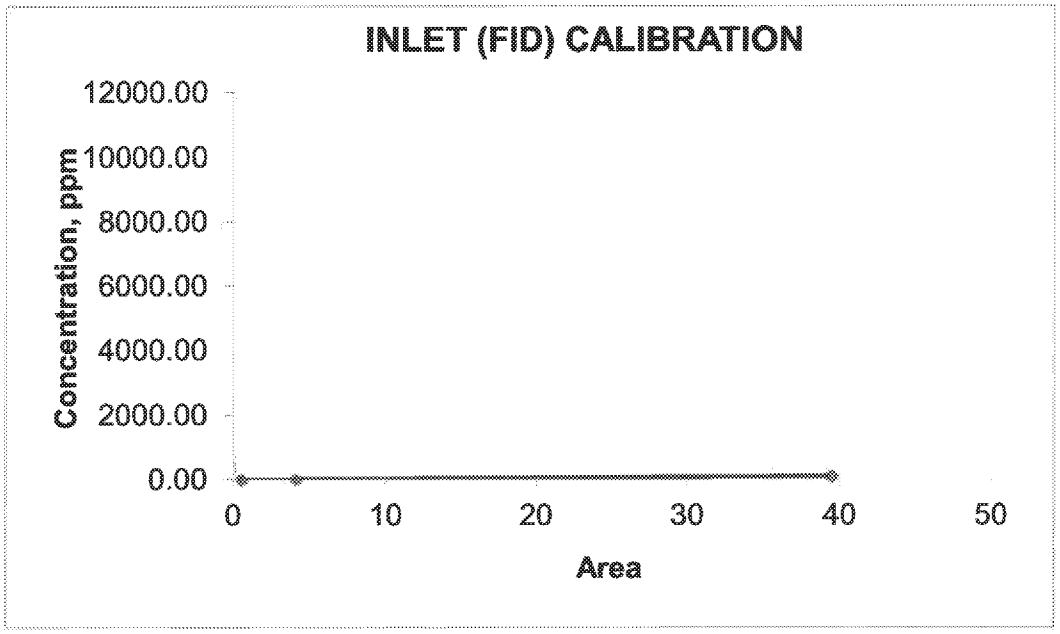
MID/POST CALIBRATION

Inlet (FID)	Calibration Gas Conc. (ppmv)	1.10 ppm EtO	10.1 ppm EtO	100 ppm EtO	1000 ppm EtO	10080 ppm EtO			
	~~Mid Cal~~	Post Cal Sample Line Bias							
	Post Cal			39.7 = 100.9 ppm					
	Audit Standard (48.8 ppmv) Result								
Outlet (PID)	Calibration Gas Conc. (ppmv)	1.10 ppm EtO	10.1 ppm EtO	100 ppm EtO					
	~~Mid Cal~~	Post Cal Sample Line Bias							
	Post Cal		25.6 = 10.20 ppm						
	Audit Standard (48.8 ppmv) Result								

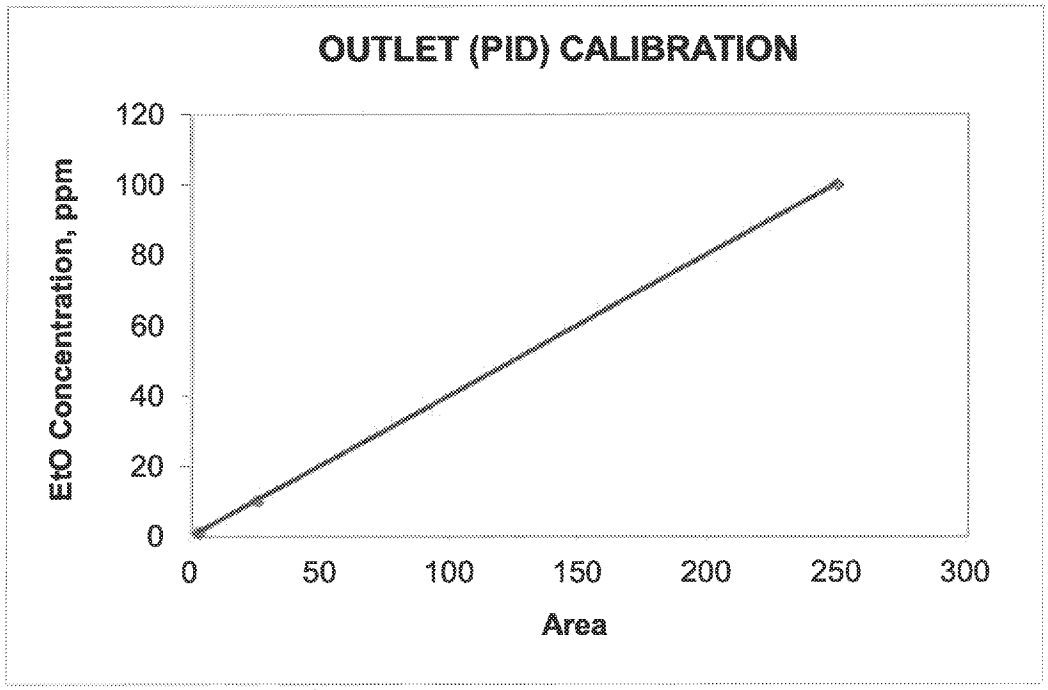
ECSi

EtO Calibrations

Site: Sterigenics - Willowbrook 2
Date: 9/20/2018

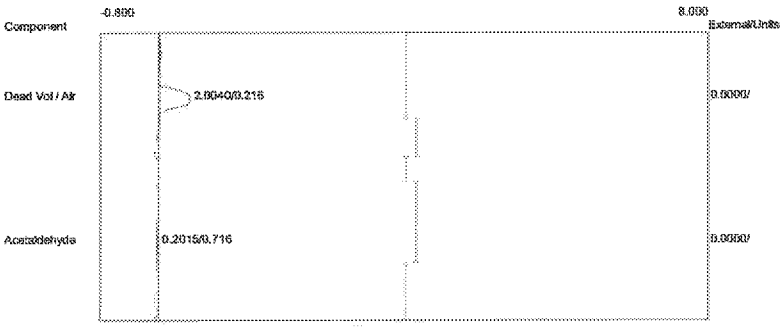


Slope 2.54
Intercept -0.01



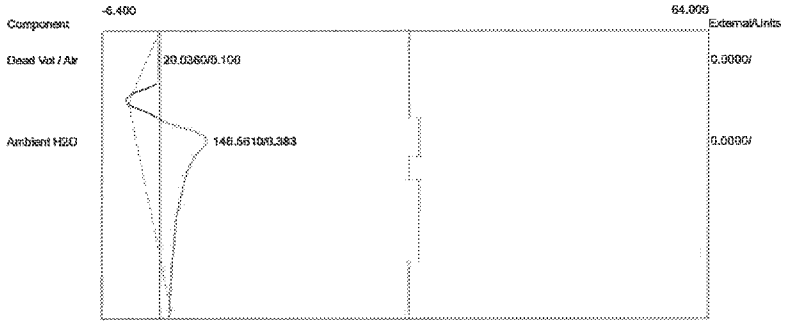
Slope 0.401
Intercept -0.0399

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 09:34:38
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-Amb.CHR (c:\peak359)
Sample: Ambient Background
Operator: D. Kremer



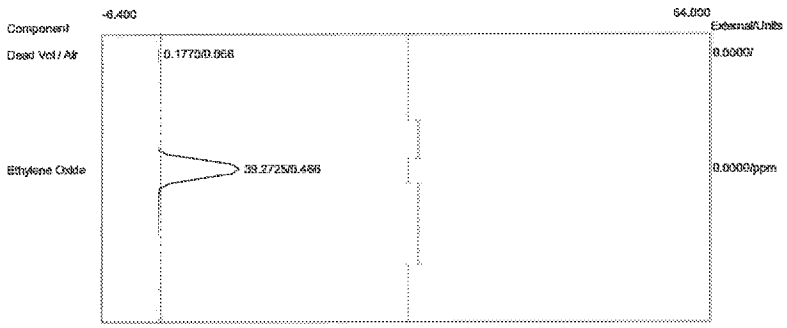
Component	Retention	Area	External	Units
Dead Vol / Air	0.216	2.0040	0.0000	
Acetaldehyde	0.716	0.2015	0.0000	
		2.2055	0.0000	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 09:34:38
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-Amb.CHR (c:\peak359)
Sample: Ambient Background
Operator: D. Kremer



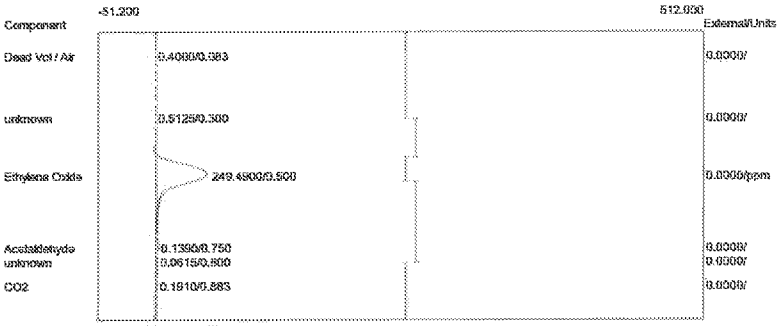
Component	Retention	Area	External	Units
Dead Vol / Air	0.100	20.0360	0.0000	
Ambient H2O	0.383	146.5610	0.0000	
		166.5970	0.0000	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 09:50:51
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-C01.CHR (c:\peak359)
Sample: 100 ppm std
Operator: D. Kremer



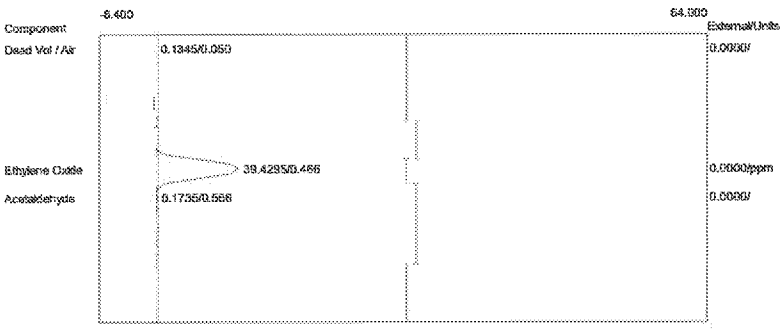
Component	Retention	Area	External	Units
Dead Vol / Air	0.066	0.1770	0.0000	
Ethylene Oxide	0.466	39.2725	0.0000	ppm
		39.4495	0.0000	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 09:50:51
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-C01.CHR (c:\peak359)
Sample: 100 ppm std
Operator: D. Kremer



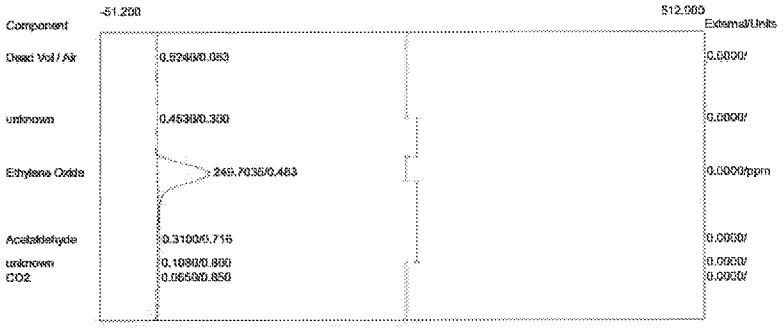
Component	Retention	Area	External	Units
Dead Vol / Air	0.083	0.4000	0.0000	
Ethylene Oxide	0.500	249.4900	0.0000	ppm
Acetaldehyde	0.750	0.1390	0.0000	
CO2	0.883	0.1910	0.0000	
		250.2200	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 09:54:38
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-C02.CHR (c:\peak359)
Sample: 100 ppm std
Operator: D. Kremer



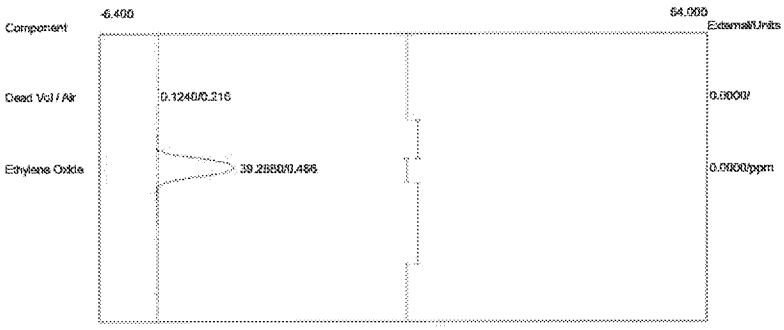
Component	Retention	Area	External	Units
Dead Vol / Air	0.050	0.1345	0.0000	
Ethylene Oxide	0.466	39.4295	0.0000	ppm
Acetaldehyde	0.566	0.1735	0.0000	
		39.7375	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 09:54:38
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-C02.CHR (c:\peak359)
Sample: 100 ppm std
Operator: D. Kremer



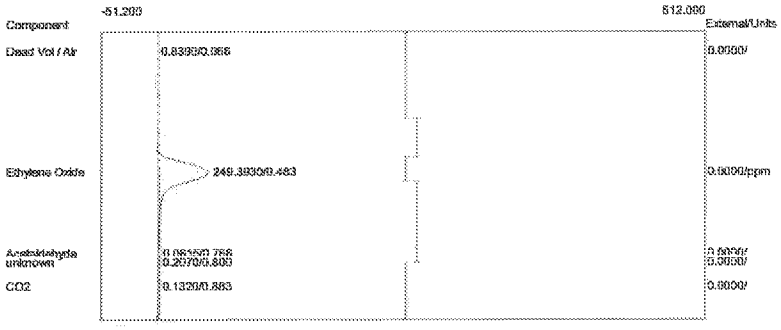
Component	Retention	Area	External	Units
Dead Vol / Air	0.083	0.5240	0.0000	
Ethylene Oxide	0.483	249.7035	0.0000	ppm
Acetaldehyde	0.716	0.3100	0.0000	
CO2	0.850	0.0650	0.0000	
		250.6025	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 09:58:20
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-C03.CHR (c:\peak359)
Sample: 100 ppm std
Operator: D. Kremer



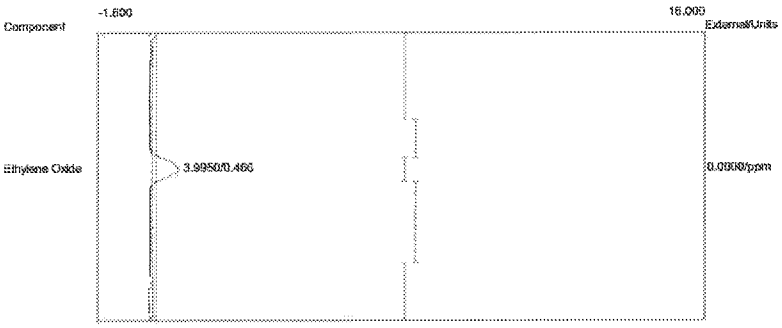
Component	Retention	Area	External	Units
Dead Vol / Air	0.216	0.1240	0.0000	
Ethylene Oxide	0.466	39.2880	0.0000	ppm
		39.4120	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 09:58:20
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-C03.CHR (c:\peak359)
Sample: 100 ppm std
Operator: D. Kremer



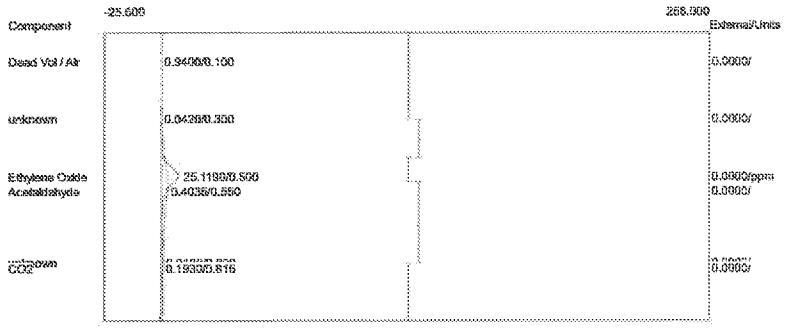
Component	Retention	Area	External	Units
Dead Vol / Air	0.066	0.8390	0.0000	
Ethylene Oxide	0.483	249.3930	0.0000	ppm
Acetaldehyde	0.766	0.0615	0.0000	
CO2	0.883	0.1320	0.0000	
		250.4255	0.0000	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 10:14:50
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-C04.CHR (c:\peak359)
Sample: 10.1 ppm std
Operator: D. Kremer



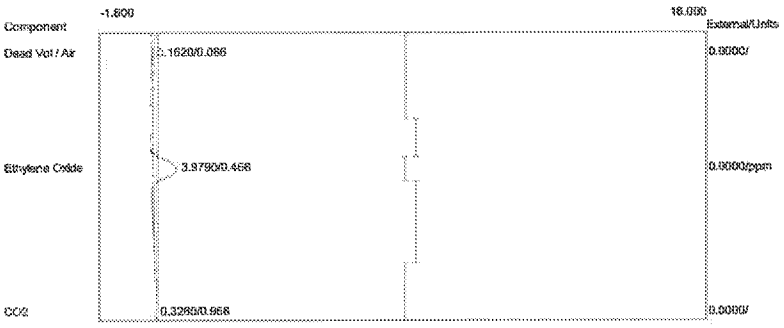
Component	Retention	Area	External	Units
Ethylene Oxide	0.466	3.9950	0.0000	ppm
		3.9950	0.0000	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 10:14:50
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-C04.CHR (c:\peak359)
Sample: 10.1 ppm std
Operator: D. Kremer



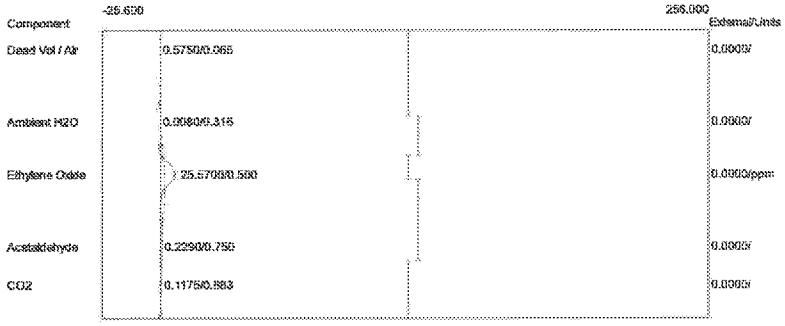
Component	Retention	Area	External	Units
Dead Vol / Air	0.100	0.9400	0.0000	
Ethylene Oxide	0.500	25.1190	0.0000	ppm
Acetaldehyde	0.550	0.4035	0.0000	
CO2	0.816	0.1930	0.0000	
		26.6555	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 10:19:14
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-C05.CHR (c:\peak359)
Sample: 10.1 ppm std
Operator: D. Kremer



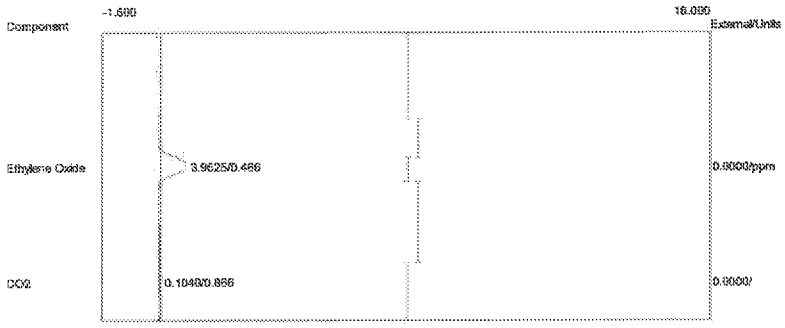
Component	Retention	Area	External	Units
Dead Vol / Air	0.066	0.1620	0.0000	
Ethylene Oxide	0.466	3.9790	0.0000	ppm
CO2	0.966	0.3260	0.0000	
		4.4670	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 10:19:14
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-C05.CHR (c:\peak359)
Sample: 10.1 ppm std
Operator: D. Kremer



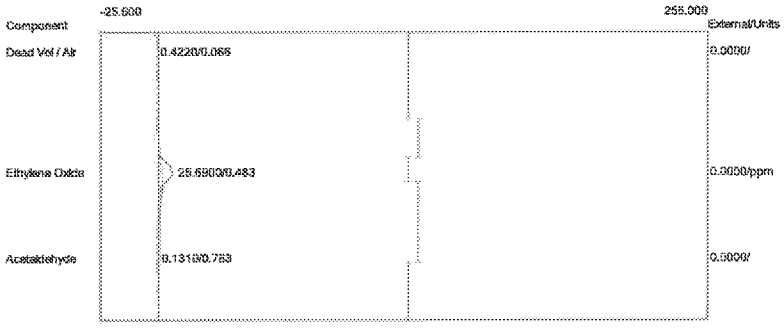
Component	Retention	Area	External	Units
Dead Vol / Air	0.066	0.5750	0.0000	
Ambient H2O	0.316	0.0080	0.0000	
Ethylene Oxide	0.500	25.5700	0.0000	ppm
Acetaldehyde	0.750	0.2290	0.0000	
CO2	0.883	0.1175	0.0000	
		26.4995	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 10:23:22
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-C06.CHR (c:\peak359)
Sample: 10.1 ppm std
Operator: D. Kremer



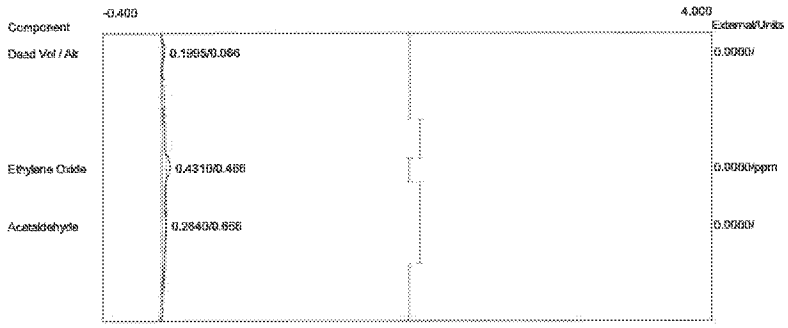
Component	Retention	Area	External	Units
Ethylene Oxide	0.466	3.9625	0.0000	ppm
CO2	0.866	0.1040	0.0000	
		4.0665	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 10:23:22
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-C06.CHR (c:\peak359)
Sample: 10.1 ppm std
Operator: D. Kremer



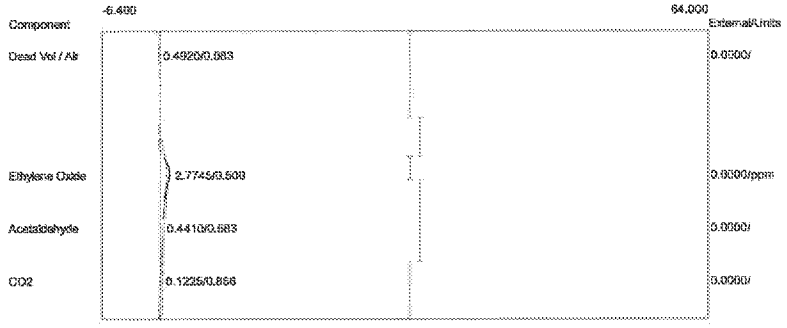
Component	Retention	Area	External	Units
Dead Vol / Air	0.066	0.4220	0.0000	
Ethylene Oxide	0.483	25.6900	0.0000	ppm
Acetaldehyde	0.783	0.1310	0.0000	
		26.2430	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 10:30:30
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-C07.CHR (c:\peak359)
Sample: 1.10 ppm std
Operator: D. Kremer



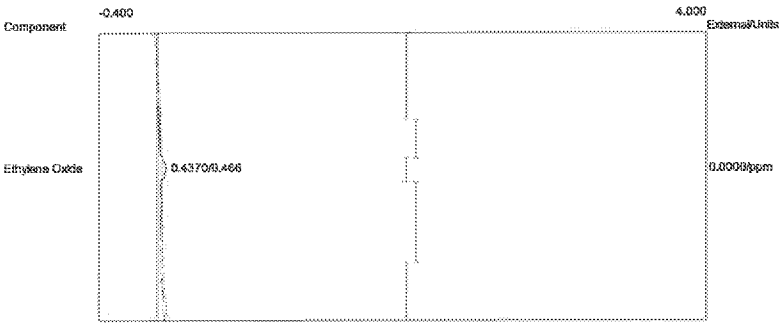
Component	Retention	Area	External	Units
Dead Vol / Air	0.066	0.1995	0.0000	
Ethylene Oxide	0.466	0.4310	0.0000	ppm
Acetaldehyde	0.666	0.2640	0.0000	
		0.8945	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 10:30:30
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-C07.CHR (c:\peak359)
Sample: 1.10 ppm std
Operator: D. Kremer



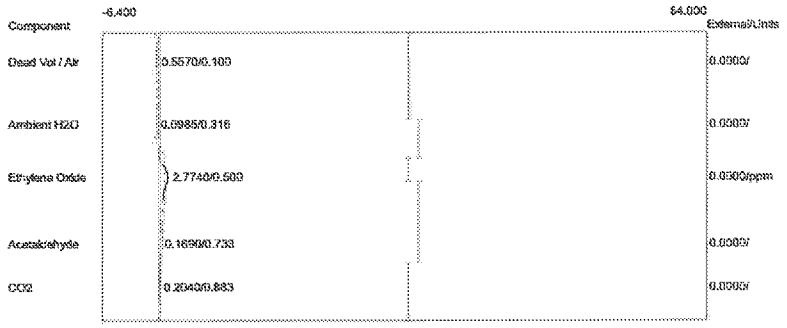
Component	Retention	Area	External	Units
Dead Vol / Air	0.083	0.4920	0.0000	
Ethylene Oxide	0.500	2.7745	0.0000	ppm
Acetaldehyde	0.683	0.4410	0.0000	
CO2	0.866	0.1225	0.0000	
		3.8300	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 10:34:48
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-C08.CHR (c:\peak359)
Sample: 1.10 ppm std
Operator: D. Kremer



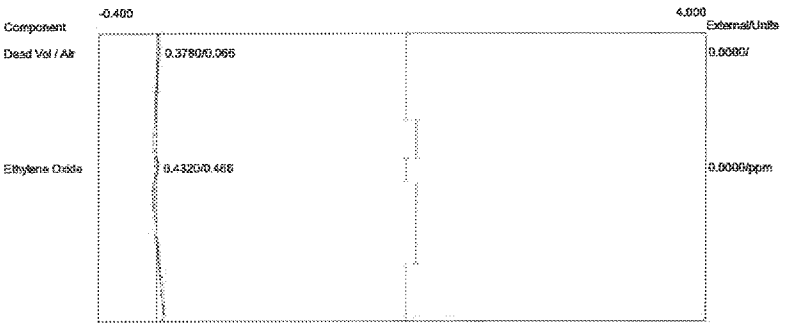
Component	Retention	Area	External	Units
Ethylene Oxide	0.466	0.4370	0.0000	ppm
		0.4370	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 10:34:48
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-C08.CHR (c:\peak359)
Sample: 1.10 ppm std
Operator: D. Kremer



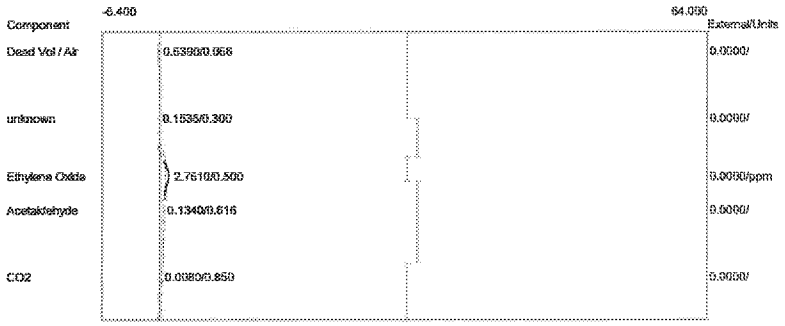
Component	Retention	Area	External	Units
Dead Vol / Air	0.100	0.5570	0.0000	
Ambient H2O	0.316	0.0985	0.0000	
Ethylene Oxide	0.500	2.7740	0.0000	ppm
Acetaldehyde	0.733	0.1690	0.0000	
CO2	0.883	0.2040	0.0000	
		3.8025	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 10:39:28
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-C09.CHR (c:\peak359)
Sample: 1.10 ppm std
Operator: D. Kremer



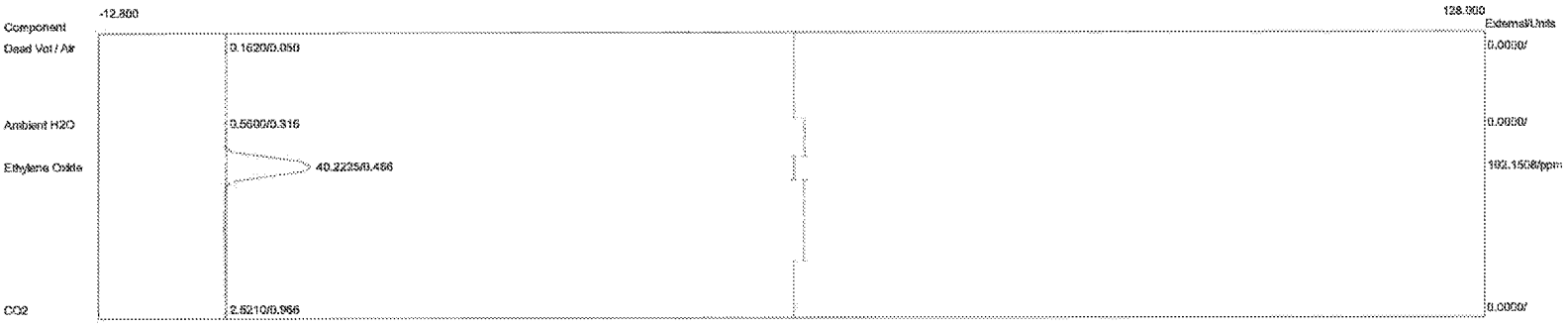
Component	Retention	Area	External	Units
Dead Vol / Air	0.066	0.3780	0.0000	
Ethylene Oxide	0.466	0.4320	0.0000	ppm
		0.8100	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 10:39:28
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-C09.CHR (c:\peak359)
Sample: 1.10 ppm std
Operator: D. Kremer



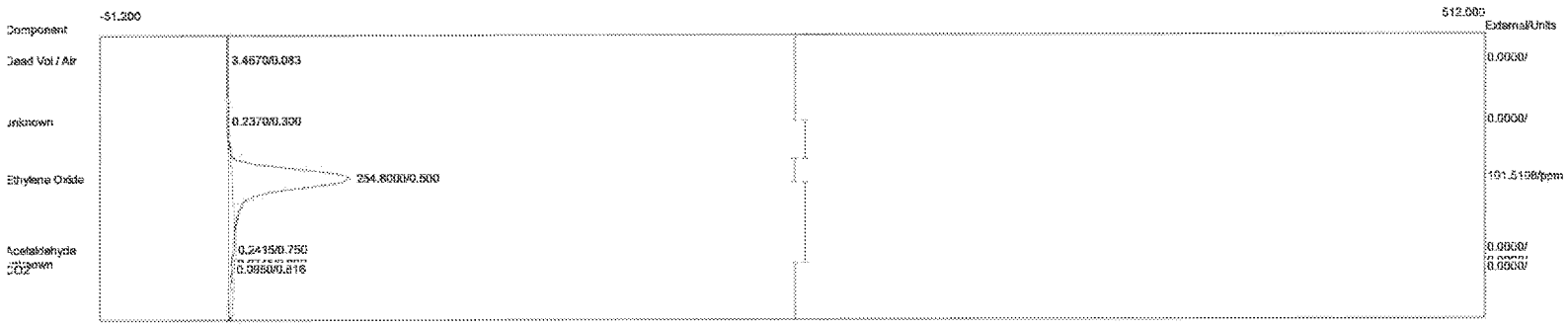
Component	Retention	Area	External	Units
Dead Vol / Air	0.066	0.6390	0.0000	
Ethylene Oxide	0.500	2.7610	0.0000	ppm
Acetaldehyde	0.616	0.1340	0.0000	
CO2	0.850	0.0080	0.0000	
		3.5420	0.0000	

Lab name: ECSi
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 14:15:26
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-C14.CHR (c:\peak359)
Sample: 100 ppm Sample Line Bias
Operator: D. Kremer



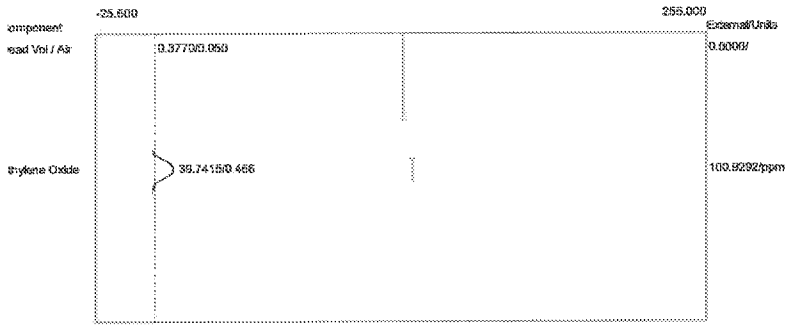
Component	Retention	Area	External	Units
Dead Vol / Air	0.050	0.1620	0.0000	
Ambient H2O	0.316	0.5600	0.0000	
Ethylene Oxide	0.466	40.2225	102.1508	ppm
CO2	0.966	2.5210	0.0000	
		43.4655	102.1508	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: PreCal
Analysis date: 09/20/2018 14:07:47
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-C11.CHR (c:\peak359)
Sample: 100 ppm Sample Line Bias
Operator: D. Kremer



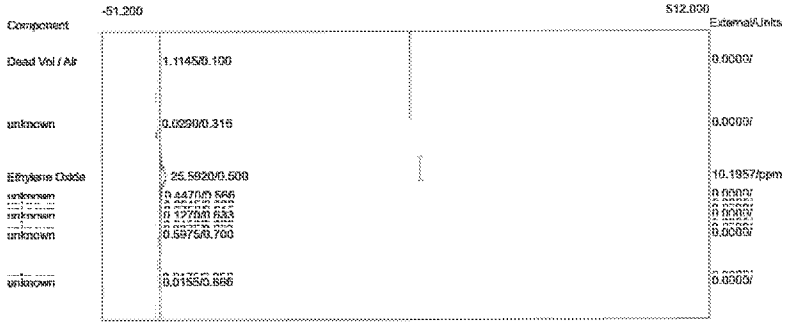
Component	Retention	Area	External	Units
Dead Vol / Air	0.083	3.4670	0.0000	
Ethylene Oxide	0.500	254.8000	101.5108	ppm
Acetaldehyde	0.750	0.2415	0.0000	
CO2	0.816	0.0980	0.0000	
		258.6065	101.5108	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: PostCal
Analysis date: 09/20/2018 17:55:27
Method: Direct Injection
Description: CHANNEL 1 - FID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto1-100.cpt
Data file: 1Ster2WB2018-C15.CHR (c:\peak359)
Sample: 100 ppm std sample line bias
Operator: D. Kremer



Component	Retention	Area	External	Units
Dead Vol / Air	0.050	0.3770	0.0000	
Ethylene Oxide	0.466	39.7415	100.9292	ppm
		40.1185	100.9292	

Lab name: ECSI
Client: Sterigenics - Willowbrook 2
Client ID: ~~Peak359~~ PostCal
Analysis date: 09/20/2018 18:09:26
Method: Direct Injection
Description: CHANNEL 2 - PID
Column: 1% SP-1000, Carbopack B
Carrier: HELIUM
Temp. prog: eto-100.tem
Components: eto2-100.cpt
Data file: 2Ster2WB2018-C12.CHR (c:\peak359)
Sample: ~~AAP Outlet~~ 10 ppm std sample line bias
Operator: D. Kremer



Component	Retention	Area	External	Units
Dead Vol / Air	0.100	1.1145	0.0000	
Ethylene Oxide	0.500	25.5920	10.1957	ppm
		26.7065	10.1957	

APPENDIX J

Gas Certifications

CERTIFIED WORKING CLASS

Single-Certified Calibration Standard

Scott Specialty Gases
00 CAJON BLVD., SAN BERNARDINO, CA 92411
Phone: 909-887-2571 Fax: 909-887-0549

CERTIFICATE OF ACCURACY: Certified Working Class Calibration Standard

Product Information
Project No.: 02-57164-001
Item No.: 02020001310TCL
P.O. No.: VBL – D. KREMER

Cylinder Number: CAL4448
Cylinder Size: CL
Certification Date: 20Apr2018

Customer

ECSI, INC
PO BOX 1498
SAN CLEMENTE, CA 92674

CERTIFIED CONCENTRATION

Component Name	Concentration (Moles)		Accuracy (+/-%)
ETHYLENE OXIDE	1.10	PPM	5
NITROGEN		BALANCE	

TRACEABILITY

Traceable To

Scott Reference Standard

APPROVED BY: MT

DATE: 4-20-18

SPECIFICATIONS

Component Name	Requested Concentration (Moles)		Certified Concentration (Moles)		Blend Tolerance Result (+/- %)	Certified Accuracy Result (+/- %)
ETHYLENE OXIDE	1.	PPM	1.10	PPM	10.0	5.00
NITROGEN		BAL		BAL		

TRACEABILITY

Traceable To
Scott Reference Standard

PHYSICAL PROPERTIES

Cylinder Size: CL

Pressure: 1200 PSIG
Expiration Date: 20Apr2020

SPECIAL HANDLING INSTRUCTIONS

Do not use or store cylinder at or below the stated dew point temperature. Possible condensation of heavier components could result. In the event the cylinder has been exposed to temperatures at or below the dew point, place cylinder in heated area for 24 hours and then roll cylinder for 15 minutes to re-mix.

Use of calibration standards at or below dew point temperature may result in calibration error.

COMMENTS

CERTIFIED WORKING CLASS

Single-Certified Calibration Standard

Scott Specialty Gases

00 CAJON BLVD., SAN BERNARDINO, CA 92411 Phone: 909-887-2571 Fax: 909-887-0549

CERTIFICATE OF ACCURACY: Certified Working Class Calibration Standard

Product Information
Project No.: 02-57164-003
Item No.: 02020001320TCL
P.O. No.: VBL – D. KREMER

Cylinder Number: CLM003232
Cylinder Size: CL
Certification Date: 20Apr2018

Customer

ECSI, INC
PO BOX 1498
SAN CLEMENTE, CA 92674

CERTIFIED CONCENTRATION

Component Name	Concentration (Moles)		Accuracy (+/-%)
ETHYLENE OXIDE	10.1	PPM	5
NITROGEN		BALANCE	

TRACEABILITY

Traceable To

Scott Reference Standard

APPROVED BY: MT
MT

DATE: 4-20-18

SPECIFICATIONS

Component Name	Requested Concentration (Moles)		Certified Concentration (Moles)		Blend Tolerance Result (+/- %)	Certified Accuracy Result (+/- %)
ETHYLENE OXIDE	10.	PPM	10.1	PPM	1.0	5.00
NITROGEN		BAL		BAL		

TRACEABILITY

Traceable To
Scott Reference Standard

PHYSICAL PROPERTIES

Cylinder Size: CL

Pressure: 1200 PSIG
Expiration Date: 20Apr2020

SPECIAL HANDLING INSTRUCTIONS

Do not use or store cylinder at or below the stated dew point temperature. Possible condensation of heavier components could result. In the event the cylinder has been exposed to temperatures at or below the dew point, place cylinder in heated area for 24 hours and then roll cylinder for 15 minutes to re-mix.

Use of calibration standards at or below dew point temperature may result in calibration error.

COMMENTS

CERTIFIED WORKING CLASS

Single-Certified Calibration Standard

Scott Specialty Gases

00 CAJON BLVD., SAN BERNARDINO, CA 92411 Phone: 909-887-2571 Fax: 909-887-0549

CERTIFICATE OF ACCURACY: Certified Working Class Calibration Standard

Product Information
Project No.: 02-57164-004
Item No.: 02020001330TCL
P.O. No.: VBL - D. KREMER

Cylinder Number: CLM011385
Cylinder Size: CL
Certification Date: 20Apr2018

Customer

ECSI, INC
PO BOX 1498
SAN CLEMENTE, CA 92674

CERTIFIED CONCENTRATION

Component Name	Concentration (Moles)		Accuracy (+/-%)
ETHYLENE OXIDE	100.	PPM	5
NITROGEN		BALANCE	

TRACEABILITY

Traceable To

Scott Reference Standard

APPROVED BY: B. McCully BLM DATE: 4-20-18

SPECIFICATIONS

Component Name	Requested Concentration (Moles)		Certified Concentration (Moles)		Blend Tolerance Result (+/- %)	Certified Accuracy Result (+/- %)
ETHYLENE OXIDE	100.	PPM	100.	PPM	.0	5.00
NITROGEN		BAL		BAL		

TRACEABILITY

Traceable To
Scott Reference Standard

PHYSICAL PROPERTIES

Cylinder Size: CL

Pressure: 1300 PSIG
Expiration Date: 20Apr2020

Valve Connection: CGA 350

SPECIAL HANDLING INSTRUCTIONS

Do not use or store cylinder at or below the stated dew point temperature. Possible condensation of heavier components could result. In the event the cylinder has been exposed to temperatures at or below the dew point, place cylinder in heated area for 24 hours and then roll cylinder for 15 minutes to re-mix.

Use of calibration standards at or below dew point temperature may result in calibration error.

COMMENTS

CERTIFIED WORKING CLASS

Single-Certified Calibration Standard

Scott Specialty Gases
00 CAJON BLVD., SAN BERNARDINO, CA 92411
Phone: 909-887-2571 Fax: 909-887-0549

CERTIFICATE OF ACCURACY: Certified Working Class Calibration Standard

Product Information
Project No.: 02-57164-005
Item No.: 02020001340TCL
P.O. No.: VBL – D. KREMER

Cylinder Number: CLM002810
Cylinder Size: CL
Certification Date: 20Apr2018

Customer

ECSI, INC
PO BOX 1498
SAN CLEMENTE, CA 92674

CERTIFIED CONCENTRATION

Component Name	Concentration (Moles)		Accuracy (+/-%)
ETHYLENE OXIDE	1,000.	PPM	5
NITROGEN		BALANCE	

TRACEABILITY

Traceable To

Scott Reference Standard

APPROVED BY: BLM

DATE: 4-20-18

SPECIFICATIONS

Component Name	Requested Concentration (Moles)		Certified Concentration (Moles)		Blend Tolerance Result (+/- %)	Certified Accuracy Result (+/- %)
ETHYLENE OXIDE	1,000.	PPM	1,000.	PPM	.0	5.00
NITROGEN		BAL		BAL		

TRACEABILITY

Traceable To
Scott Reference Standard

PHYSICAL PROPERTIES

Cylinder Size: CL

Pressure: 1200 PSIG
Expiration Date: 20Apr2020

Valve Connection: CGA 350

SPECIAL HANDLING INSTRUCTIONS

Do not use or store cylinder at or below the stated dew point temperature. Possible condensation of heavier components could result. In the event the cylinder has been exposed to temperatures at or below the dew point, place cylinder in heated area for 24 hours and then roll cylinder for 15 minutes to re-mix.

Use of calibration standards at or below dew point temperature may result in calibration error.

COMMENTS

CERTIFIED WORKING CLASS

Single-Certified Calibration Standard

Scott Specialty Gases
00 CAJON BLVD., SAN BERNARDINO, CA 92411
Phone: 909-887-2571 Fax: 909-887-0549

CERTIFICATE OF ACCURACY: Certified Working Class Calibration Standard

Product Information
Project No.: 02-57164-006
Item No.: 02020001340TCL
P.O. No.: VBL – D. KREMER

Cylinder Number: CLM005787
Cylinder Size: CL
Certification Date: 20Apr2018

Customer

ECSI, INC
PO BOX 1498
SAN CLEMENTE, CA 92674

CERTIFIED CONCENTRATION

Component Name	Concentration (Moles)		Accuracy (+/-%)
ETHYLENE OXIDE	10,080.	PPM	5
NITROGEN		BALANCE	

TRACEABILITY

Traceable To

Scott Reference Standard

APPROVED BY: B. McCully BLM

DATE: 4-20-18

SPECIFICATIONS

Component Name	Requested Concentration (Moles)		Certified Concentration (Moles)		Blend Tolerance Result (+/- %)	Certified Accuracy Result (+/- %)
ETHYLENE OXIDE	10,000.	PPM	10,080.	PPM	.8	5.00
NITROGEN		BAL		BAL		

TRACEABILITY

Traceable To
Scott Reference Standard

PHYSICAL PROPERTIES

Cylinder Size: CL

Pressure: 700 PSIG
Expiration Date: 20Apr2020

Valve Connection: CGA 350

SPECIAL HANDLING INSTRUCTIONS

Do not use or store cylinder at or below the stated dew point temperature. Possible condensation of heavier components could result. In the event the cylinder has been exposed to temperatures at or below the dew point, place cylinder in heated area for 24 hours and then roll cylinder for 15 minutes to re-mix.

Use of calibration standards at or below dew point temperature may result in calibration error.

COMMENTS

MESA

CERTIFICATE OF ANALYSIS

Customer Name:	ECSi, Inc.	**Cylinder Number:**	SA25925
Stock or Analyzer Tag Number:	N/A	**Product Class:**	Certified Standard
Customer Reference:	Verbal- Dan	**Cylinder - Contents[1]:**	28 CF @ 2000 PSI
MESA Reference:	104448	**Cylinder-CGA:**	A006-HP-BR/350
Date of Certification:	4/19/2018	**Analysis Method:**	GC-TCD/FID
Recommended Shelf Life:	2 Years	**Preparation Method:**	Gravimetric

Component	Requested Concentration[2]	Reported Concentration[2,3]
Ethylene Oxide	50 ppm	48.8 ppm
Nitrogen	Balance	Balance

Authorized Signature:

1. The fill pressure shown on the COA is as originally quoted. The fill pressure measured by the customer may differ from the fill pressure originally quoted due to temperature effects, compressibility of the individual components when blended together in the cylinder, gauge accuracy or reduction in content volume before shipping as a result of samples withdrawn for laboratory QC necessary to ensure product quality.
2. Unless otherwise stated, concentrations are given in molar units.
3. Vapor pressure mixes are blended at a sufficiently low pressure so as to eliminate phase separation under most low temperature conditions encountered during transport or storage. However, it is generally recommended that cylinders containing vapor pressure restricted mixes be placed on the floor in a horizontal position and rolled back and forth to improve homogeneity of the gas phase mixture before being put into service.

Analytical Gas Standards are prepared and analyzed using combinations of NIST traceable weights, SRM's provided by NIST, or internal gas standards that have been verified for accuracy using procedures published by the US-EPA. Pure gases are analyzed and certified for purity using minor component Analytical Gas Standards prepared according to the methods specified above. Balances are calibrated to NIST test weights covered by NIST test number 822/256175/96. Reference Certification #'s: 163/W, 830/N and 3280. Calibration methods are in conformance with MIL-STD 45662A.

MESA Specialty Gases & Equipment
division of MESA International Technologies, Inc.
3619 Pendleton Avenue, Suite C ♦ Santa Ana, California 92704 ♦USA
TEL: 714-434-7102 ♦ FAX: 714-434-8006 ♦ E-mail: mail@mesagas.com
On-line Catalog at www.mesagas.com

APPENDIX K

Limit of Detection

Detection Limit Study

Step 1 : Prepare and analyze at least seven standards prepared at or near the estimated detection limit

Step 2 : Record and calculate the standard deviation of the replicate measurements.

Analysis Number	1	2	3	4	5	6	7	8	9	10
Result	1.007	1.011	1.015	1.01	1.071	1.071	1.067			

Calculated Standard Deviation = 0.0316

Step 3 : Determine the Method Detection Limit (MDL) by mulitplying the student T value appropriate for 99% confidence level and the standard deviation estimate with in n-1 degrees of freedom

Number of Replicates	7	8	9	10
T-values	3.143	2.998	2.896	2.821

Method Detection Limit: = 0.10

Wagner, Kevin

From: Hoffman, Kathy
Sent: Tuesday, September 25, 2018 8:42 AM
To: Wagner, Kevin
Subject: FW: MDL calculations and additional information.
Attachments: Detection Limit Master Spreadsheet.xls

From: Shappley, Ned [mailto:Shappley.Ned@epa.gov]
Sent: Monday, September 24, 2018 12:02 PM
To: Hoffman, Kathy; dankremer@ecsi1.com
Cc: Sieffert, Margaret; Mattison, Kevin; Merrill, Raymond; Johnson, Steffan
Subject: MDL calculations and additional information.

Dan/Kathy,

As we discussed on site, attached is the spreadsheet (Note, this is not an official EPA spreadsheet) I used to determine the MDL (i.e., LOD) for the testing last week at Sterigenics. It is important to include all raw data associated with this study as well as a discussion of the procedures used. The reference for how MDL studies should be performed can be found in Section 15.2 of Method 301 (40 CFR Part 63), which links you to 40 CFR Part 136, Appendix B (see below). In this instance, I am making the recommendation to Illinois EPA to accept this MDL study with just spiked samples and collected over a shorter time period.

Based on the 7 replicate values I calculated using the low calibration response, in lieu of reporting a ND, you should report a <0.10 ppm for the measured concentration. It is important to use this MDL value when calculating the DRE. Going forward you should consider repeating the MDL for each test program or include a MDL verification step to ensure that your system is capable of measuring at these low-levels. For future MDL studies, it is strongly suggested you develop an MDL using a similar matrix (i.e., in air) as opposed to a calibration gas cylinder. I suggest filling a Tedlar bag with carbon-free air and injecting a concentration of EtO into the bag targeting a concentration in the Tedlar Bag of approximately 0.3 to 0.5 ppm. This type of evaluation would best replicate the sample matrix as measured by the GC.

Additional Information:

Going forward, it is important to use the procedures that were utilized during the Sterigenics for future tests, making sure to 1) verify the sampling testing locations meet all Method 1 criteria, 2) performing all required velocity traverses as required by the method, 3) use of heated sampling system (Method 18 – Section 8.2.2.1.1 and 8.2.2.1.2) to prevent moisture or organic condensation, 4) perform a successful recovery study for direct interface sampling (Method 18 – Section 8.4.1) to verify the efficacy of the sampling system, and 5) to select calibration standards that bracket the sample concentrations (Method 18 – Section 8.2.4.3). These are not recommendations, they are requirements of the method and failure to follow these procedures could be grounds for a regulatory authority to invalidate a test.

Please let me know if you have any questions,

Ned Shappley

40 CFR Part 136, Appendix B

....

(a) Select a spiking level, typically 2—10 times the estimated MDL in Section 1. Spiking levels in excess of 10 times the estimated detection limit may be required for analytes with very poor recovery (e.g., for an analyte with 10% recovery, spiked at 100 micrograms/L, with mean recovery of 10 micrograms/L; the calculated MDL may be around 3 micrograms/L. Therefore, in this example, the spiking level would be 33 times the MDL, but spiking lower may result in no recovery at all).

(b) Process a minimum of seven spiked samples and seven method blank samples through all steps of the method. The samples used for the MDL must be prepared in at least three batches on three separate calendar dates and analyzed on three separate calendar dates. (Preparation and analysis may be on the same day.) Existing data may be used, if compliant with the requirements for at least three batches, and generated within the last twenty four months. The most recent available data for method blanks and spiked samples must be used. Statistical outlier removal procedures should not be used to remove data for the initial MDL determination, since the total number of observations is small and the purpose of the MDL procedure is to capture routine method variability. However, documented instances of gross failures (e.g., instrument malfunctions, mislabeled samples, cracked vials) may be excluded from the calculations, provided that at least seven spiked samples and seven method blanks are available. (The rationale for removal of specific outliers must be documented and maintained on file with the results of the MDL determination.)

……

(ii) Compute the MDL_s (the MDL based on spiked samples) as follows:

$MDL_S = t_{(n-1,\ 1-\alpha = 0.99)} S_s$

Where:

MDL_s *= the method detection limit based on spiked samples*

$t_{(n-1,\ 1-\alpha = 0.99)}$ *= the Student's t-value appropriate for a single-tailed 99th percentile t statistic and a standard deviation estimate with n-1 degrees of freedom. See Addendum Table 1.*

S_s *= sample standard deviation of the replicate spiked sample analyses.*

Ned Shappley | USEPA|OAQPS|AQAD|Measurement Technology Group
109 TW Alexander Drive (E143-02) | Research Triangle Park, NC 27711
email: shappley.ned@epa.gov | Phone (919)541-7903

APPENDIX L

Permits/Protocols

ECSi

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397
BRUCE RAUNER, GOVERNOR ALEC MESSINA, DIRECTOR

217/785-1705

CONSTRUCTION PERMIT
NESHAP SOURCE

PERMITTEE

Sterigenics US, LLC
Attn: Laura Hartman, EHS Manager
2015 Spring Road, Suite 650
Oak Brook, Illinois 60523

Application No.: 18060020 I.D. No.: 043110AAC
Applicant's Designation: Date Received: June 11, 2018
Subject: Control of the Backvents of the Sterilization Chambers
Date Issued: June 26, 2018
Location: 7775 Quincy and 830 Midway, Willowbrook, DuPage County

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of control of the backvents of the sterilization chambers, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. Introduction

   a. This permit authorizes control of the existing backvents of the five sterilization chambers (SC-1, SC-2, SC-3, SC-4 and SC-5) at Sterigenic's Willowbrook facilities using the existing control systems that control emissions of ethylene oxide from the vacuum pumps and from aeration.

   b. This permit does not authorize changes to the sterilization chambers or other emission units at the source that would increase their capacity or emissions.

   c. For purposes of this permit, the existing sterilization chambers after their backvents are also connected to control systems are referred to as the "affected units."

2. Existing Requirements

   This permit does alter established requirements for the affected units, (i.e., applicable emission standards and requirements for testing, monitoring, recordkeeping and reporting), as identified in Sections 4.1 and 4.2 of the Clean Air Act Permit Program (CAAPP) permit for the source, Permit No. 95120085, issued June 8, 2015. In particular, the affected units will continue to be subject to federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Ethylene Oxide Emissions from Sterilization Facilities, 40 CFR 63 Subpart O.

3. Non-applicability Provisions

This permit is issued based on this project not constituting a major modification for purposes of the state rules for Major Stationary Sources Construction and Modification (MSSCAM), 35 IAC Part 203. This is because this project is an emission reduction project that will reduce emissions of volatile organic material.

4. Good Air Pollution Control Practices

At all times, the Permittee shall maintain and operate the affected units and associated air pollution control systems in a manner consistent with good air pollution control practices for minimizing emissions.

5. Notification

The Permittee shall notify the Illinois EPA within 30 days after completion of this project. This notification shall include the date that the backvent on each affected unit is first controlled.

6. Testing

a. Within 180 days of completion of this project, for the affected units, the Permittee shall perform performance testing in accordance with 40 CFR 63.365 and 63.7. The Permittee shall submit applicable notifications and reports for this testing as required by 40 CFR 63.7, 63.360, 63.365 and 63.366.

b. The following USEPA methods and procedures shall be used for testing, unless another USEPA method is approved by the Illinois EPA:

Flowrate	Method 2, 2A, 2B, 2C or 2D
Oxygen (O_2)/Carbon Dioxide (CO_2)	Method 3A or 3B
Moisture	Method 4 or 320
Ethylene Oxide/Propylene Oxide	Method 18 or 320

c. The Permittee shall submit a written test plan to the Illinois EPA for this testing and if a significant change in the procedures for this testing is planned from the procedures followed in the previous test. This plan shall be submitted at least 30 days prior to the actual date of testing and include the following information as a minimum:

i. A description of the planned test procedures.

ii. The person(s) who will be performing sampling and analysis and their experience with similar tests.

iii. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means or manner by which the operating parameters for the emission unit and any control equipment will be determined.

iv. The specific determinations of emissions and operation that are intended to be made, including sampling and monitoring locations.

v. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods.

d. The Permittee shall notify the Illinois EPA prior to conducting these measurements to enable the Illinois EPA to observe testing. Notification for the expected date of testing shall be submitted a minimum of 30 days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of the test. The Illinois EPA may accept shorter advance notice if it does not interfere with the Illinois EPA's ability to observe testing.

e. Copies of the Final Report(s) for these tests shall be submitted to the Illinois EPA within 30 days after the test results are compiled and finalized but no later than 60 days after completion of sampling. The Final Report shall include as a minimum:

i. General information, i.e., date of test, names of testing personnel, and names of Illinois EPA observers.

ii. A summary of results, e.g., VOM emissions, pounds.

iii. A detailed description of operating conditions of the emission unit(s) during testing, including:

A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.

B. Control equipment information, i.e., equipment condition and operating parameters during testing.

C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.

iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.

v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.

vi. Conclusions.

f. The Permittee shall retain copies of emission test reports for at least three years beyond the date that an emission test is superseded by a more recent test.

7. <u>Authorization to Operate</u>

The Permittee may operate the affected units with backvents ducted to the existing control systems pursuant to this construction permit until the CAAPP permit for the source is revised to address this project. This condition supersedes Standard Condition 6.

Please note that the Illinois EPA has not acted in this permit on Sterigenic's request for enforceable limits on the operation and emissions of its Willowbrook facilities so that this source is not a major source under relevant air pollution control regulations. The Illinois EPA is processing that request as a separate application.

If you have any questions on this permit, please contact Daniel Rowell at 217/558-4368.

Raymond E. Pilapil
Manager, Permit Section
Bureau of Air

REP:DBR:jlp
DBR
6/24/18

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
P. O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.

2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act, and Regulations adopted by the Illinois Pollution Control Board.

3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.

4. The Permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:

   a. to enter the Permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,

   b. to have access to and copy any records required to be kept under the terms and conditions of this permit,

   c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,

   d. to obtain and remove samples of any discharge or emission of pollutants, and

   e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.

5. The issuance of this permit:

   a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,

   b. does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities,

   c. does not release the Permittee from compliance with the other applicable statues and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,

   d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.

6. a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.

b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.

7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:

a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or

b. upon finding that any standard or special conditions have been violated, or

c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.

TEST PROTOCOL FOR AIR POLLUTION SOURCE TESTING OF AN ETHYLENE OXIDE EMISSION-CONTROL SYSTEM OPERATED BY STERIGENICS US, LLC. AT ITS WILLOWBROOK I, ILLINOIS FACILITY

Submitted to:

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1021 North Grand Avenue East
Springfield, Illinois 62794

Submitted by:

STERIGENICS US, LLC.
7775 South Quincy Street
Willowbrook, Illinois 60521

I.D. Number 043110AAC

Prepared by:

ECSI, INC.
PO Box 1498
San Clemente, California 92674-1498

Prepared on:

August 24, 2018

ECSi

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TEST DATE

September 20-21, 2018

REGULATORY AGENCY

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1.0 INTRODUCTION

ECSi, Inc. proposes to conduct air pollution source testing of the ethylene oxide (EtO) emission control system operated by Sterigenics US, LLC. at their Willowbrook I facility, located at 7775 S. Quincy Street. The device to be tested is the two stage AAT Safe Cell packed tower scrubber/dry bed reactor emission-control system, which is used to control emissions from fourteen sterilizer backvents and three aeration rooms. The purpose of the testing program will be to demonstrate compliance with backvent emission control requirements and the conditions established in the Air Quality Permit granted to Sterigenics by the Illinois Environmental Protection Agency (IEPA).

We have specialized exclusively in the performance of ethylene oxide source testing and leak testing since 1992, and are the nationally recognized expert in the field. When the current ethylene oxide emissions regulations were being implemented, we worked closely with the California Air Resources Board (CARB) and USEPA to help develop the currently used testing methodology.

2.0 EQUIPMENT

At Willowbrook I, sterilizer backvent emissions are controlled by:

- One two-stage Advanced Air Technologies Safe Cell emission-control system, comprised of a packed-tower chemical scrubber (SC1), equipped with a packed reaction/interface column, a scrubber fluid recirculation system, and a scrubber fluid reaction/storage tank, and a dry bed reactor/scrubber (SC2), comprised of a bank of solid-bed reaction vessels, connected in parallel, installed downstream of SC1 and upstream of a dedicated blower exhaust system.

3.0 TESTING

EtO source testing will be conducted in accordance with the procedures outlined in USEPA CFR40, Part 63.365, using USEPA Method 18 as specified. EtO emissions monitoring will be conducted simultaneously at the inlet and outlet of the Safe Cell System (the inlet of SC1 and the outlet of SC2) during the entire duration of the backvent phase of one of the fourteen sterilizers. A total of three backvent-phase test runs will be performed.

During the backvent phase, EtO emissions at the inlet and the outlet of the Safe Cell System will be determined using direct source sample injection into a gas chromatograph (GC). All testing will be conducted during normal process load conditions. All backvent testing will be performed with freshly sterilized product in the sterilizer. The testing program will be conducted in accordance with the procedures outlined in the following sections.

4.0 RULE/COMPLIANCE REQUIREMENTS

The EtO gas-sterilization system at the Willowbrook I facility is being tested to demonstrate compliance with EPA requirements, as specified in the IEPA Air Quality Permit. The following requirements must be met:

- The sterilizer backvent phase emissions must be vented to control equipment with an EtO emission-reduction efficiency of at least 99 % by weight.

Testing is required to demonstrate compliance with these requirements. Source testing of the emission-control system is required initially, and may be required periodically thereafter.

5.0 TEST METHOD REFERENCE

5.1 INTRODUCTION

EtO source testing will be conducted in accordance with the procedures outlined in USEPA CFR40, Part 63.365, using USEPA Method 18 as specified. EtO emissions monitoring will be conducted simultaneously at the inlet and outlet of the Safe Cell System during the entire duration of the backvent phase of one of the fourteen sterilizers. A total of three backvent-phase test runs will be performed.

During the backvent phase, EtO emissions at the inlet and the outlet of the Safe Cell System will be determined using direct source sample injection into a gas chromatograph (GC). All testing will be conducted during normal process load conditions. All backvent testing will be performed with freshly sterilized product in the sterilizer. The testing program will be conducted in accordance with the procedures outlined in the following sections.

Operation and documentation of process conditions will be performed by personnel from Sterigenics, Inc. using existing monitoring instruments installed by the manufacturer on the equipment to be tested. In accordance with the procedures established in USEPA CFR40, Part 63, Subpart O, scrubber liquor level will be recorded.

5.2 VOLUMETRIC FLOW MEASUREMENT

Exhaust gas flow at the outlet of SC2 will be determined by 40 CFR 60, Appendix A, Method 2C, using a standard pitot tube and an inclined-oil manometer. Sampling ports will be located in accordance with 40 CFR 60, Appendix A, Method 1. The test ports will be located far enough from any flow disturbances to permit accurate flow measurement.

Temperature measurements will be obtained from a type K thermocouple and thermometer attached to the sampling probe. Exhaust gas composition will be assumed to be >99% ambient air. Water vapor will be negligible and, based on previous test data, a default ambient value of 3 percent will be used for determination of exhaust gas composition and flow calculations.

5.3 CONTROL EFFICIENCY AND MASS EMISSIONS MEASUREMENT

The EtO concentration at the inlet and outlet of the Safe Cell System will be measured simultaneously following the procedures delineated in USEPA CFR40, Part 63.365. During backvent, vented gas will be analyzed by an SRI, Model 8610, portable gas chromatograph (GC), equipped with the following: dual, heated sample loops and injectors; dual columns; and dual detectors. A flame ionization detector (FID) will be used to quantify emissions at the emission-control device inlet, and a photoionization detector (PID) will be used to quantify emissions at the emission-control device outlet.

5.4 SAMPLE TRANSPORT

Source gas will be pumped to the GC at approximately 500-1000 cubic centimeters per minute (cc/min) from the sampling ports through two lengths of Teflon® sample line, each with a nominal volume of approximately 75 cubic centimeters (cc) and an outer diameter of 0.25 inch. At the outlet of SC2 the sampling ports will be located in the exhaust stack.

5.5 GC INJECTION

Source-gas samples will then be injected into the GC which will be equipped with two heated sampling loops, each containing a volume of approximately 2cc and maintained at 100 degrees Celsius (C). Injections will occur at approximately one-minute intervals during the sterilization chamber backvent phase. Helium will be the carrier gas for both FID and PID.

5.6 GC CONDITIONS

The packed columns for the GC will both be operated at 85 degrees C. The columns will be stainless steel, 6 feet long, 0.125 inch outer diameter, packed with 1 percent SP-1000 on 60/80 mesh Carbopack B.

Any unused sample gas will be vented from the GC system back to the inlet of the scrubber.

5.7 CALIBRATION STANDARDS

The FID used at the inlet will be calibrated for part-per-million-by-volume (ppmv)-level analyses using gas proportions similar to the following:

1) 100 ppmv EtO, balance nitrogen
2) 50 ppmv EtO, balance nitrogen (audit gas)
3) 10 ppmv EtO, balance nitrogen
4) 1 ppmv EtO, balance nitrogen

The PID used at the outlet will be calibrated for ppmv-level analyses using gas proportions similar to the following:

1) 100 ppmv EtO, balance nitrogen
2) 50 ppmv EtO, balance nitrogen (audit gas)
3) 10 ppmv EtO, balance nitrogen
4) 1 ppmv EtO, balance nitrogen

Each of these calibration standards will be in a separate, certified manufacturer's cylinder. Copies of the calibration gas laboratory certificates will be included with the final report.

5.8 SAMPLING DURATION

Backvent EtO measurements will be taken for the entire duration of the backvent phase, which will be 15 minutes. This will encompass a total sampling duration of 15 minutes for each backvent phase test run.

5.9 CONTROL-EFFICIENCY/MASS-EMISSIONS CALCULATIONS

Control efficiency of EtO will be calculated for the backvent phase. Control efficiency will be calculated for each data point which will be produced at each injection interval. The time-weighted-average (TWA) EtO control efficiency will be calculated using these results. Results of the control-efficiency testing will be summarized in the final report.

Mass emissions of EtO will be calculated using the following equation:

$$\text{MassRate} = (\text{VolFlow})(\text{MolWt})(\text{ppmv EtO}/10^6)/(\text{MolVol})$$

Where:

MassRate = EtO mass flow rate, pounds per minute

VolFlow = Corrected volumetric flow rate, standard cubic feet per minute at 68 degrees F

MolWt =	44.05 pounds EtO per pound mole
ppmv EtO =	EtO concentration, parts per million by volume
10^6 =	Conversion factor, ppmv per "cubic foot per cubic foot"
MolVol =	385.32 cubic feet per pound mole at one atmosphere and 68 degrees F

Mass emissions of EtO will be calculated for backvent. The results will be summarized in the final report.

6.0 TEST SCENARIO

Backvent testing will be performed during normal process load conditions, with freshly sterilized product in the sterilizer. Three test runs will be conducted in series to verify the performance of the emission-control system. The testing schedule will be as follows:

- Equipment setup and gas chromatograph calibration.
- Backvent Test Run #1 is performed with freshly sterilized product in one of the fourteen sterilizers. Sampling is performed at the inlet and outlet of the Safe Cell System.
- Backvent Test Run #2 is performed with freshly sterilized product in one of the fourteen sterilizers. Sampling is performed at the inlet and outlet of the Safe Cell System.
- Backvent Test Run #3 is performed with freshly sterilized product in one of the fourteen sterilizers. Sampling is performed at the inlet and outlet of the Safe Cell System.
- Post-calibration check performed and equipment breakdown.

7.0 QA/QC

7.1 FIELD TESTING QUALITY ASSURANCE

At the beginning of the test, the sampling system will be leak checked at a vacuum of 15 inches of mercury. The sampling system will be considered leak free when the flow indicated by the rotameters falls to zero.

At the beginning of the test, a system blank will be analyzed to ensure that the sampling system is free of EtO. Ambient air will be introduced at the end of the heated sampling line and drawn through the sampling system line to the GC for analysis. The resulting chromatogram also will provide a background level for non-EtO components (i.e. ambient air, carbon dioxide, water vapor) which are present in the source gas stream due to the ambient dilution air which is drawn into the emission-control device. This chromatogram, designated AMB, will be included with the calibration data in the final report.

7.2 CALIBRATION PROCEDURES

The GC system will be calibrated at the beginning and conclusion of each day's testing. Using the Peaksimple II analytical software, a point-to-point calibration curve will be constructed for each detector. A gas cylinder of similar composition as the calibration gases, but certified by a separate supplier, will be used to verify calibration gas composition and GC performance.

All calibration gases and support gases used will be of the highest purity and quality available. A copy of the laboratory certification for each calibration gas will be included in the final report.

8.0 FINAL TEST REPORT DESCRIPTION

The test results will be summarized in a written report. This report will be submitted to the IEPA no later than sixty days after the conclusion of the field testing. It will include results for EtO control efficiency of the emission-control device and mass emissions of EtO to the atmosphere from the emission-control device outlet. The report will contain:

- Summary tables with comparisons of the test results to rule limits;
- Copies of all intermediate data tables and calculation worksheets;
- Copies of all GC chromatograms from calibration runs and sample injections; and
- Laboratory calibration certificates for all calibration and audit gases and all applicable measurement instruments such as pitot tubes and thermocouples.

TEST PROTOCOL FOR AIR POLLUTION SOURCE TESTING OF AN ETHYLENE OXIDE EMISSION-CONTROL SYSTEM OPERATED BY STERIGENICS US, LLC. AT ITS WILLOWBROOK II, ILLINOIS FACILITY

Submitted to:

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1021 North Grand Avenue East
Springfield, Illinois 62794

Submitted by:

STERIGENICS US, LLC.
830 Midway Drive
Willowbrook, Illinois 60521

I.D. Number 043110AAC

Prepared by:

ECSI, INC.
PO Box 1498
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Prepared on:

August 24, 2018

ECSi

CONTACT SUMMARY

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TEST DATE

September 20-21, 2018

REGULATORY AGENCY

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7.0	QA/QC	10
7.1	Field Testing Quality Assurance	10
7.2	Calibration Procedures	10
8.0	FINAL TEST REPORT DESCRIPTION	11

1.0 INTRODUCTION

ECSi, Inc. proposes to conduct air pollution source testing of the ethylene oxide (EtO) emission control system operated by Sterigenics US, LLC. at their Willowbrook II facility, located at 830 Midway Drive. The device to be tested is the two stage AAT Safe Cell packed tower scrubber/dry bed reactor emission-control system, which is used to control emissions from four sterilizer vacuum pumps, four sterilizer backvents and two aeration rooms. The purpose of the testing program will be to demonstrate compliance with backvent emission control requirements and the conditions established in the Air Quality Permit granted to Sterigenics by the Illinois Environmental Protection Agency (IEPA).

We have specialized exclusively in the performance of ethylene oxide source testing and leak testing since 1992, and are the nationally recognized expert in the field. When the current ethylene oxide emissions regulations were being implemented, we worked closely with the California Air Resources Board (CARB) and USEPA to help develop the currently used testing methodology.

2.0 EQUIPMENT

At Willowbrook I, sterilizer backvent emissions are controlled by:

- One two-stage Advanced Air Technologies Safe Cell emission-control system, comprised of a packed-tower chemical scrubber (SC1), equipped with a packed reaction/interface column, a scrubber fluid recirculation system, and a scrubber fluid reaction/storage tank, and a dry bed reactor/scrubber (SC2), comprised of a bank of solid-bed reaction vessels, connected in parallel, installed downstream of SC1 and upstream of a dedicated blower exhaust system.

3.0 TESTING

EtO source testing will be conducted in accordance with the procedures outlined in USEPA CFR40, Part 63.365, using USEPA Method 18 as specified. EtO emissions monitoring will be conducted simultaneously at the inlet and outlet of the Safe Cell System (the inlet of SC1 and the outlet of SC2) during the entire duration of the backvent phase of one of the four sterilizers. A total of three backvent-phase test runs will be performed.

During the backvent phase, EtO emissions at the inlet and the outlet of the Safe Cell System will be determined using direct source sample injection into a gas chromatograph (GC). All testing will be conducted during normal process load conditions. All backvent testing will be performed with freshly sterilized product in the sterilizer. The testing program will be conducted in accordance with the procedures outlined in the following sections.

4.0 RULE/COMPLIANCE REQUIREMENTS

The EtO gas-sterilization system at the Willowbrook I facility is being tested to demonstrate compliance with EPA requirements, as specified in the IEPA Air Quality Permit. The following requirements must be met:

- The sterilizer backvent phase emissions must be vented to control equipment with an EtO emission-reduction efficiency of at least 99 % by weight.

Testing is required to demonstrate compliance with these requirements. Source testing of the emission-control system is required initially, and may be required periodically thereafter.

5.0 TEST METHOD REFERENCE

5.1 INTRODUCTION

EtO source testing will be conducted in accordance with the procedures outlined in USEPA CFR40, Part 63.365, using USEPA Method 18 as specified. EtO emissions monitoring will be conducted simultaneously at the inlet and outlet of the Safe Cell System during the entire duration of the backvent phase of one of the four sterilizers. A total of three backvent-phase test runs will be performed.

During the backvent phase, EtO emissions at the inlet and the outlet of the Safe Cell System will be determined using direct source sample injection into a gas chromatograph (GC). All testing will be conducted during normal process load conditions. All backvent testing will be performed with freshly sterilized product in the sterilizer. The testing program will be conducted in accordance with the procedures outlined in the following sections.

Operation and documentation of process conditions will be performed by personnel from Sterigenics, Inc. using existing monitoring instruments installed by the manufacturer on the equipment to be tested. In accordance with the procedures established in USEPA CFR40, Part 63, Subpart O, scrubber liquor level will be recorded.

5.2 VOLUMETRIC FLOW MEASUREMENT

Exhaust gas flow at the outlet of SC2 will be determined by 40 CFR 60, Appendix A, Method 2C, using a standard pitot tube and an inclined-oil manometer. Sampling ports will be located in accordance with 40 CFR 60, Appendix A, Method 1. The test ports will be located far enough from any flow disturbances to permit accurate flow measurement.

Temperature measurements will be obtained from a type K thermocouple and thermometer attached to the sampling probe. Exhaust gas composition will be assumed to be >99% ambient air. Water vapor will be negligible and, based on previous test data, a default ambient value of 3 percent will be used for determination of exhaust gas composition and flow calculations.

5.3 CONTROL EFFICIENCY AND MASS EMISSIONS MEASUREMENT

The EtO concentration at the inlet and outlet of the Safe Cell System will be measured simultaneously following the procedures delineated in USEPA CFR40, Part 63.365. During backvent, vented gas will be analyzed by an SRI, Model 8610, portable gas chromatograph (GC), equipped with the following: dual, heated sample loops and injectors; dual columns; and dual detectors. A flame ionization detector (FID) will be used to quantify emissions at the emission-control device inlet, and a photoionization detector (PID) will be used to quantify emissions at the emission-control device outlet.

5.4 SAMPLE TRANSPORT

Source gas will be pumped to the GC at approximately 500-1000 cubic centimeters per minute (cc/min) from the sampling ports through two lengths of Teflon® sample line, each with a nominal volume of approximately 75 cubic centimeters (cc) and an outer diameter of 0.25 inch. At the outlet of SC2 the sampling ports will be located in the exhaust stack.

5.5 GC INJECTION

Source-gas samples will then be injected into the GC which will be equipped with two heated sampling loops, each containing a volume of approximately 2cc and maintained at 100 degrees Celsius (C). Injections will occur at approximately one-minute intervals during the sterilization chamber backvent phase. Helium will be the carrier gas for both FID and PID.

5.6 GC CONDITIONS

The packed columns for the GC will both be operated at 85 degrees C. The columns will be stainless steel, 6 feet long, 0.125 inch outer diameter, packed with 1 percent SP-1000 on 60/80 mesh Carbopack B.

Any unused sample gas will be vented from the GC system back to the inlet of the scrubber.

5.7 CALIBRATION STANDARDS

The FID used at the inlet will be calibrated for part-per-million-by-volume (ppmv)-level analyses using gas proportions similar to the following:

1) 100 ppmv EtO, balance nitrogen
2) 50 ppmv EtO, balance nitrogen (audit gas)
3) 10 ppmv EtO, balance nitrogen
4) 1 ppmv EtO, balance nitrogen

The PID used at the outlet will be calibrated for ppmv-level analyses using gas proportions similar to the following:

1) 100 ppmv EtO, balance nitrogen
2) 50 ppmv EtO, balance nitrogen (audit gas)
3) 10 ppmv EtO, balance nitrogen
4) 1 ppmv EtO, balance nitrogen

Each of these calibration standards will be in a separate, certified manufacturer's cylinder. Copies of the calibration gas laboratory certificates will be included with the final report.

5.8 SAMPLING DURATION

Backvent EtO measurements will be taken for the entire duration of the backvent phase, which will be 15 minutes. This will encompass a total sampling duration of 15 minutes for each backvent phase test run.

5.9 CONTROL-EFFICIENCY/MASS-EMISSIONS CALCULATIONS

Control efficiency of EtO will be calculated for the backvent phase. Control efficiency will be calculated for each data point which will be produced at each injection interval. The time-weighted-average (TWA) EtO control efficiency will be calculated using these results. Results of the control-efficiency testing will be summarized in the final report.

Mass emissions of EtO will be calculated using the following equation:

$$\text{MassRate} = (\text{VolFlow})(\text{MolWt})(\text{ppmv EtO}/10^6)/(\text{MolVol})$$

Where:

MassRate = EtO mass flow rate, pounds per minute

VolFlow = Corrected volumetric flow rate, standard cubic feet per minute at 68 degrees F

MolWt =	44.05 pounds EtO per pound mole
ppmv EtO =	EtO concentration, parts per million by volume
10^6 =	Conversion factor, ppmv per "cubic foot per cubic foot"
MolVol =	385.32 cubic feet per pound mole at one atmosphere and 68 degrees F

Mass emissions of EtO will be calculated for backvent. The results will be summarized in the final report.

6.0 TEST SCENARIO

Backvent testing will be performed during normal process load conditions, with freshly sterilized product in the sterilizer. Three test runs will be conducted in series to verify the performance of the emission-control system. The testing schedule will be as follows:

- Equipment setup and gas chromatograph calibration.
- Backvent Test Run #1 is performed with freshly sterilized product in one of the four sterilizers. Sampling is performed at the inlet and outlet of the Safe Cell System.
- Backvent Test Run #2 is performed with freshly sterilized product in one of the four sterilizers. Sampling is performed at the inlet and outlet of the Safe Cell System.
- Backvent Test Run #3 is performed with freshly sterilized product in one of the four sterilizers. Sampling is performed at the inlet and outlet of the Safe Cell System.
- Post-calibration check performed and equipment breakdown.

7.0 QA/QC

7.1 FIELD TESTING QUALITY ASSURANCE

At the beginning of the test, the sampling system will be leak checked at a vacuum of 15 inches of mercury. The sampling system will be considered leak free when the flow indicated by the rotameters falls to zero.

At the beginning of the test, a system blank will be analyzed to ensure that the sampling system is free of EtO. Ambient air will be introduced at the end of the heated sampling line and drawn through the sampling system line to the GC for analysis. The resulting chromatogram also will provide a background level for non-EtO components (i.e. ambient air, carbon dioxide, water vapor) which are present in the source gas stream due to the ambient dilution air which is drawn into the emission-control device. This chromatogram, designated AMB, will be included with the calibration data in the final report.

7.2 CALIBRATION PROCEDURES

The GC system will be calibrated at the beginning and conclusion of each day's testing. Using the Peaksimple II analytical software, a point-to-point calibration curve will be constructed for each detector. A gas cylinder of similar composition as the calibration gases, but certified by a separate supplier, will be used to verify calibration gas composition and GC performance.

All calibration gases and support gases used will be of the highest purity and quality available. A copy of the laboratory certification for each calibration gas will be included in the final report.

8.0 FINAL TEST REPORT DESCRIPTION

The test results will be summarized in a written report. This report will be submitted to the IEPA no later than sixty days after the conclusion of the field testing. It will include results for EtO control efficiency of the emission-control device and mass emissions of EtO to the atmosphere from the emission-control device outlet. The report will contain:

- Summary tables with comparisons of the test results to rule limits;
- Copies of all intermediate data tables and calculation worksheets;
- Copies of all GC chromatograms from calibration runs and sample injections; and
- Laboratory calibration certificates for all calibration and audit gases and all applicable measurement instruments such as pitot tubes and thermocouples.

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September 7, 2018 Sent via email

Julie Armitage
Illinois Environmental Protection Agency
Bureau of Air
1021 North Grand Avenue East
Springfield, Illinois 62702

Kevin Mattison
Illinois Environmental Protection Agency
Bureau of Air / Compliance Section
9511 Harrison Street
Des Plaines, IL 60016

Re: Waiver Request of Construction Permit Test Notification Requirements, and Additional Test Protocol Information for Sterigenics Willowbrook I and II Facilities
Facility I.D. No: 043110AAC

Ms. Armitage and Mr. Mattison:

In our recent conversations, we discussed our shared interest in conducting performance testing of the Willowbrook facilities' control equipment as quickly as possible after recently tying in our sterilization chamber backvents into each facility's existing emission control equipment. This letter formally requests IEPA's waiver of the 30 and 5 day performance test notification requirements found in the project's Construction Permit (Application No. 18060020), at Conditions 6 c. and 6 d. If the waiver of notification requirements is granted, then we would plan to commence performance testing beginning in the morning on Saturday, September 8 at approximately 7:00am at Willowbrook I, 7775 Quincy Street. Testing at Willowbrook II will commence at approximately noon.

This letter also provides additional information regarding the previously submitted test protocol we submitted in our last letter. Based on guidance from Mr. Mattison, this information will serve to provide further details about the planned test procedures and how test results are to be generated. With this additional information, we also request that IEPA grant its approval of the updated test protocol.

Please contact me to further discuss this matter. You can reach me at 630-928-1771 or email: kwagner@sterigenics.com.

Regards,

Kevin Wagner
Director, EH&S

Enclosures:

Sterigenics International LLC
2015 Spring Road, Suite 650 • Oak Brook, IL 60523
Tel 630.928.1700 • Fax 630.928.1701 • www.sterigenics.com

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Test Protocol Addendum for both Willowbrook I and Willowbrook II

2.0 EQUIPMENT

Process parameters for both AAT emission control devices will be measured prior to testing. One measurement of the scrubber would be representative of scrubber conditions throughout the testing. Based on the total volume of the scrubber liquor, it isn't anticipated that an appreciable change in liquor level or pH will occur over the course of testing. In accordance with the site's air permit the scrubber tank level will be measured along with the liquor pH.

3.0 TESTING

Once a sterilization chamber cycle ends, our process requires the chamber door to be partially opened for 15 minutes which vents the EO in the chamber to reduce levels in the chamber and exposure to employees. The 15-minute duration ensures the highest concentration of EO is removed from the chamber prior to unloading the product. During this venting, EO exhausts thru the backvent and to the AAT scrubber. In accordance with our procedures, workers are not allowed to enter or unload the chamber until the 15-minute time period has passed. Once the 15-minutes has passed, the product is unloaded to the aeration room.

The Willowbrook facility utilizes different sterilization cycles based on FDA validated cycles. The EO concentration in the chamber prior to the backvent phase can vary. Therefore, the higher ending concentrations will represent the highest amount of EO exhausted thru the backvents to the AAT scrubber.

In order to meet Condition 6 of the Construction Permit, each test run will be completed on the backvents using freshly sterilized product from one chamber for a 15-minute duration, for a total of three test runs at each facility. The emission testing will use chambers with higher ending EO concentrations for testing. Each test interval will test the first 15-minutes the backvent is opened and exhausted to the scrubber. Once the 15 minutes ends, product will be unloaded from the chamber and placed into the aeration rooms which are continuously vented to the same AAT scrubber throughout the test.

Recording data

Sterigenics will record process data during the performance testing to identify which chamber was utilized and the sterilization cycle number for each test. This process data will be summarized in a table which will be provided in the final report. In addition to the process data collection, Sterigenics will record pH and scrubber liquor level of the AAT scrubber prior to the test. This information will also be

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furnished with the process data in the final report. Due to the AAT scrubber size and design, these parameters do not change significantly during the course of a day which exceeds the performance testing duration.

SECTION 5.0 TEST METHOD REFERENCE

The protocol indicated the CO2/O2 will not be measured, rather the stack will be assumed to be ambient air. The assumed molecular weight of the stack gas will be 29.

5.2 VOLUMETRIC FLOW MEASUREMENT

Method 2C will be utilized to test volumetric flow. The sample port used for the Method 18 inlet and outlet will be used for Method 2C. Please see attached Figure 1 for a drawing of the test locations in accordance with USEPA Method 1 or 1a. The absence of cyclonic flow will be verified during the test program.

5.4 SAMPLE TRANSPORT

In addition to the description of the sample transport in the protocol, the lines used for testing will be heated above 110°C. Source gas will be pumped to the GC with a response time of 5-10 seconds.

5.7 CALIBRATIONS

Calibration will be performed in triplicate prior to and at the end of each test day. Limit of detection will be determined.

6.0 TEST SCENARIO

As discussed above, backvent testing will be performed during normal process load conditions, with freshly sterilized product in the sterilization chambers. Three test runs will be conducted in series to verify the performance of the emission-control system.

Sterilization chamber cycles can range from 8 – 12 hours. Sterigenics will schedule three chambers to end the sterilization cycle to allow for the three test runs to run consecutively, however, due to the range in cycle time, it may be necessary to wait for the chamber cycle to end prior to beginning the subsequent testing.

The sample testing will begin at approximately 7:00 am on Saturday, September 8, 2018. The equipment will be set up Friday evening. Calibration of the chromatograph system will be completed prior to beginning the test at Willowbrook 1 and then again prior to beginning the test at Willowbrook 2.

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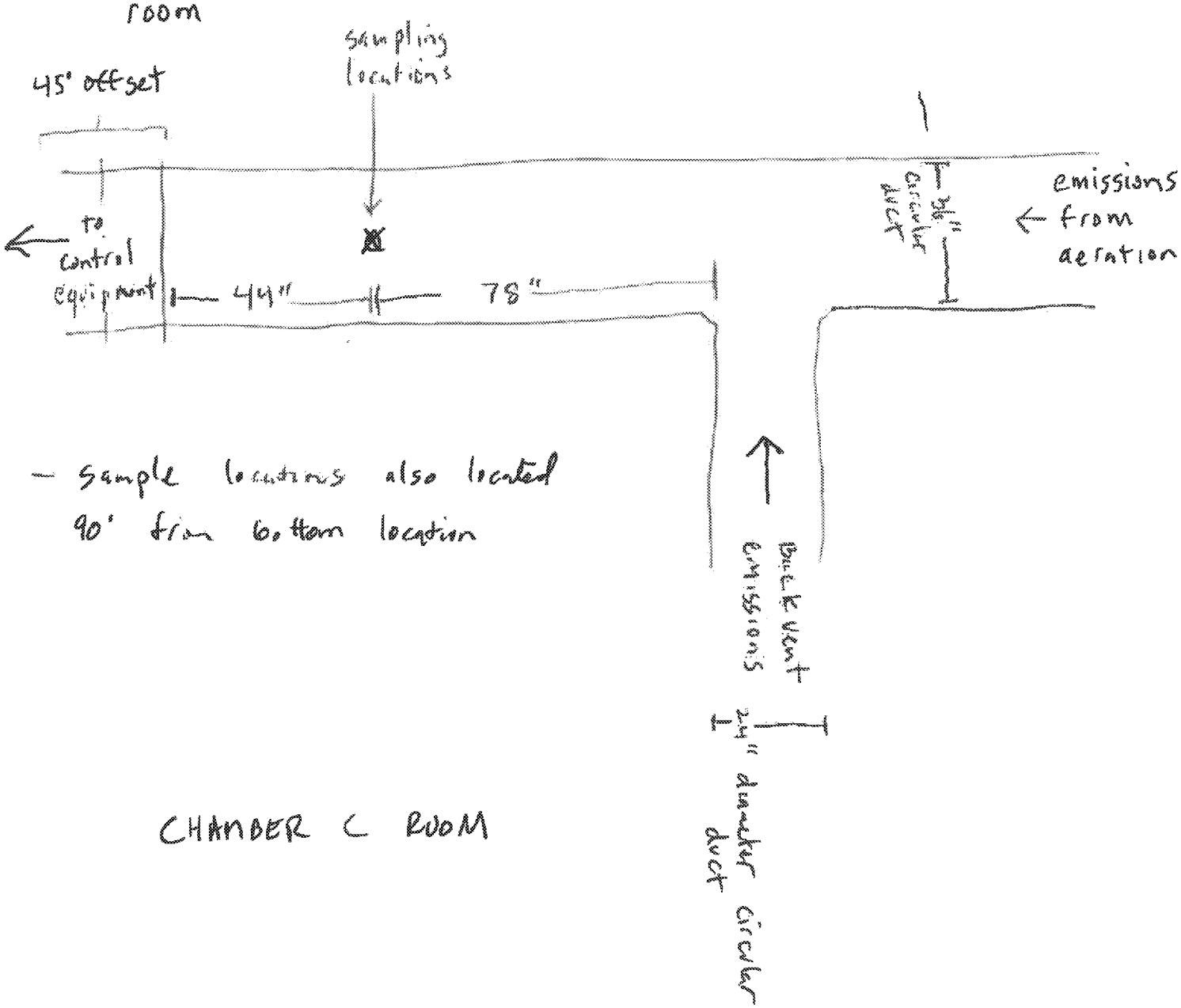
Test Scenario Time Line

	Sequence for each facility	Method/Reference
	Sample port locations established	Method 1
	3-point calibration performed in triplicate.	Method 18
	Obtain meteorological data for sampling time. Conduct calculation based on Method 4.	Method 4
SAMPLE 1	Flow traverse of inlet and outlet conducted to establish measurement centroid, confirm absence of cyclonic flow.	Method 2
7:00 am	Chamber door opened, actuator switch activates backvent	N/A
	First sample initiated	Method 18
	Samples at inlet and outlet taken approximately every 1-minute for a total of 15-minutes	Method 18
	Flow monitoring sampled approximately every 1-minute.	
	Recovery study performed	Method 18
Each sample run will follow the same steps as sample 1		
End of 3 samples	Post calibration	

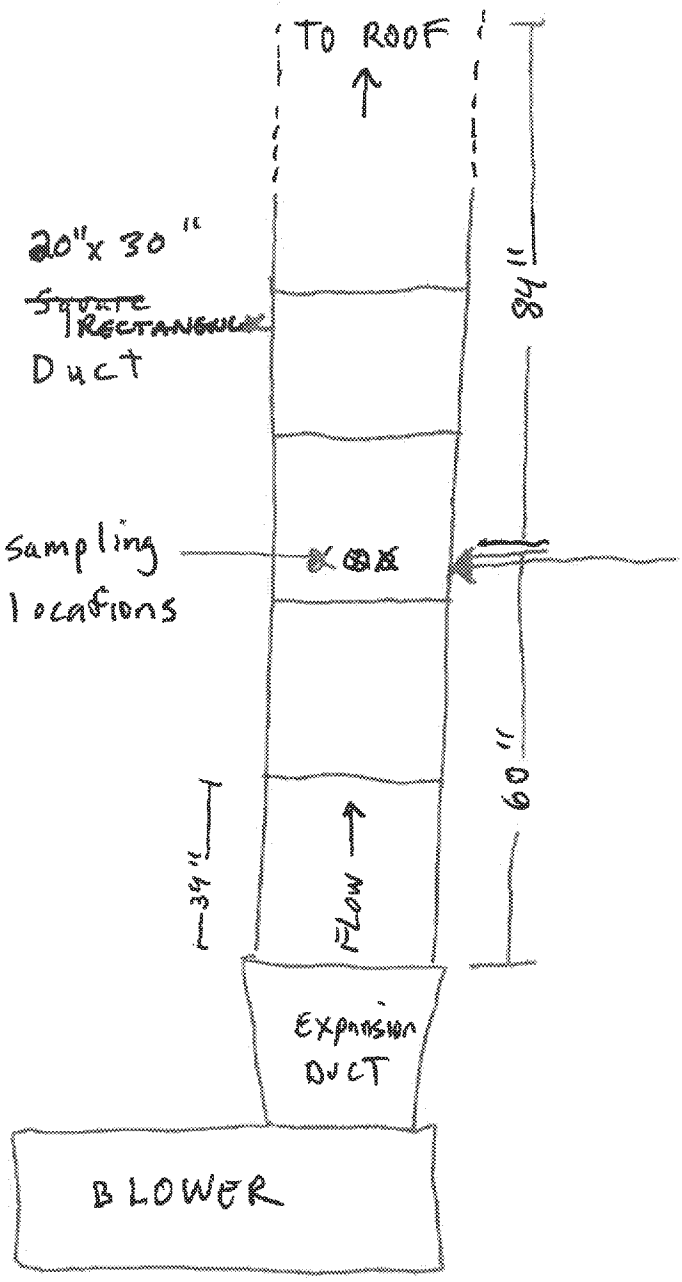
WB I INLET TEST LOCATION

- view is looking above at ceiling of chamber C room



- sample locations also located 90' from bottom location

WB I OUTLET TEST LOCATION

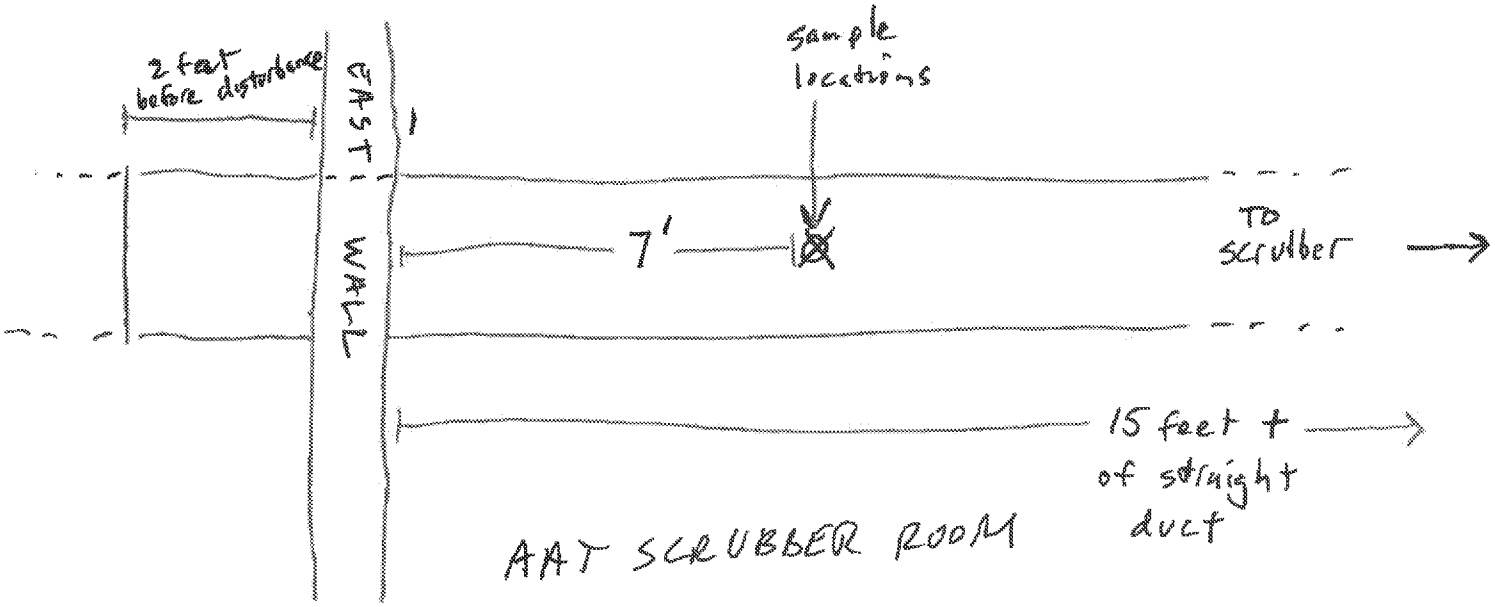


- Main stretch of ducting is 20" x 30" ~~square~~ rectangular duct
- Sample points are located 84" ~~from~~ below top-most disturbance and 60" above lowest disturbance

ART DRYBED ROOM

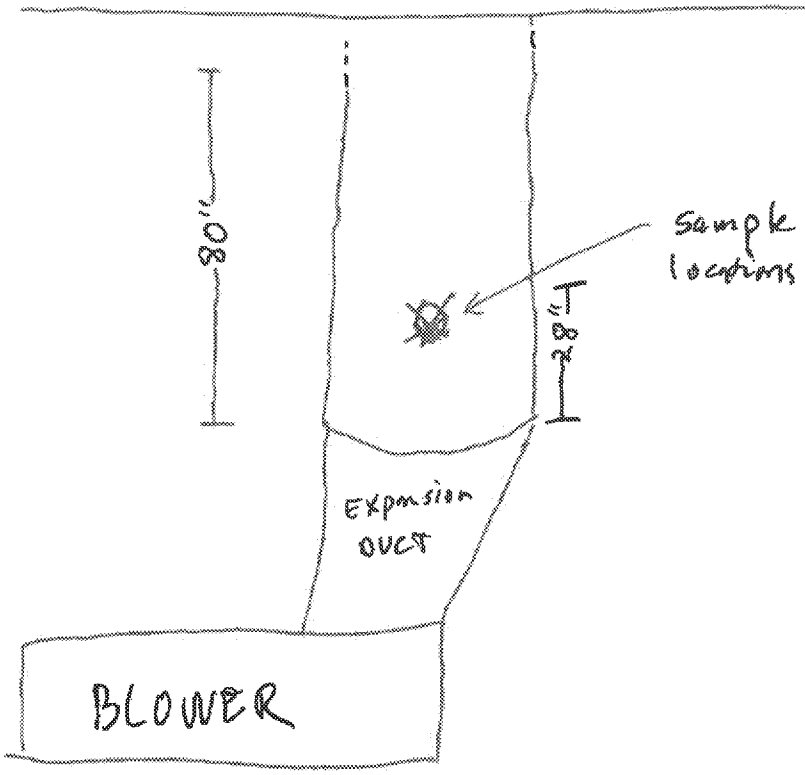
WB II INLET TEST LOCATION

- View is looking up at ceiling of AAT Scrubber Room



- sample locations also located 90' from bottom location.

WBII OUTLET TEST LOCATION



— 28" diameter circular duct

— sample locations also located 90° from front location

AAT DRYBED ROOM

* sample point will be located in straight run. Verified to meet Method prior to test.

From: "Armitage, Julie" <Julie.Armitage@Illinois.gov>
Date: September 7, 2018 at 6:34:23 PM CDT
To: "Hoffman, Kathy" <[redacted]>
Cc: "Mattison, Kevin" <Kevin.Mattison@Illinois.gov>

By this email, at your request, and to facilitate the shared goal of expedited emissions testing, the Bureau of Air provides notice that it is waiving the timeframe for test plan submittal (30 days prior to testing – condition 6c) and the timeframe for notification of expected and actual test dates (30 and 5 days, respectively – condition 6d) under construction permit No. 18060020 issued June 26, 2018. Also, the Bureau provides notice that, after review and consultation with the USEPA, it is accepting the protocol received August 28, 2018, and supplemented September 7, 2018, conditioned upon the testing scheduled for September 8th, being performed in accordance with USEPA reference methods and supported by a detailed final report that evidences the validity of the test, adherence to reference methods, and compliance with all relevant permit terms.

Should you have comments or questions regarding this matter, pleased direct them to my attention or to that of Kevin Mattison of my staff who will be present for the September 8th testing.

State of Illinois - CONFIDENTIALITY NOTICE: The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 10/22/2018 11:58:49 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Re: Phone message

Yes

On Oct 22, 2018, at 7:28 PM, Wehrum, Bill <Wehrum.Bill@epa.gov> wrote:

Clint - Would you please give him a call? Thanks.

_____
Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

Begin forwarded message:

From: "Rakosnik, Delaney" <rakosnik.delaney@epa.gov>
Date: October 22, 2018 at 10:25:53 AM EDT
To: "Wehrum, Bill" <Wehrum.Bill@epa.gov>
Subject: Phone message

Hi Bill,

Tom Roberts called from Van Ness Feldman. He represents Sterigenics and needs to ask you a quick question.

Please call him at 202-365-7750.

Thanks,

Delaney Rakosnik
Staff Assistant
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-0935
Email: rakosnik.delaney@epa.gov

Message

From: Macnabb, Philip [PMacnabb@sterigenics.com]
Sent: 11/7/2018 7:09:33 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: tcr@vnf.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=60634a7f78964380838648935cd3d7b1-tcr@vnf.com]; Taylor, Byron F. [bftaylor@sidley.com]
Subject: Sterigenics Meeting

Bill

I apologize for the late notice, but I will need to cancel our meeting scheduled for tomorrow November 8th in your office. I have a board meeting in Florida tomorrow and logistics will not allow me to get there in time. I do feel it is important for us to get together face to face and am hoping you are open to turning our Monday call on the 12th into a face to face meeting. Again, I would come to your office, likely accompanied by Byron Taylor from Sidley Austin as Tom Roberts will be out of town that day. I will call your assistant to coordinate.

As a follow up to our conversation this week, when Ed Nam from your Region 5 office shared with us that they had performed air monitoring in the Willowbrook area, we considered the question of whether there is a background ambient concentration of ethylene oxide that might affect the interpretation of the data collected. Our consultant identified an EPA database that had ambient monitoring results for ethylene oxide from locations in New Hampshire and Rhode Island. I have included a link to that database below, so you can evaluate it, too. Our consultant found detectable concentrations of ethylene oxide in nearly 3,600 of the approximately 13,000 data points. The average ambient concentration in the data set was about 0.29 ug/m3. We shared this information with Mr. Nam via email on August 19th, before the ATSDR report was issued.

The database can be found at this link: https://www3.epa.gov/ttnamti1/toxdat.html#data.

Thanks again, and feel free to contact me directly with any questions

Philip Macnabb
President
Sterigenics, A Sotera Health company
2015 Spring Rd, Suite 650
Oak Brook, IL 60523
pmacnabb@sterigenics.com
www.sterigenics.com
O: (630) 928-1733

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Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 9/17/2018 6:58:03 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: Sterigenics letter
Attachments: STERIGENICS - NAM LETTER_09-17-2018_11-14-01.pdf; ATT00001.htm

Begin forwarded message:

From: "Koerber, Mike" <Koerber.Mike@epa.gov>
Date: September 17, 2018 at 2:31:27 PM EDT
To: "Woods, Clint" <woods.clint@epa.gov>, "Tsirigotis, Peter" <Tsirigotis.Peter@epa.gov>, "Sasser, Erika" <Sasser.Erika@epa.gov>, "Wayland, Richard" <Wayland.Richard@epa.gov>, "Shappley, Ned" <Shappley.Ned@epa.gov>, "Smith, Darcie" <Smith.Darcie@epa.gov>, "Bremer, Kristen" <Bremer.Kristen@epa.gov>, "Davis, Alison" <Davis.Alison@epa.gov>, "Caparoso, Jennifer" <Caparoso.Jennifer@epa.gov>, "Witt, Jon" <Witt.Jon@epa.gov>
Subject: FW: Sterigenics letter

FYI

From: Nam, Ed
Sent: Monday, September 17, 2018 2:16 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>
Subject: FW: Sterigenics letter

Mike,

Please see the attached letter from the IL Attorney General's office that just came in.
We are still working on the revised website and will have something for your folks to review soon.

-Ed

From: Wallace, Elizabeth [mailto:EWallace@atg.state.il.us]
Sent: Monday, September 17, 2018 11:38 AM
To: Nam, Ed <nam.ed@epa.gov>
Cc: Payne, James <payne.james@epa.gov>; Nelson, Leverett <nelson.leverett@epa.gov>; John.J.kim@illinois.gov; lisa.smith@dupageco.org; Dunn, Matthew <MDunn@atg.state.il.us>
Subject: Sterigenics letter

Good morning,

Please see the attached letter. If you have questions or wish to discuss further, Matt Dunn's direct line is (217) 524-5511, and my direct line is below.

Thank you for your assistance and we look forward to continuing to work with you on this matter.

Best regards,

Beth

Elizabeth Wallace, Chief
Environmental Bureau / Chicago
Office of the Illinois Attorney General
69 W. Washington St., 18th Flr.
Chicago, IL 60602
(312)814-5396
(312)814-2347 (fax)
ewallace@atg.state.il.us

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 10/3/2018 12:35:23 PM
To: DeLuca, Isabel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b021c30cbee4637a7c7ca683e5e044a-IDELUCA]
CC: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Millett, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c067caa6c93544f78c26ab08cc567d27-Millett, John]
Subject: Re: In about-face, Gov. Bruce Rauner calls for Sterigenics shutdown after weeks of downplaying cancer risks - Chicago Tribune

Thanks. Updated Willowbrook site is available here, and Kelly R will be taking lead on any additional inquiries from IL officials:

https://www.epa.gov/il/sterigenics-willowbrook-facility

On Oct 3, 2018, at 8:32 AM, DeLuca, Isabel <DeLuca.Isabel@epa.gov> wrote:

> In case you haven't seen this:

http://www.chicagotribune.com/news/local/breaking/ct-met-bruce-rauner-sterigenics-shutdown-20181002-story.html

In about-face, Gov. Bruce Rauner calls for Sterigenics shutdown after weeks of downplaying cancer risks

Michael Hawthorne

After spending the past month downplaying cancer risks from toxic air pollution in west suburban Willowbrook, Gov. Bruce Rauner on Tuesday joined a chorus of elected officials calling for the shutdown of a Sterigenics International facility co-owned by his former private equity firm.

Fellow Republicans from DuPage County have been clamoring for Rauner to take more aggressive action against the company, which for more than three decades has used highly potent ethylene oxide gas to sterilize medical instruments, pharmaceutical drugs and food near densely populated neighborhoods and several schools.

As recently as Friday, the most the Republican governor would say about Sterigenics was that he had instructed the Illinois Environmental Protection Agency to launch an investigation. But Rauner changed course after the weekend, ordered his staff to refer the case to Illinois Attorney General Lisa Madigan, the state's chief lawyer, then urged the Democrat to seek a court order that would close the Willowbrook facility until a separate federal investigation "assures the community that resumed operations would not present an elevated health risk."

Rauner's sudden reversal comes as local politicians, many of whom like the governor are on the Nov. 6 ballot, face a fury of complaints about a federal report that revealed unusually high cancer risks from ethylene oxide pollution in traditionally Republican communities near Sterigenics. Citizen groups that quickly organized against the company garnered even more attention when Burr Ridge resident Andrea Thome and her husband, former Chicago White Sox slugger Jim Thome, added their voices to the anti-Sterigenics movement.

"There is a level of anger in the community that I've never seen before," said longtime state Rep. Jim Durkin of Darien, the House Republican leader and one of several DuPage County officials calling for Sterigenics to be shut down. "This area is populated by young families who are moving here from the city. I know people within a half-mile of the facility who feel they aren't getting any answers and they don't feel anybody is standing up on their behalf."

The Tribune previously reported that quick action is unlikely for a variety of reasons, including steps the Rauner administration took before and after the Willowbrook cancer report was released to the public in late August.

Nearly two months earlier, the Illinois EPA responded to the then-secret report by quietly giving Sterigenics a permit to voluntarily install new pollution-control equipment, making it more difficult for authorities to pursue legal action against the company unless it can be proved that the fix has failed to eliminate health risks from ethylene oxide pollution.

Rauner appointees later refused to provide Madigan's office with key documents about the Willowbrook facility, required the attorney general's staff to request the records under the Freedom of Information Act and delayed providing the information until after the Tribune inquired about the dispute on Sept. 20. Even now, Madigan said, the state can't make an effective case against Sterigenics without more air quality monitoring in surrounding neighborhoods, expert analysis of the results and other information that only the state or federal EPA can provide.

"We are prepared to move forward in court and have told IEPA what evidence is necessary to shut the site down," Madigan said. "IEPA has not provided any evidence, but we will immediately evaluate any information the agency provides."

With Election Day just a few weeks away, locally elected officials have repeatedly urged state and federal regulators to reassure the public they are safe. Rauner, along with top Trump administration officials at the U.S. Environmental Protection Agency, have stressed that there is no evidence Sterigenics poses the type of immediate threats seen in some work settings. But the company has been releasing ethylene oxide into surrounding communities since the early 1980s, federal records show, and the health risks involve diseases that can take years to develop, including breast cancer, leukemia and lymphoma.

Based on air samples collected in May, an arm of the federal Centers for Disease Control and Prevention determined the cancer risks from breathing ethylene oxide pollution in southeast DuPage communities could be orders of magnitude higher than initially estimated: up to 6,400 per million, or more than six cases of cancer for every 1,000 people. The U.S. EPA generally targets polluters when local cancer risks exceed 100 in a million.

The pre-election political stakes are high enough that the Trump administration weighed in on the issue last week, dispatching a presidential appointee in charge of the EPA's air division to promise the agency will conduct the type of neighborhood air monitoring that Madigan and others have been calling for during the past month.

Sterigenics said a controlled test of emissions, conducted in late September by consultants hired by the company, failed to detect any ethylene oxide leaving its pair of buildings in Willowbrook.

"We are committed to doing the right thing by our community but closing facilities that emit limited, regulated (ethylene oxide) emissions is not the right answer," the company said in a statement, calling Rauner's latest reaction "ill-considered." "If necessary, we will take all appropriate actions to protect the hospitals and patients that depend on our facility."

Rauner's ties to the company date to 2011, when a private equity firm he co-founded bought Sterigenics for $675 million and quickly expanded its operations. The governor's most recent state ethics statement, filed in May, shows he retains an interest in the fund used to buy the sterilization company, which in 2015 sold a majority stake to another private equity firm.

On Friday morning, Rauner told radio station WBEZ he no longer has a stake in Sterigenics. Spokespeople for his campaign and government office later told the Tribune that Rauner sold his interest as part of the 2015 deal but have not produced documents showing the transaction took place.

"We will get the truth about what has been emitted so far," Rauner told the radio station, "and what needs to change in the future."

mhawthorne@chicagotribune.com

Twitter @scribeguy

MORE COVERAGE

After weeks of public outrage about Sterigenics, Trump EPA to test air in surrounding neighborhoods »

Rauner EPA withholds Sterigenics records from attorney general until local Republicans intervene »

High cancer risk in southeast DuPage County linked to company co-owned by Rauner's former firm »

Jeff Kelley
Director, Office of External Communications
U.S. EPA Region 5
ph: 312-353-1159

Appointment

From: Gunasekara, Mandy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=53D1A3CAA8BB4EBAB8A2D28CA59B6F45-GUNASEKARA,]
Sent: 11/5/2018 9:02:11 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Declined: Phone call with Phil Macnabb re: Sterigenics (confirmed)
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 11/5/2018 9:00:00 PM
End: 11/5/2018 9:30:00 PM

Recurrence: (none)

Message

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 11/2/2018 2:57:12 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Atkinson, Emily [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb2155adef6a44aea9410741f0c01d27-Atkinson, Emily]
Subject: Sterigenics website

Hi Bill,

Phil MacNabb from Sterigenics wanted to share his public forum with you, per your request. It's how they share information with the public.

https://www.sterigenicswillowbrook.com/

Thanks,

Delaney Rakosnik
Staff Assistant
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406A, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-0935
Email: rakosnik.delaney@epa.gov

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 2/22/2019 9:08:43 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Meeting Forward Notification: Call with Region 5 re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM

Recurrence: (none)

Your meeting was forwarded

Newton, Cheryl has forwarded your meeting request to additional recipients.

Meeting

Call with Region 5 re: Sterigenics

Meeting Time

Friday, February 22, 2019 4:15 PM-5:00 PM.

Recipients

Thiede, Kurt

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 2/22/2019 4:38:50 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Meeting Forward Notification: Call with Region 5 re: Sterigenics
Location: WJC - N + Personal Phone / Ex. 6

Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM

Recurrence: (none)

Your meeting was forwarded

Schwab, Justin has forwarded your meeting request to additional recipients.

Meeting

Call with Region 5 re: Sterigenics

Meeting Time

Friday, February 22, 2019 4:15 PM-5:00 PM.

Recipients

Leopold, Matt (OGC)

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Message

From: DeLuca, Isabel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0B021C30CBEE4637A7C7CA683E5E044A-IDELUCA]
Sent: 8/21/2018 10:46:06 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Millett, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c067caa6c93544f78c26ab08cc567d27-Millett, John]
Subject: NATA comms
Attachments: 20180821-Sterigenics_desk_statement.docx; NATA desk statement 8.21.18.docx; Ethylene Oxide Fact Sheet.Final.8.21.18.pdf; 2014 NATA Overview Fact Sheet..pdf

Hi Bill and Clint,

The R5 desk statement on Sterigenics is attached for your review. I've also attached the HQ desk statement, NATA fact sheet, and EtO fact sheets – OPA sent these to the regions this afternoon.

Clint— if the R5 desk statement looks ok to you, can you please forward to John Konkus (and cc me so I know it's final too)? John wants to make sure this has cleared OAR IO before he approves.

The plan is to post NATA tomorrow at 2 pm.

Thanks,
Isabel

Isabel DeLuca
Office of Air and Radiation, US EPA
(202) 343-9247

2014 National Air Toxics Assessment: Fact Sheet

Overview

- On August 22, 2018, the U.S. Environmental Protection Agency (EPA) released the sixth National Air Toxics Assessment (NATA), the Agency's tool that provides information on potential health risks from breathing air toxics, also known as hazardous air pollutants.
- NATA is a *screening tool*, intended to help EPA and state, local and tribal air agencies determine if areas, pollutants or types of pollution sources need to be examined further to better understand risks to public health.
- NATA provides broad estimates of the risk of developing cancer and other serious health effects over census tracts across the country. It does not estimate any person's individual risk. (See "Using NATA," on page 2 of this fact sheet.)
- The version of NATA released today is based on emissions for the calendar year 2014. It includes estimates of exposure and risk for 180 air toxics that EPA regulates under the Clean Air Act. It also estimates exposure and risks for diesel particulate matter (noncancer effects only).

EPA Taking Steps to Address Emissions of Ethylene Oxide

The 2014 NATA shows that several areas could have elevated cancer risks from long-term exposure to the chemical *ethylene oxide*. These elevated risks are largely driven by an EPA risk value that was updated in late 2016.

Based on the NATA result, EPA is using its tools under the Clean Air Act to address emissions of ethylene oxide from certain types of industries.

Learn more

- Nationwide, total emissions of air toxics are declining, and air quality monitoring data show that concentrations of many toxics in the air, such as benzene, also are trending downward.
- The 2014 NATA estimates that the nationwide average cancer risk from air toxics exposure is 30 in 1 million. About half of that risk comes from the formation of formaldehyde – produced when other pollutants chemically react in the air. This is known as *secondary formation*, and comes from emissions from industries, mobile sources, and natural sources. The other half of the nationwide cancer risk comes from pollution that is *directly emitted* to the air.
- Despite improvements, some local areas still face challenges. The 2014 NATA results also indicate that some census tracts may have elevated risks of cancer from air toxics exposure

(less than 1 percent of all tracts). Census tracts are small subdivisions of a county or county equivalent, such as a parish. Industrial emissions of three pollutants – ethylene oxide, chloroprene and coke oven emissions – contribute to most of the risk in these tracts. *See box above for more information on ethylene oxide.*

- When NATA shows a potential cancer risk of greater than 100 in 1 million at a census tract, it means there may be an elevated cancer risk in that tract. A risk level of 100 in 1 million refers to the likelihood that 100 in 1 million (1 in 10,000) people would develop cancer if they breathe air containing the same amount of the same air toxic for 70 years. This risk would be in addition to the cancer risk a person would have without being exposed to the air toxic.
- In developing air toxics regulations, EPA uses the 100-in-1 million risk level to help the Agency determine whether facilities need to reduce emissions.
- NATA estimates long-term risks – – those that may occur from breathing air containing elevated levels of air toxics continuously for many decades. It does not estimate short-term (acute) or intermediate risks. However, based on an examination of available data, EPA does not expect ethylene oxide levels in the air in these areas to be high enough to cause immediate harm to health.

Using NATA

- EPA and state, local and tribal air agencies use NATA to see if areas, specific air toxics, or types of pollution sources need to be examined further to better understand risks to public health. NATA does not estimate any person's individual risk. See the lists below for do's and don'ts of NATA use:
- **DO** use NATA results to:
  - identify pollutants and types of pollution sources of greatest concern,
  - improve understanding of air toxics-related health risks,
  - support communities in designing their own local assessments,
  - help inform community and local air toxics programs,
  - help set priorities for the collection of additional information, and
  - set priorities for improving emission inventories,

- **DON'T** use NATA results:
  - as a definitive means to pinpoint specific risk values within a census tract,
  - to compare risks at local levels (such as between neighborhoods) or between states, or
  - as the sole basis for developing risk reduction plans or regulations, to control specific sources or pollutants or to quantify benefits of reduced air toxic emissions,
    - *Here's why:* NATA is a screening assessment. Its uncertainties vary by location and by pollutant and by type of pollution source. In many cases, more detailed assessments, including emissions testing and more refined modeling, may be needed to better understand local risks.
- **DON'T** use NATA results:
  - to examine trends from one NATA year to another.
    - *Here's why*: scientific information on air toxics and health can change between assessments. Computer modeling tools and inputs to modeling can change, too, making comparison across NATA versions inaccurate.
      - The 2014 NATA includes several improvements that were not available for the previous version (2011). Those include data that allow the Agency to better estimate where emissions are occurring within a county, improved modeling accuracy for some pollutants, and updated information about the health effects some pollutants cause.

DEVELOPING NATA

- EPA collaborates extensively with, state, local and tribal air agencies to develop and quality assure the data used in NATA.
- The 2014 NATA is based on emissions for the 2014 calendar year – the most complete and up-to-date U.S. emissions data available at the time of the assessment. It also uses the latest available scientific information on air toxics and health.
- NATA uses emissions information and estimated secondary and background air toxics concentrations to estimate potential health risks.
- For the 2014 NATA, EPA assessed 180 air toxics regulated under the Clean Air Act, from the following types of emissions sources:
  - **Point sources** – These are typically industrial facilities such as coke ovens for the steel industry, large waste incinerators and refineries, but also include some smaller sources such as dry cleaners.

- **Nonpoint sources** – examples include small manufacturers and gas stations.
- **Mobile sources** – including cars, trucks and off-road vehicles like construction equipment and trains.
- **Fires** – including wildfires, prescribed wildland fires and agricultural burning,
- **Biogenics** – naturally occurring emissions from trees, plants and soil microbes.

- In addition, NATA includes estimated pollution from:
  - **Secondary formation** – This refers to pollutants that form in the air through chemical reactions; secondary air toxics often form via reactions between human-emitted and naturally occurring compounds.
  - **Background concentrations** – representing emissions from distant sources, emissions from prior years that persist in the environment, and natural source emissions other than those modeled as biogenics.
- EPA used all of these data to conduct computer modeling to create a snapshot of toxics in the air across the country in 2014.
- The Agency used that snapshot, combined with information about population and information about how different air toxics affect health, to estimate cancer risks and noncancer health effects for about 180 air toxics plus diesel particulate matter (noncancer only).

For more information

- For more information on NATA, visit https://www.epa.gov/national-air-toxics-assessment .
- For information on EPA's efforts to address emissions of ethylene oxide, visit https://www.epa.gov/ethylene-oxide .

EPA Taking Steps to Address Emissions of Ethylene Oxide

Latest National Air Toxics Assessment Shows Potential Long-Term Health Concerns in Some Areas

OVERVIEW

- **AUGUST 22, 2018 --** The U.S. Environmental Protection Agency (EPA) is taking steps to address emissions of the chemical *ethylene oxide* from some types of industrial facilities across the country.
- EPA is addressing ethylene oxide based on the results of the latest National Air Toxics Assessment (NATA), which identified the chemical as a potential concern in several areas across the country. NATA is the Agency's nationwide air toxics screening tool, designed to help EPA and state, local and tribal air agencies identify areas, pollutants or types of sources for further examination.
- The 2014 NATA uses emissions data from the latest National Emissions Inventory (2014 is the most recent data available), along with the latest scientific information on air toxics and health, to estimate long-term air toxics exposures and potential public health risk in census tracts across the United States.
- NATA estimates long-term risks – those that may occur from breathing air containing elevated levels of air toxics continuously for many decades. It does not estimate short-term (acute) or intermediate risks. However, based on an examination of available data, EPA does not expect ethylene oxide levels in the air in these areas to be high enough to cause immediate harm to health.
- Nationwide, total emissions of air toxics are declining, and air quality monitoring data show that concentrations of many toxics in the air, such as benzene, also are trending downward.
- Despite these trends, some local areas still face challenges. The 2014 NATA estimates that ethylene oxide significantly contributes to potential elevated cancer risks in some census tracts across the U.S. (less than 1 percent of the total number of tracts). These elevated risks are largely driven by an EPA risk value that was updated in late 2016.
- Ethylene oxide is a flammable, colorless gas used to make other chemicals that are used in making a range of products, including antifreeze, textiles, plastics, detergents and adhesives. Ethylene oxide also is used to sterilize equipment and plastic devices that cannot be sterilized by steam, such as medical equipment.
- EPA will work with industry, and state, local and tribal air agencies as it takes a two-pronged approach to address ethylene oxide emissions:
    - *Reviewing Clean Air Act regulations for facilities that emit ethylene oxide:*
        - EPA has begun reviewing its air toxics emissions standards for miscellaneous organic chemical manufacturing facilities, some of which emit ethylene oxide.
        - The Agency also plans to take a closer look at its rules for other types of facilities, beginning with its emissions standards for commercial sterilizers.

- *Getting additional information on ethylene oxide emissions*
  - EPA also is gathering additional information on industrial emissions of ethylene oxide, which may include data from testing at some types of facilities.
  - This information will help EPA as it evaluates opportunities to reduce ethylene oxide emissions as part of its regulations review.
  - It also will help the Agency determine whether more immediate emission reduction steps are necessary in any particular locations.

- EPA will post updates on its work to address ethylene oxide on its website at: https://www.epa.gov/ethylene-oxide

Ethylene Oxide and Risk

- Ethylene oxide in the air can come from different types of sources, including industries such as chemical manufacturers and sterilizers.

- Long-term exposure to ethylene oxide can irritate the eyes, skin, nose, throat, and lungs, and harm the brain and nervous system (causing effects such as headaches, memory loss, numbness). Studies show that breathing air containing elevated ethylene oxide levels over many years increases the risk of some types of cancers, including cancers of the white blood cells (such as non-Hodgkin's lymphoma, myeloma and lymphocytic leukemia); and breast cancer in females.

EPA's Strategy for Addressing Ethylene Oxide Emissions

Reviewing Regulations

- EPA will review Clean Air Act regulations for facilities that emit ethylene oxide to ensure that they protect the public from significant risk. The Agency has begun its review of its air toxics emissions standards for miscellaneous organic chemical manufacturing (often referred to as the "MON"). EPA last updated this rule in 2006 and is under a court order to complete review of the rule by March 2020. As part of this review, the Agency will consider risks to health and the environment, along with advances in work practices, processes or emission controls that can further reduce air toxics emissions.

- The Agency also plans to take a closer look at air toxics emissions standards for other industries that emit ethylene oxide to determine whether a review of those rules is needed. EPA will start this closer look with its air toxics emissions standards for commercial sterilizers.

Gathering Additional Information

- As part of its review of rules, EPA will gather additional information on industrial emissions of ethylene oxide, including where emissions occur, how those emissions can be controlled, and how current emission controls can be improved. The Agency also may seek information from emissions testing at facilities that emit ethylene oxide, focusing first on areas where NATA estimates elevated cancer risk.

- For ethylene oxide, facility *emissions* testing, combined with air quality modeling, can provide a more complete picture of ethylene oxide in the air in an area than air quality monitoring can

currently provide. Existing monitoring methods are not sensitive enough to detect ethylene oxide at all levels in the outdoor air. EPA is actively working to develop new techniques for measuring ethylene oxide in the outdoor air.

- In addition, data from emissions testing can be used in the review and development of air toxics regulations; data from air quality monitoring cannot. Under the Clean Air Act, air toxics regulations focus on setting limits on the amount of a pollutant an industrial facility can emit to the air.
- The information EPA obtains will help the Agency as it evaluates opportunities to reduce ethylene oxide emissions as part of its regulations review. It also will help EPA determine whether more immediate emission reduction steps are necessary in any locations.

For more information

- For more information on ethylene oxide, and for updates on EPA's efforts to address risk from this chemical in the outdoor air, visit https://www.epa.gov/ethylene-oxide .
- To learn more about NATA, and to see the 2014 NATA results, visit https://www.epa.gov/national-air-toxics-assessment .

EPA Taking Steps to Address Emissions of Ethylene Oxide
Latest National Air Toxics Assessment Shows Potential Health Concerns in Some Areas

STATEMENT

AUGUST 22, 2018 -- The U.S. Environmental Protection Agency (EPA) is taking steps to address emissions of the chemical *ethylene oxide* from some types of industrial facilities across the country.

EPA is examining these emissions based on the results of the 2014 National Air Toxics Assessment (NATA), which EPA is releasing today. NATA has identified the chemical as a potential concern in several areas across the country. NATA is the agency's nationwide air toxics screening tool, designed to help EPA and state, local and tribal air agencies identify areas, pollutants or types of sources for further examination. NATA does not estimate any person's individual risk.

Based on an examination of available data, EPA does not expect ethylene oxide levels in the air to be high enough to cause immediate harm to health. However, the 2014 NATA shows number of areas could have elevated cancer risks from long-term (many years) ethylene oxide exposure. These potential risks are largely driven by an EPA risk value that was updated in late 2016.

EPA is taking a two-pronged approach to address ethylene oxide emissions:

- First, the agency will review its air toxics regulations for facilities that emit ethylene oxide. EPA has begun reviewing its air toxics emissions standards for miscellaneous organic chemical manufacturing facilities, some of which emit ethylene oxide. The agency also plans to take a closer look at its rules for other types of facilities, beginning with its emissions standards for commercial sterilizers.
- Second, EPA is gathering additional information on industrial emissions of ethylene oxide, which may include data from testing at some types of facilities. This information will help EPA as it looks for opportunities to reduce EtO emissions as part of its regulations review. It also will help the agency determine whether more immediate emission reduction steps are necessary in any particular locations.

EPA will post updates on its work to address ethylene oxide emissions at https://www.epa.gov/ethylene-oxide

Background

The 2014 NATA estimates that EtO significantly contributes to potential elevated cancer risks in some census tracts across the U.S. (less than 1 percent of the total number of tracts).

The 2014 NATA uses emissions data from 2014 (the most recent data available), along with the latest scientific information on air toxics and health, to estimate air toxics exposures and potential public health risk in census tracts across the United States.

Ethylene oxide is used to sterilize equipment and plastic devices that can't be sterilized with steam, such as medical devices. It also is used to make other chemicals. One of those is ethylene glycol, which is used to make everyday products such as antifreeze, PVC plumbing pipe, vinyl flooring and plastics products, including recyclable plastic containers and bottles.

For more information on NATA, visit: https://www.epa.gov/national-air-toxics-assessment

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 8/20/2018 11:19:21 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: ATSDR letter Sterigenics

FYI - A couple other updates to share tmrw too

Begin forwarded message:

> **From:** "Koerber, Mike" <Koerber.Mike@epa.gov>
> **Date:** August 20, 2018 at 7:17:47 PM EDT
> **To:** "Woods, Clint" <woods.clint@epa.gov>, "Lewis, Josh" <Lewis.Josh@epa.gov>
> **Subject: Fwd: ATSDR letter Sterigenics**
>
> FYI
>
> Sent from my iPhone
>
> Begin forwarded message:
>
> > **From:** "Nam, Ed" <nam.ed@epa.gov>
> > **Date:** August 20, 2018 at 7:09:30 PM EDT
> > **To:** "Davis, Alison" <Davis.Alison@epa.gov>, "Koerber, Mike" <Koerber.Mike@epa.gov>
> > **Cc:** "Kelley, Jeff" <kelley.jeff@epa.gov>, "Siegel, Kathryn" <siegel.kathryn@epa.gov>
> > **Subject: ATSDR letter Sterigenics**
> >
> > Alison, Mike,
> >
> > I am informed that ATSDR will post their letter to their website at 9AM Central on Tuesday, Aug 21. I will send the link when I get it.
> > I believe that Jeff just sent the mock website. (still under construction) and the desk statement.
> >
> > Thanks
> > -Ed

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 8/10/2018 8:25:27 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: Sterigenics Press release
Attachments: 20180809-sterigenic_news_release-v2.1.docx; ATT00001.htm

Begin forwarded message:

From: "Koerber, Mike" <Koerber.Mike@epa.gov>
Date: August 10, 2018 at 4:24:29 PM EDT
To: "Woods, Clint" <woods.clint@epa.gov>
Cc: "Lewis, Josh" <Lewis.Josh@epa.gov>
Subject: FW: Sterigenics Press release

In case this comes up on the upcoming call….

From: Nam, Ed
Sent: Friday, August 10, 2018 3:27 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Sasser, Erika <Sasser.Erika@epa.gov>
Cc: Siegel, Kathryn <siegel.kathryn@epa.gov>; Furey, Eileen <furey.eileen@epa.gov>; Cain, Alexis <cain.alexis@epa.gov>
Subject: RE: Sterigenics Press release

With attachment

From: Nam, Ed
Sent: Friday, August 10, 2018 2:25 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Sasser, Erika <Sasser.Erika@epa.gov>
Cc: Siegel, Kathryn <siegel.kathryn@epa.gov>; Furey, Eileen <furey.eileen@epa.gov>; Cain, Alexis <cain.alexis@epa.gov>
Subject: Sterigenics Press release

Hi all,

Attached is the latest press release draft. **Deliberative Process / Ex. 5**

Deliberative Process / Ex. 5

Thanks,
-Ed

Sterigenics
A Sotera Health company

Sterigenics' Statement Upon Request to Dave Savini, CBS Chicago

February 1, 2019

We want to set the record straight with regard to the allegations raised in your email to Sterigenics dated January 30 and your subsequent conversation with Kristin Gibbs on January 31, which appear to arise from materials submitted in the litigation by attorneys representing individuals who have sued us. These plaintiffs' claims are designed for the sole purpose of moving the cases to Cook County court. In light of the ongoing litigation involving Sterigenics, we have provided a statement with our responses below.

The claims you cite are misleading and untrue and represent a clear distortion of the facts regarding Sterigenics' operations. We will vigorously defending ourselves against these allegations in court.

The residents of Willowbrook have been subjected to months of misinformation regarding Sterigenics and its safe use of ethylene oxide (EO) in the sterilization of vital medical products – including the reliance on unrealistic risk standards and flawed air sampling by the EPA.

Sterigenics Willowbrook operates in compliance with regulations and has a proven record of operating safely since it acquired the facility in 1999, including voluntary actions to consistently improve operations to outperform what the regulations require.

EO is the only method approved by the Food and Drug Administration ("FDA") to sterilize millions of critical medical devices. Without sterilization of these devices, individuals needing medical care would face life-threatening infection. By complying with and going above and beyond what the regulations require, the Sterigenics Willowbrook facility safely uses EO and provides a vital service to patients in Illinois and across the country.

In terms of the specific topics raised in your email and subsequent conversation, we offer the following responses:

- "allegations of dumping waste into the sewer system at the Willowbrook locations"
    - These allegations date back more than twenty years ago, and mischaracterize an authorized process of discharging certain waste materials into the sanitary sewer for treatment at municipal waste treatment facilities. This process was not only authorized but also permitted by, and disclosed to, the local sanitation district.
    - Notably, these waste materials were not EO – the facility treated EO emissions through its dedicated EO controls at this time. Additionally, these materials were not discharged to municipal water supplies. Furthermore, recent testing of wells in Willowbrook found no evidence of EO in the water as predicted.
    - Our control equipment produces ethylene glycol as it reduces air emissions. Ethylene glycol is commonly used in automobile antifreeze and to de-ice airplanes. The release of

2015 Spring Road Ste 650 Oak Brook, IL 60523
630.928.1700 | sterigenics.com

Sterigenics.
A Sotera Health company

ethylene glycol into the sanitary sewer for further treatment is similar to what transpires in the de-icing activity that takes place at O'Hare and other airports across the country on any given winter day. The ethylene glycol used likely flows safely into public treatment systems after application to airplanes.

- Under current DuPage County Wastewater rules, the release of ethylene glycol into the public sanitation sewer system continues to be permissible, although Sterigenics no longer uses that method of discharge. Today, ethylene glycol is safely recycled at the Sterigenics facility.

- "ethylene oxide was allowed to be vented through overhead doors and other ways other than through scrubbers."
  - This is misleading. There was no "venting" of EO to the outside as part of the facility's emissions controls. The sterilization chambers, which are where EO processing takes place, are connected to the scrubbers for emissions control. After sterilization, product is moved out of the chambers and through the facility. EO levels are monitored throughout these areas.
  - The Willowbrook facility's state-of-the-art systems safely control and contain EO. Today, less than 1/10th of 1% of the EO used in the sterilization process is released into the atmosphere – exceeding regulatory requirements and representing one of the highest control levels in the country for this industry.

- "allegations that warning monitors for workers were compromised."
  - We have found no evidence to support this claim. Sterigenics is committed to employee safety, and maintenance on monitoring systems is performed regularly to ensure the monitors function properly.
  - Sterigenics has invested significant resources to upgrade its systems and install state-of-the-art systems that allow the company's employees to safely monitor, capture and control more than 99.9% of the EO used in the sterilization process – exceeding regulatory requirements.

- "numerous other warehouses in Willowbrook and Burr Ridge used to store product that was off-gassing."
  - Products are not stored in warehouses for off-gassing. Upon removal from the sterilization chambers, products are stored in special, controlled rooms that are under negative pressure, meaning the air flows in and not out. Emissions from these rooms are also routed to emission controls. This is the FDA-approved procedure for ensuring that medical equipment remains sterile for important life-saving medical procedures.

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Worker safety, in addition to the safety of the community and patients we serve, is paramount at Sterigenics. Workers follow strict regulatory guidelines regarding the safe handling and usage of EO in the sterilization process and are provided with the necessary safety equipment based on their role and position in the facility. We are proud of our safety record at the Willowbrook facility.

We are committed to ensuring the public has the facts regarding Sterigenics and EO. The claims you have referenced – which are similar to claims made by plaintiffs who have sued Sterigenics and are currently seeking to move to the cases to Cook County court – are misleading and untrue distortions of the facts regarding Sterigenics' operations.

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630.928.1700 | sterigenics.com

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 2/8/2019 12:30:06 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: action items

Bill,

Know we discussed last night but this follow up list is pretty comprehensive. **Deliberative Process / Ex. 5**

Deliberative Process / Ex. 5

Begin forwarded message:

> **From:** "Koerber, Mike" <Koerber.Mike@epa.gov>
> **Date:** February 7, 2019 at 7:26:26 PM EST
> **To:** "Tsirigotis, Peter" <Tsirigotis.Peter@epa.gov>, "Woods, Clint" <woods.clint@epa.gov>, "Wehrum, Bill" <Wehrum.Bill@epa.gov>, "Harlow, David" <harlow.david@epa.gov>
> **Subject: Fwd: action items**
>
> Here's a summary of the action items.
>
> Sent from my iPhone
>
> Begin forwarded message:
>
> > **From:** "Siegel, Kathryn" <siegel.kathryn@epa.gov>
> > **Date:** February 7, 2019 at 7:19:19 PM EST
> > **To:** "Koerber, Mike" <Koerber.Mike@epa.gov>, "Nam, Ed" <nam.ed@epa.gov>
> > **Cc:** "Rountree, Jillian" <Rountree.Jillian@epa.gov>
> > **Subject: action items**
> >
> > Hi Mike and Ed,
> >
> > Please find a summary of action items below:

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Katie Siegel, Chief
Air Toxics and Assessment Branch
Air and Radiation Division
U.S. EPA Region 5
siegel.kathryn@epa.gov
(312) 886-3006

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 2/6/2019 2:29:25 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Sterigenics - CBS Story
Attachments: Sterigenics Response to Dave Savini CBS_02_01_19.pdf

Bill / Clint – we noted that you fielded a question yesterday about the CBS piece that ran Sunday night. Attached is a rebuttal / response that Sterigenics sent to the reporter before the story ran. Bottom line, most of the allegations of the former employee are false.

Thank you.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Gibbs, Kristin [mailto:kgibbs@soterahealth.com]
Sent: Monday, February 04, 2019 6:12 PM
To: Tom Roberts; Binninger, Declan J.
Subject: Final Statement to CBS Reporter

Here is the statement that we sent to the reporter on Friday evening.

The reporter did post this entire document on the local CBS.com site.

This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Sterigenics
A Sotera Health company

Sterigenics' Statement Upon Request to Dave Savini, CBS Chicago

February 1, 2019

We want to set the record straight with regard to the allegations raised in your email to Sterigenics dated January 30 and your subsequent conversation with Kristin Gibbs on January 31, which appear to arise from materials submitted in the litigation by attorneys representing individuals who have sued us. In light of the ongoing litigation involving Sterigenics, we have provided a statement with our responses below.

The claims you cite are misleading and untrue and represent a clear distortion of the facts regarding Sterigenics' operations. We will vigorously defend ourselves against these allegations in court.

The residents of Willowbrook have been subjected to months of misinformation regarding Sterigenics and its safe use of ethylene oxide (EO) in the sterilization of vital medical products – including the reliance on unrealistic risk standards and flawed air sampling by the EPA.

Sterigenics Willowbrook operates in compliance with regulations and has a proven record of operating safely since it acquired the facility in 1999, including voluntary actions to consistently improve operations to outperform what the regulations require.

EO is the only method approved by the Food and Drug Administration ("FDA") to sterilize millions of critical medical devices. Without sterilization of these devices, individuals needing medical care would face life-threatening infection. By complying with and going above and beyond what the regulations require, the Sterigenics Willowbrook facility safely uses EO and provides a vital service to patients in Illinois and across the country.

In terms of the specific topics raised in your email and subsequent conversation, we offer the following responses:

- "allegations of dumping waste into the sewer system at the Willowbrook locations"
    - These allegations date back more than twenty years ago, and mischaracterize an authorized process of discharging certain waste materials into the sanitary sewer for treatment at municipal waste treatment facilities. This process was authorized by, and disclosed to, the local sanitation district.
    - Notably, these waste materials were not EO – the facility treated EO emissions through its dedicated EO controls at this time. Additionally, these materials were not discharged to municipal water supplies. Furthermore, recent testing of wells in Willowbrook found no evidence of EO in the water, as predicted.
    - Our control equipment produces ethylene glycol as it reduces air emissions. Ethylene glycol is commonly used in automobile antifreeze and to de-ice airplanes. The release of

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630.928.1700 | sterigenics.com

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ethylene glycol into the sanitary sewer for further treatment is similar to what transpires in the de-icing activity that takes place at O'Hare and other airports across the country on any given winter day. The ethylene glycol used likely flows safely into public treatment systems after application to airplanes.
  - Under current DuPage County Wastewater rules, the release of ethylene glycol into the public sanitation sewer system continues to be permissible, although Sterigenics no longer uses that method of discharge. Today, ethylene glycol is safely recycled at the Sterigenics facility.

- "ethylene oxide was allowed to be vented through overhead doors and other ways other than through scrubbers."
  - This is misleading. There was no "venting" of EO to the outside as part of the facility's emissions controls. The sterilization chambers, which are where EO processing takes place, are connected to the scrubbers for emissions control. After sterilization, product is moved out of the chambers and through the facility. EO levels are monitored throughout these areas.
  - The Willowbrook facility's state-of-the-art systems safely control and contain EO. Today, less than 1/10th of 1% of the EO used in the sterilization process is released into the atmosphere – exceeding regulatory requirements and representing one of the highest control levels in the country for this industry.

- "allegations that warning monitors for workers were compromised."
  - We have found no evidence to support this claim. Sterigenics is committed to employee safety, and maintenance on monitoring systems is performed regularly to ensure the monitors function properly.
  - Sterigenics has invested significant resources to upgrade its systems and install state-of-the-art systems that allow the company's employees to safely monitor, capture and control more than 99.9% of the EO used in the sterilization process – exceeding regulatory requirements.

- "numerous other warehouses in Willowbrook and Burr Ridge used to store product that was off-gassing."
  - Products are not stored in warehouses for the purpose of off-gassing. Upon removal from the sterilization chambers, products are stored in special, controlled rooms that are under negative pressure, meaning the air flows in and not out. Emissions from these rooms are also routed to emission controls. This is the FDA-approved procedure for ensuring that medical equipment remains sterile for important life-saving medical procedures.

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Worker safety, in addition to the safety of the community and patients we serve, is paramount at Sterigenics. Workers follow strict regulatory guidelines regarding the safe handling and usage of EO in the sterilization process and are provided with the necessary safety equipment based on their role and position in the facility. We are proud of our safety record at the Willowbrook facility.

We are committed to ensuring the public has the facts regarding Sterigenics and EO. The claims you have referenced – which are similar to claims made by plaintiffs who have sued Sterigenics – are misleading and untrue distortions of the facts regarding Sterigenics' operations.

2015 Spring Road Ste 650 Oak Brook, IL 60523
630.928.1700 | sterigenics.com

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 2/5/2019 11:06:08 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Re: Willowbrook

Thanks. FYI - Ned, Jonathan Witt (rule lead on Commercial Sterilizers) and I are planning to go to Chicago in Thursday to meet with the company and, hopefully, the state to discuss emissions and control options. We'll report back to you after the meeting.

Sent from my iPhone

On Feb 5, 2019, at 5:44 PM, Wehrum, Bill <Wehrum.Bill@epa.gov> wrote:

> Mike – You did a nice job on the webinar this afternoon. I appreciate your ongoing leadership on this very tough issue.
>
> _____
> Bill Wehrum
> Assistant Administrator
> Office of Air and Radiation
> U.S. Environmental Protection Agency
> (202) 564-7404

Message

From: Personal Privacy / Ex. 6
Sent: 2/18/2019 3:08:50 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: The Sterigenics clampdown: As U.S. EPA fiddles, Illinois EPA acts - Chicago Tribune

Time's up!! Actually time was up the day Sterigenics opened here in 1984.
Or in 2017 December when Sterigenics and Rauner were informed , but not Willowbrook folks. Now is February, 2019 - What has been done since December, 2017 by Us Epa- Only 3 month every 3 days of emission readings.
It's not leaky furnaces poisoning people here. We are not that stupid to trust Sterigenics or even Us Epa.

Thank you IEPA!! Thank you Stop Sterigenics! Thank you Willowbrook village!

https://www.chicagotribune.com/news/opinion/editorials/ct-edit-sterigenics-epa-illinois-pritzker-20190217-story.html

Willowbrook resident who will be forever afraid what health wise the future brings to my family

Personal Privacy / Ex. 6

Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 2/18/2019 2:27:57 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Tsirigotis, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d19c179f3ccb4fadb48e3ae85563f132-PTSIRIGO]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Weinstock, Lewis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=df30e068efb24a24b35d63be0596ad9b-LWEINS02]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; DeLuca, Isabel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b021c30cbee4637a7c7ca683e5e044a-IDELUCA]; Bremer, Kristen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b7ad6f4a11064ef08cb03aec9dc8e892-KBREMER]
CC: Noonan, Jenny [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=19d41ff0e3054aafa47d3c33308e5b30-JNOONAN]
Subject: Fwd: The Sterigenics clampdown: As U.S. EPA fiddles, Illinois EPA acts - Chicago Tribune

FYI

Sent from my iPhone

Subject: The Sterigenics clampdown: As U.S. EPA fiddles, Illinois EPA acts - Chicago Tribune

https://www.chicagotribune.com/news/opinion/editorials/ct-edit-sterigenics-epa-illinois-pritzker-20190217-story.html

The Sterigenics clampdown: As U.S. EPA fiddles, Illinois EPA acts

Editorial Board

The U.S. Environmental Protection Agency's mission statement opens nobly: "The mission of EPA is to protect human health and the environment." To which exasperated residents of Chicago's

western suburbs would add, "If and when we at the agency get around to it."

That's because the greater the public's alarm about emissions from the Sterigenics plant in Willowbrook, the more the U.S. Environmental Protection Agency has piddled and fiddled. Left in the lurch: the 19,200 people who live within a mile of the facility.

Sterigenics uses ethylene oxide, a chemical on the federal government's list of carcinogens, to sterilize medical instruments. But as the U.S. EPA's growing pile of air quality measurements and other evidence have documented emissions issues at the facility, the feds haven't brought themselves to do much of anything. Hence the testy headline on a Tribune editorial last Friday: "Time's up, EPA. Solve the Sterigenics problem."

That very day, the EPA did act — although it wasn't the *U.S.* EPA, the agency we had hoped to roust from slumber. No, Friday's action came from Gov. J.B. Prizker's Illinois EPA. As the Tribune's Michael Hawthorne summarized: Invoking rarely used authority in state law, Illinois EPA Director John Kim prohibited Sterigenics from pumping ethylene oxide gas into massive chambers used to sterilize medical equipment, pharmaceutical drugs, spices and food. Kim's order cited a federal study that said the chemical is so toxic that even tiny concentrations routinely leaking from the company's two buildings pose a significant health risk.

The state's move doesn't resolve the essential question here: To what actual extent does the Sterigenics facility endanger its neighbors? A faster-moving U.S. EPA might by now have provided the answer. Those neighbors are understandably anxious and impatient.

The state's action Friday likely has three effects:

- People who live or work near Sterigenics have at least a temporary reprieve from emissions. Those residents are still reeling from a recent disclosure: Air tests done in November and December detected spikes in ethylene oxide even higher

than levels detected *before* Sterigenics installed pollution control equipment last summer to take care of the problem.

- Sterigenics will fight Friday's order in court. "The Illinois EPA's actions to suspend operations at the Sterigenics Willowbrook facility are indefensible," the company said in a statement. "Unilaterally preventing a business that is operating in compliance with all state permits and regulations from carrying out its vital function sets a dangerous precedent."
- Public and political pressure will intensify on the U.S. EPA to do more than continually plead for time. Are current emissions standards adequate? Why are ethylene oxide levels near Sterigenics what they are? And that essential question: To what extent does the Sterigenics facility endanger its neighbors?

Earlier this month the U.S. EPA's top air quality official, William Wehrum, said samples analyzed so far suggest that on some days air monitors in the vicinity of Sterigenics are registering other, unknown sources of ethylene oxide. He said his agency needs, yes, more time to assess the dangers, determine Sterigenics' responsibility for the emissions, and figure out how to limit them.

To Mr. Wehrum and his colleagues: Nobody wants the U.S. EPA to act rashly based on scientific supposition or political outcry rather than evidence. But your agency has known for a long time that Sterigenics had ethylene oxide issues. Be methodical, but "methodical" isn't a synonym for "sluggish." Would you accelerate your pace as urgently as if you and yours lived within a mile of this facility?

We applaud the Illinois EPA for making a provocative move that forces others to respond. Because as we wrote in frustration Friday: What's troubling about the U.S. EPA's handling of the Sterigenics case is that the agency's only action up until now — apart from testing — has been to put off deciding what to do.

Join the discussion on Twitter @Trib_Ed_Board and on Facebook.

Submit a letter, of no more than 400 words, to the editor here or email letters@chicagotribune.com.

Jeff Kelley
Director, Office of External Communications
U.S. EPA Region 5
ph: 312-353-1159

Message

From: Jennifer McConahy Personal Email / Ex. 6
Sent: 2/14/2019 2:16:10 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Members Of Congress Call For Criminal Probe Into Sterigenics Following CBS 2 Investigation – CBS Chicago

Members Of Congress Call For Criminal Probe Into Sterigenics Following CBS 2 Investigation – CBS Chicago

https://chicago.cbslocal.com/2019/02/13/sterigenics-willowbrook-criminal-probe-ethylene-oxide/

Message

From: Macnabb, Philip [PMacnabb@sterigenics.com]
Sent: 2/13/2019 11:44:24 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: Quick call

Sorry

Hit send before I was finished...

Want to give you a heads up on a strategy we are pursuing this Friday.

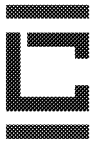
Thanks

Sent from my iPhone

Begin forwarded message:

> **From:** PMacnabb@sterigenics.com
> **Date:** February 13, 2019 at 5:41:40 PM CST
> **To:** Wehrum.Bill@epa.gov
> **Subject: Quick call**
>
> Bill
>
> Let me know if you have a few minutes tonight or tomorrow for a brief call. I want to give you a heads up on a path we are pursuing this fr
>
> Sent from my iPhone

This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.



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February 13, 2019

Via Email and Federal Express

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1271 Avenue of the Americas
New York, NY 10020
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Re: ***CBS Chicago Reporting Concerning Sterigenics U.S., LLC***

Dear Beth, Dave, and Mary:

I write on behalf of my client Sterigenics U.S., LLC. Clare Locke LLP has been retained to conduct a detailed libel review regarding CBS Chicago's reporting on the Sterigenics facility in Willowbrook, Illinois. That effort is ongoing and Sterigenics reserves all rights as it evaluates its legal options. But given that CBS Chicago continues to regularly publish stories and broadcast video reports on this subject, we wish to immediately call to your attention numerous recent statements and assertions in CBS's reporting that are false and defamatory, are highly damaging to the company's business and reputation, are adding to the significant misinformation among the general public in DuPage County and the Chicago area, and which require remedial action.

In particular, recent online stories and video reports published by CBS Chicago reporter Dave Savini on February 3, 2019[1] and February 7, 2019[2] falsely claimed that the Willowbrook Sterigenics facility has been willfully, secretly, and illegally discharging a toxic chemical into the community, and thereby created an imminent risk to public health. In an effort to support this false narrative, Mr. Savini has willfully ignored critical contextual and factual information that undercuts the story CBS Chicago clearly wants to tell — including factual information provided to him by Sterigenics ***before publication*** of the stories and video reports at issue. He has misled CBS Chicago's audience by conflating and obscuring the facts to falsely imply that Sterigenics has deliberately violated applicable laws and regulations. He has granted anonymity to unidentified "former employees" and given them a credulous forum to make unfounded allegations, without disclosing these individuals' biases, motivations, and lack of knowledge of company operations.[3] And he has uncritically republished incredible and demonstrably false allegations by biased sources — including plaintiffs' lawyers with an obvious financial motivation — to serve the purposes of his narrative.[4] See the example below:

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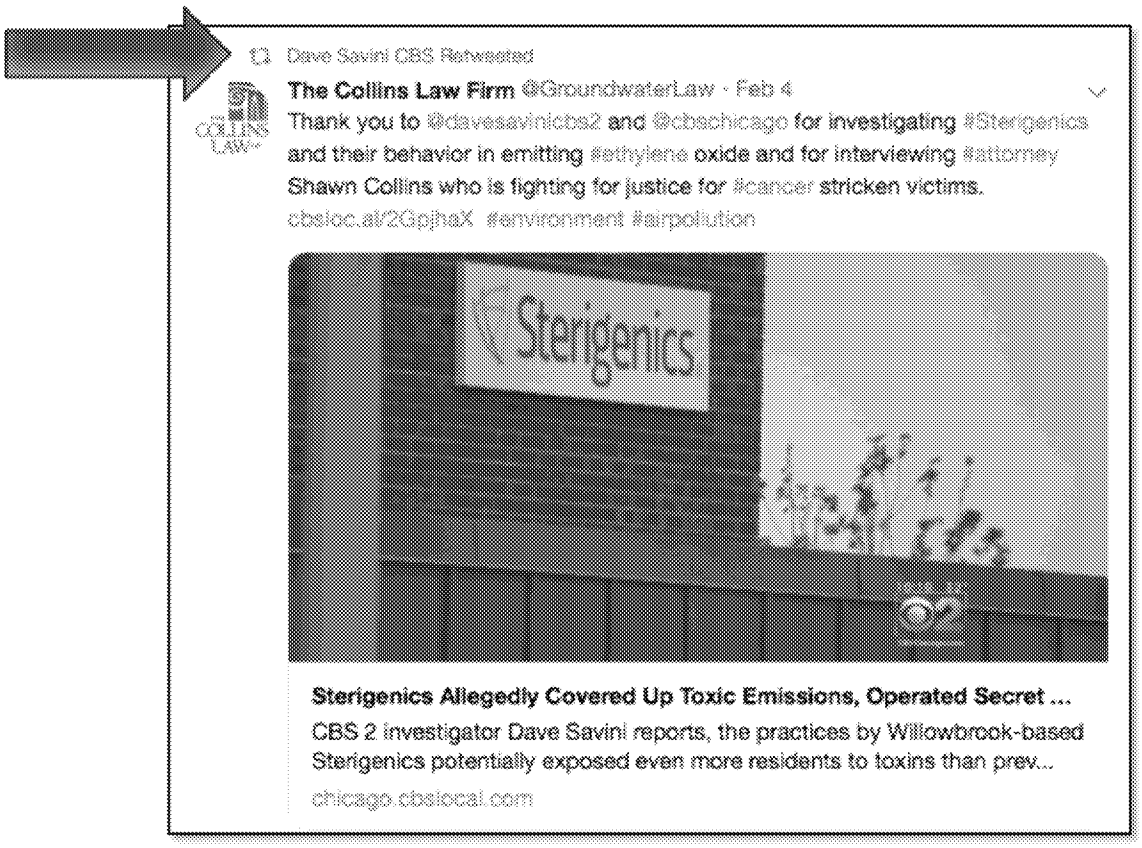
[1] Dave Savini, "Sterigenics Allegedly Covered Up Toxic Emissions, Operated Secret Plants, Former Workers Say," CBS Chicago (Feb. 3, 2019), *available at* https://chicago.cbslocal.com/2019/02/03/sterigenics-covered-up-toxic-emissions-operated-secret-plants/.

[2] Dave Savini, "Pritzker, Raoul Vow Probe Into Allegations Against Sterigenics," CBS Chicago (Feb. 7, 2019), *available at* https://chicago.cbslocal.com/2019/02/07/pritzker-raoul-vow-probe-into-allegations-against-sterigenics/.

[3] These "former employees" were presented in highly dramatized fashion in the video reports, with pixelated faces and altered voices. We have serious concerns about these former employees' motives and biases. And given that these "former" employees could not face any risk of termination or discipline for speaking to the media, it is difficult to discern any justification or need for anonymity — other than these individuals not having the conviction to put their names and faces behind the allegations they are making. This fact alone should have given CBS obvious reason to doubt their veracity.

[4] A media defendant can be liable for republishing or participating in the publication of another's false statement if it acted with a reckless disregard for whether the statement was true or false. *Solaia Tech., LLC v. Specialty Publishing Co.*, 221 Ill. 2d 558, 583 (2006); *Van Horne v. Muller*, 185 Ill.2d 299, 308 (1998); *see also St. Amant v. Thompson*, 390 U.S. 727, 732 (1968) (recklessness may be found "where there are obvious reasons to doubt the veracity of the informant or the accuracy of his reports.").



As set forth below, Mr. Savini's reports contain egregious, indefensible inaccuracies, and CBS Chicago must act immediately to correct them. We further demand that CBS Chicago's reporters, editors, producers, news directors, and attorneys take immediate steps to ensure that these errors are not repeated in any future online stories or video reports.

As an initial matter, we must note the unbalanced nature of CBS Chicago's coverage as a whole, which has repeatedly sought to portray Sterigenics as a company that has been covertly and willfully poisoning an unsuspecting community. Nothing could be further from the truth. Sterigenics is, first and foremost, a healthcare company. The services Sterigenics provides are critically important to public health because the sterilization of medical and surgical equipment is vital to protect against the spread of deadly bacteria, infections, and viruses in the healthcare setting. The ethylene oxide sterilization performed at the Willowbrook facility helps to ensure that medical devices like procedure kits, surgical trays, and syringes are free of these potentially deadly microorganisms before they ever come in contact with patients. Importantly, with respect to many critical types of medical devices, the federal Food and Drug Administration requires sterilization using ethylene oxide and, as the Environmental Protection Agency recently noted, "Ethylene oxide (EtO) is necessary to assure that some types of medical equipment are sterilized for safe use."[5]

[5] EPA in Illinois, "Sterigenics Willowbrook Facility: Frequent Questions," EPA.gov,

Moreover, and despite CBS's presentation of ethylene oxide as a dangerous chemical, it is important to note that all humans are exposed to ethylene oxide every day of their lives. There is no scientific or regulatory consensus on what threshold constitutes a hazardous ambient level of ethylene oxide. Background levels of ethylene oxide are always present both because it is naturally occurring – plants and ripening fruit, for example, produce ethylene oxide, as does the human body – and because it is produced from many man-made sources including natural gas furnaces, propane grills, automotive exhaust, cigarette smoke and agricultural applications. To date, the air sample tests from the EPA indicate ambient levels of ethylene oxide in Willowbrook and Burr Ridge residential areas that are generally consistent with the detection levels of ethylene oxide across the Chicago area, and the EPA has not concluded that ethylene oxide levels in Willowbrook are in excess of safe and acceptable exposure levels.[6] Indeed, the EPA emphasized on February 5, 2019 that the amounts of ethylene oxide being measured near Willowbrook are "extremely low levels in the atmosphere," and that there are likely unidentified sources of ethylene oxide giving rise to ambient levels in these communities – sources not associated with Sterigenics and potentially not with any industrial or commercial operations.[7] This is yet another fact that is clearly missing from CBS's reporting – and it appears intentionally so.

The use of ethylene oxide as a medical-equipment sterilization agent is sanctioned and approved by the U.S. Government, and the Willowbrook facility operates, and has consistently operated, in compliance with air permit requirements and federal, state, and local regulations. No regulatory agency has found that the Willowbrook facility's daily operations exceed permissible emissions levels for ethylene oxide. Moreover, Sterigenics has continually worked to improve and upgrade its operations, and to outperform what the regulations require, by voluntarily investing in emissions control systems and processes to ensure public safety. In fact, Sterigenics voluntarily upgraded its emissions control systems at the Willowbrook facility as recently as July 2018, and independent tests confirmed that those recent, voluntary upgrades result in the capture and control of more than 99.9 percent of the ethylene oxide used at the facility – important facts that were also excluded from CBS's reporting. With respect to ongoing testing and assessment, Sterigenics has worked cooperatively and proactively with the U.S. EPA and the Illinois EPA and it will continue to do so.

But none of this critical context has been provided to CBS Chicago's viewers and readers. Instead, both the February 3 and February 7 reports repeatedly assert, as if it were established fact, that the Willowbrook Sterigenics facility is and has been releasing amounts of ethylene oxide that are far in excess of permissible limits. And amazingly, those reports completely failed to inform viewers that the EPA has not supported these claims, and instead has acknowledged that earlier tests of the levels of ethylene oxide levels near the Willowbrook facility, and in other areas of the community, were "flawed" and "may have overstated the amount of ethylene oxide being emitted into the air." Mr. Savini and CBS Chicago were obviously aware of this, as CBS Chicago reported

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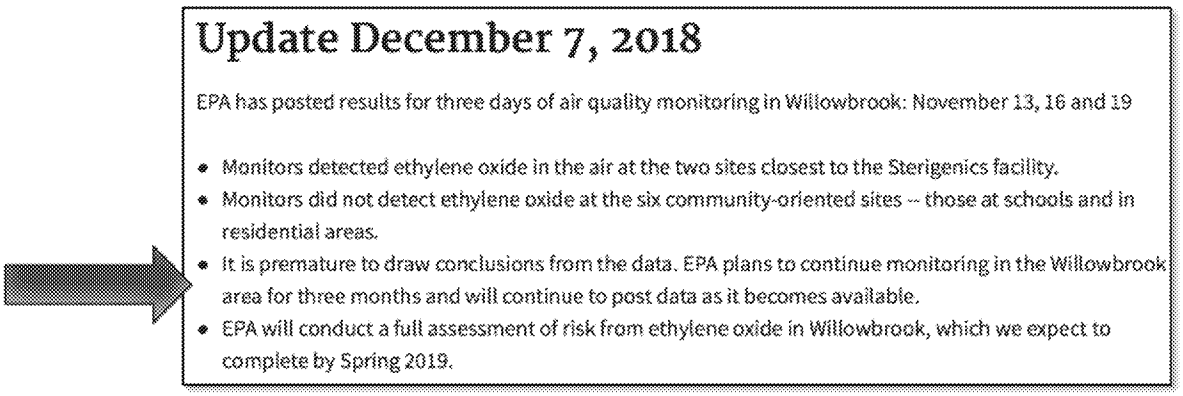
available at https://www.epa.gov/il/sterigenics-willowbrook-facility-frequent-questions#acceptable-level.

[6] *See id.*

[7] EPA, "Webinar Update on EPA Ethylene Oxide Monitoring Data for Willowbrook, Illinois," youtube.com (Feb. 5, 2019), *available at* https://www.youtube.com/watch?v=0j_O_GJbchc.

on the EPA's consequential disclaimer at the time.[8] But no mention of this was made in the February 3 and 7 reports. Moreover, as CBS Chicago also knows, the EPA has stated in official correspondence to the Governor of Illinois that "air concentrations of ethylene oxide are not high enough to cause immediate harm to health for the people in and around Willowbrook,"[9] and the EPA has also consistently and repeatedly admonished that while testing and assessment are ongoing, "***[i]t remains premature to draw conclusions about long-term health risks from the data.***"[10]



Update December 7, 2018

EPA has posted results for three days of air quality monitoring in Willowbrook: November 13, 16 and 19

- Monitors detected ethylene oxide in the air at the two sites closest to the Sterigenics facility.
- Monitors did not detect ethylene oxide at the six community-oriented sites -- those at schools and in residential areas.
- It is premature to draw conclusions from the data. EPA plans to continue monitoring in the Willowbrook area for three months and will continue to post data as it becomes available.
- EPA will conduct a full assessment of risk from ethylene oxide in Willowbrook, which we expect to complete by Spring 2019.

In other words, the federal agency with both particular expertise ***and*** regulatory oversight authority has cautioned against drawing the precise conclusions that CBS Chicago presented to its audience as established fact.[11]

Another fundamentally false assertion in Mr. Savini's stories has been the repeated conflation of ethylene oxide gas with ***ethylene glycol,*** a completely different compound that is a ***liquid*** byproduct of a sterilization process utilizing ethylene oxide. Mr. Savini, in both the February 3 and February 7 broadcasts, ominously referred to ethylene glycol and repeatedly asserted that "[f]ormer Sterigenics employees allege the company ordered workers to dump toxic chemicals directly into the public sewer system" — plainly insinuating to viewers that such an act would have

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[8] Charlie De Mar, "EPA Announce Sterigenics Tests on Ethylene Oxide May Be Misleading," CBS Chicago (Nov. 21, 2018), *available at* https://chicago.cbslocal.com/2018/11/21/epa-announces-sterigenics-tests-may-be-misleading/.

[9] Sept. 27, 2018 Ltr. Environmental Protection Agency Assistant Administrator W. Wehrum to Governor B. Rauner, *available at* https://www.epa.gov/sites/production/files/2018-10/documents/signed_response_to_hon_bruce_rauner.pdf.

[10] United States Environmental Protection Agency, "EPA in Illinois: Sterigenics Willowbrook Facility – Latest Update," EPA.gov (updated Feb. 8, 2019) *available at* https://www.epa.gov/il/sterigenics-willowbrook-facility-latest-update#20181207. EPA included the same cautionary disclaimer in its February 5, 2019 update.

[11] *See Babb v. Minder*, 806 F.2d 749, 755-56 (7th Cir. 1986) (actual malice may be shown where a publisher "was aware of the seriousness of the allegations" and "their great potential for harm" but lacked an adequate factual basis for making them).

been both illegal and seriously hazardous to public health.[12] But as the company informed Mr. Savini in writing on February 1, 2019, it is ***permissible and legal*** under DuPage County Wastewater rules to discharge ethylene glycol liquid into the public sanitation sewer system, and it is not considered a health risk to do so. In other words, Mr. Savini knowingly deceived CBS Chicago viewers by presenting an authorized activity as improper, illegal, and imminently hazardous to health. On top of this, Mr. Savini's reports also conspicuously failed to note that even though it would be permissible to do so, it is not the practice of the Willowbrook facility to discharge ethylene glycol into the sanitation sewer system.[13] Instead, it is safely recycled and sold to a third party for future use in other applications.

But worse still, Mr. Savini also conflated ethylene glycol and ethylene oxide in a way that falsely suggested to readers and viewers that ***both*** chemicals were released by Sterigenics into the public sewer system. For example, the February 3, 2019 print story states: "Former workers, who do not want to be identified, accused the company of improperly dumping ethylene oxide and ethylene glycol. One former Sterigenics worker said the chemical would be washed directly into the factory drains." During the February 7, 2019 video broadcast Mr. Savini stated, "[f]ormer workers also told CBS 2 bosses ordered certain chemicals dumped right into the environment."[14] At the same time, the broadcast showed a graphic with the words "ETHYLENE OXIDE" and "ETHYLENE GLYCOL" over a background video of liquid pouring from a jar. This was immediately followed by an "anonymous" worker – whose face was pixelated – describing chemicals being hosed into drainage pits, and Mr. Savini summarizing, "that was just washed also, into the public sewer system." By willfully conflating these two chemicals, the broadcasts obviously suggested to viewers that Sterigenics was "dumping" not just ethylene glycol liquid, but also ***ethylene oxide gas*** directly into the public sewage and water system. Mr. Savini knew this was both untrue and an impossibility – given that, again, ethylene oxide is a ***gas*** – but he nevertheless deliberately misled viewers in an effort to cause alarm and to make Sterigenics appear as nefarious as possible.[15] These false claims were also repeated in a February 5, 2019 story by CBS Chicago reporter Charlie De Mar, which similarly claimed that "the company instructed workers to improperly dump toxic chemicals, including ethylene oxide." This was again immediately followed by the physically impossible assertions that

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[12] *Gibson v. Philip Morris, Inc.*, 292 Ill. App. 3d 267, 274 (1997) (a statement can be found "false by implication" if it is "written in such a manner as to impute" to plaintiff improper conduct).

[13] Sterigenics today does not handle ethylene glycol in this manner, and the company is not aware of any instances of ethylene glycol liquid being discharged into the public sanitation sewer system since it purchased the Willowbrook facility in 1999. But even if the facility had discharged ethylene glycol into the sewer system, there would have been nothing illegal or improper about doing so.

[14] Even as to ethylene glycol, this is a grossly misleading statement. Any ethylene glycol discharged into a sewer sanitation drain would not be "dumped right into the environment," it would be discharged into a wastewater system and routed to a water treatment plant.

[15] *See Zerangue v. TSP Newspapers, Inc.*, 814 F.2d 1066, 1071 (5th Cir. 1987) ("[C]ourts have upheld findings of actual malice when a defendant failed to investigate a story weakened by inherent improbability, internal inconsistency, or apparently reliable contradictory information," and where the reporter "was aware of facts contradicting [his] story").

ethylene oxide gas was "squeegee[d] right into the drainage pits" and "washed into the public sewer system."[16]

Finally, both the February 3 and February 7 reports repeatedly refer to supposed "secret warehouses" in Willowbrook and Burr Ridge and claim that Sterigenics improperly used these facilities for "off-gassing" of products treated with ethylene oxide. This is simply false. As Mr. Savini was told on February 1, Sterigenics does not store products in warehouses for the purpose of off-gassing. Off-gassing takes place in dedicated locations at the Willowbrook facility that are specially designed for this purpose. Neither the February 3 or February 7 reports provide any factual basis for these false claims. In fact, the February 3 report actually acknowledges that the EPA has no records of any off-gassing occurring at these other locations, but it then proceeds to bizarrely and counterfactually paint this complete absence of evidence as affirmative evidence of some kind of illicit cover up by Sterigenics. To the extent CBS Chicago is relying on "anonymous" sources for these claims, these sources are providing false information. CBS Chicago should know that it will not be able to hide behind anonymous sources to assert a lack of negligence or malice in its reporting, and if necessary, we will seek discovery of not only what information these sources provided, but whether CBS Chicago had reason to question the veracity of that information.[17]

The false statements in CBS Chicago's reporting on Sterigenics have caused, and continue to cause, enormous damage to the company. Foreseeably, these false claims have been widely repeated and republished on social media and by other media outlets. They have also, predictably, caused much consternation among lawmakers and public officials — to the point that CBS Chicago is now, in a sort of perverse feedback loop, triumphantly reporting on the fruits of its own false reporting:

After CBS 2 Investigators Report, Senator Durbin Calls For Investigation Into Sterigenics
CBS 2 Chicago
By Dave Savini
12 February 2019

VIDEO LINK

A CBS 2 Investigators report on Sterigenics prompts a call for action on the floor of the U.S. Senate.

"Ex-employees of Sterigenics came forward and reported to this television station that ethylene oxide was often released directly into the air surrounding the plant through open doors and vents," said Illinois U.S Senator Dick Durbin.

Senator Durbin cited a report by CBS 2 Investigator Dave Savini demanding changes at the suburban medical equipment sterilization company. Tests at the Willowbrook plant found levels of a cancer-causing chemical 350 times higher than what the EPA calls an "acceptable risk."

Calling this an urgent health crisis, Senator Durbin and Senator Tammy Duckworth on Tuesday demanded the EPA find a third-party environmental engineering firm to identify a way to reduce emissions.

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[16] Charlie De Mar, "EPA Test Results Show Sterigenics Emitting High Levels of Cancer-Causing Chemical," CBS Chicago (Feb. 5, 2019), *available at* https://chicago.cbslocal.com/2019/02/05/sterigenics-willowbrook-ehtylene-oxide-epa/.

[17] *See Desai v. Hersh*, 954 F.2d 1408, 1412 (7th Cir. 1992) (noting the "general rule" that in a defamation case, "ordinarily the reporters privilege must give way to disclosure").

Necessary Steps Moving Forward

Journalistic standards require that when a reporter gets the facts wrong, he or she must promptly and publicly issue a correction. Mr. Savini and CBS Chicago must immediately comply with their moral and ethical responsibility to do so. In particular, CBS Chicago must issue public corrections to the February 3 and 7 video reports and stories that inform viewers that: (1) the EPA's testing and assessment in Willowbrook is ongoing, EPA has reached no definitive conclusions, and EPA has cautioned that "It remains premature to draw conclusions about long-term health risks from the data"; (2) ethylene glycol is an entirely separate compound from ethylene oxide, it is not subject to the same handling and emissions rules as ethylene oxide, and it is not illegal or improper to discharge ethylene glycol liquid into sewer sanitation systems; (3) CBS Chicago's insinuations that Sterigenics somehow poured ethylene oxide gas into the public sewer system were false;[18] and (4) CBS Chicago is not aware of any evidence supporting the claim that "off-gassing" occurred at any locations other than the Willowbrook facility. In addition, we demand that CBS Chicago and CBS Local Digital Media's reporters, editors, producers, news directors, and lawyers take immediate steps to ensure that these false statements are not repeated, and that ongoing and future coverage of these issues is fair, balanced, and, most importantly, factually accurate.

Until this matter is resolved, we must insist that CBS Chicago and CBS Local Digital Media direct Mr. Savini, Mr. De Mar, their editors, producers, any other individuals at who participated in the reporting, editing, or publishing of the Sterigenics coverage, and who are participating in the reporting and/or editing of any forthcoming coverage, to preserve and retain all documents, data, and electronically stored information relating in any way to the Willowbrook facility and/or Sterigenics.[19] For the avoidance of doubt, this document hold request includes, without limitation, the ongoing obligation to preserve and retain: (i) all communications with sources and/or potential sources, including phone records; (ii) all communications with all persons who performed any work related to these stories; (iii) all communications between reporters, editors, fact-checkers, producers, and attorneys involved in these stories; (iv) all reporters' and editors' notes regarding these stories, and all drafts, versions, and scripts of these stories; and (v) the complete web browser histories and web search histories of all those involved in these stories. These items should be preserved regardless of the medium, format, or device on which they are hosted, and regardless of whether they appear in documents, drafts, notes, emails, text messages, voicemail messages, social media posts, audio and video recordings, or in any other form.

Please confirm receipt of this letter and that CBS Chicago and CBS Local Digital Media intend to adhere to our request to retain documents as set forth above. I look forward to your prompt response.

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[18] As noted, the false claims regarding dumping of ethylene oxide gas into the sewer system were also included in Mr. De Mar's February 5, 2019 story, and therefore that story must be corrected as well. *See* note 14, *supra*.

[19] This includes CBS's anonymous sources — unless, of course, CBS intends to inform us of their identities so that we may send them a preservation notice directly.

Sincerely,

Elizabeth M. Locke, P.C.

February 14, 2019

VIA ELECTRONIC DELIVERY

Honorable Richard J. Durbin
711 Hart Senate Office Building
United States Senate
Washington, D.C. 20510

Honorable Tammy Duckworth
524 Hart Senate Office Building
United State Senate
Washington, DC 20510

Honorable Sean Casten
429 Cannon House Office Building
United States House of Representatives
Washington, D.C. 20515

Honorable Bill Foster
2366 Rayburn House Office Building
United States House of Representatives
Washington, D.C. 20515

Honorable Daniel W. Lipinski
2346 Rayburn House Office Building
United States House of Representatives
Washington, D.C. 20515

Honorable Bradley S. Schneider
1432 Longworth House Office Building
United States House of Representatives
Washington, D.C. 20515

Senators and Representatives:

First, we would like to thank each of you again for taking the time to meet with us on January 29, 2019 and allowing us the opportunity to describe what Sterigenics does and how we safely operate our Willowbrook plant, explain how critical our plant is to the healthcare system, and answer the many questions each of you had.

We received your February 8, 2019 letter inquiring about the CBS Chicago "Investigative Report" concerning our Willowbrook facility and welcome the opportunity to respond to your questions. The CBS "Investigative Report" is filled with misleading and incorrect statements and represents, at best, a misinterpretation, if not an outright distortion of basic facts. We appreciate this opportunity to set the record straight.

Sterigenics.
A Sotera Health company

The residents of Willowbrook have been subjected to months of misinformation regarding Sterigenics and its safe use of ethylene oxide ("EO"). The Willowbrook facility operates in compliance with regulations and has a proven record of operating safely, including voluntary actions to consistently improve performance beyond what the regulations require.

The specific questions in the February 8, 2019 letter are set forth below along with the Company's answers.

1. Do you believe there is ever a situation in which it would be appropriate to release biologically significant amounts of EtO directly into the atmosphere without going through the proper pollution control equipment? If yes, please explain. Please provide us with copies of all documents that you rely on to support this position.

Answer:

Sterigenics does not believe it is appropriate to circumvent or bypass pollution control equipment at its Willowbrook facility, and the Company vehemently rejects any suggestion that it has done so or would do so. The Sterigenics Willowbrook facility is committed to controlling EO emissions safely and in compliance with applicable regulatory permits.

The facility has operated pursuant to and in compliance with operating permits issued under the federal Clean Air Act by the Illinois EPA and its Clean Air Act Permit Program ("CAAPP") since the program's inception. Sterigenics takes its regulatory obligations very seriously, and it has not only complied with the requirements of its operating permits, but has gone beyond those requirements by installing emissions control equipment and systems that exceed the USEPA's and Illinois EPA's regulatory standards.

Today, we monitor, capture and control more than 99.9% of the EO used in the sterilization process – ***exceeding regulatory requirements and representing one of the highest control levels in the country for this industry***. The only EO that is released directly to the atmosphere is the remaining .1%, which reflects post-control stack emissions and fugitive emissions estimates.

The CAAPP permit under which Sterigenics operates regulates emissions of ethylene oxide through application of the federal Clean Air Act's National Emissions Standards for Hazardous Air Pollutants ("NESHAP") program. *See* 40 C.F.R. § 63.368 (Ethylene Oxide Emissions Standards for Sterilization Facilities). Neither the USEPA nor the Illinois EPA has promulgated regulations that enforce specific maximum concentrations or levels for EO emissions in the atmosphere. Instead, the NESHAP requires the use and operation of emissions control systems that reduce emissions from the sterilization chambers and aeration rooms to an exacting level of efficiency – elimination of 99% of the EO emissions.[1]

On January 30, 2006, the Illinois EPA issued modified CAAPP Permit No. 95120085 to Sterigenics for the Willowbrook facility and on June 8, 2015, the Illinois EPA renewed CAAPP permit No. 95120085. This permit includes the NESHAP for EO emissions from sterilization facilities. Neither the Sterigenics permit nor the NESHAP requires facilities to control EO emissions from backvent valves. Nonetheless, in June 2018,

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[1] The NESHAP also permits an alternative limit for aeration rooms, instead of 99%. Prior testing at Willowbrook has demonstrated compliance with both alternatives.

Sterigenics.
A Sotera Health company

Sterigenics voluntarily submitted a construction permit application to connect the backvents to the emission control equipment and thereby further reduce the emissions from the Willowbrook facility. On June 26, 2018, the Illinois EPA issued Permit No. 18060020 to duct the emissions of EO from the backvent valves to existing pollution control devices. Once these backvent valves became ducted, they too were subject to NESHAP's 99% control requirement.

We are emitting far below the levels allowed in the CAAPP permit and the NESHAP at our Willowbrook facility. In addition, Sterigenics reports 100% of its annual estimated emissions of EO in regulatory submissions, accounting for releases through the emission control system, as well as any fugitive emissions that are not captured by that system. Both types of emissions are expressly contemplated by and allowed pursuant to the operating permits issued by the Illinois EPA. The permits issued to Sterigenics by the Illinois EPA are available on its website, at the link here. The regulatory reports regarding these emissions are publicly available here and at the bottom of the page here.

During its webinar on February 5, 2019 to discuss recent air sample results in Willowbrook, the USEPA stated that "it remains premature to draw conclusions about long-term health risks" from EO emissions from the Sterigenics facility. Further, the EPA indicated that amounts of EO recently being measured are "extremely low levels in the atmosphere...part per billion and part per trillion numbers and it doesn't take very much of this material or any material to cause those kinds of levels in the air."

Finally, while USEPA's work continues, its most recent sampling shows average EO levels in residential areas in Willowbrook that are in line with general background levels of EO across the Chicago area and other parts of the country.

2. Do you believe there is ever a situation in which it would be appropriate to dump ethylene glycol into drainage facilities instead of its proper collection process? If yes, please explain.

Answer:

Sterigenics believes that disposal of ethylene glycol always should be done properly and has not illegally "dumped" ethylene glycol into drainage facilities or public sewer systems in violation of any applicable regulations and any accusations to the contrary are simply false.

According to current DuPage County wastewater rules, it is permissible to discharge treated ethylene glycol to the sanitary sewer system so long as the discharge is coordinated with the local sewer district and the glycol is within a certain pH range. *See* DuPage County Code, Chapter 36. These regulations have been in effect for decades. Prior to the purchase of the Willowbrook facility in 1999 by Sterigenics' predecessor, it is our understanding that ethylene glycol periodically was disposed of through the sanitary sewer system in a manner consistent with these regulations. We understand that the local sanitary sewer district was notified of these authorized discharges, and the Willowbrook facility complied with local ordinances regarding them. Currently, Sterigenics has chosen a recycling option whereby the ethylene glycol is sold to a manufacturer as a byproduct. This recycling avoids the need to burden the sewer treatment plant with additional waste.

Sterigenics did experience an accidental release of ethylene glycol in 2013 and one very minor one in late 2018. The 2013 release was cleaned up and the Company obtained a No Further Remediation letter for all affected property. The same process is ongoing now for the minor 2018 release. Finally, we note that recent testing by the Illinois EPA in late 2018 found no evidence of EO or ethylene glycol in local water wells, confirming that the Willowbrook facility has had no impact on local well water.

Sterigenics.
A Sotera Health company

3. Do you maintain a record of monitor alarm occurrences from EtO at the facility, and does an EtO alarm alert have to be reported to federal or state authorities? How many times have these monitors been triggered since 1993? If so, provide us with copies of these records from 1993 to present day.

a. **Does an EtO alarm alert have to be reported to federal or state authorities? If so, please provide us with copies of all documents submitted in connection with those reports from 1993 to present day.**

b. **How many times have these monitors been triggered since 1993? Please provide us with a complete list of the exact dates on which the monitors were triggered.**

Answer:

Our voluntary monitoring systems were put into place to provide real-time alerts to our employees of EO levels. This question implies that alarms being "triggered" is an indication of problematic EO exposure issues inside the Willowbrook facility, and that is not necessarily correct.

We have in effect three internal monitoring systems, all of which are designed for employee safety and monitor air within the facility. The three systems are a Gas Chromatography ("GC") monitoring system, a Lower Explosive Level ("LEL") monitoring system, and a personal monitoring (commonly referred to as a "badge") system. The only regulatorily-required system is the personal monitoring system, which is required by OSHA. Our GC and LEL monitoring programs are not required by any regulatory authority, exceed OSHA requirements, and are part of a system that our company voluntarily installed for protection of employee safety inside our building. Accordingly, we are not required to report to any state or federal authorities on these voluntary monitoring systems.

The GC system monitors levels of EO concentrations inside the Willowbrook facility. The system cycles through different monitoring locations (known as "ports") continuously at all hours of every day in order to assist with employee safety. The system is connected to a set of stacked lights (green, yellow, and red) and audible sounds that alert employees to the EO levels in the areas of the corresponding port. Employees use the system to determine when to don personal protective equipment and to inform responsive actions.

The LEL system is designed to measure EO concentrations continuously and to detect significant changes in EO concentration in different areas of the facility that would be an indication of a potential leak of EO. The LEL sensors measure, in percentage terms, the EO concentration compared to the lower flammable or explosive limit of EO. The LEL system conveys information using the same stacked lights and audible alert system that the GC system is connected to.

In 2018, a facility evacuation in Willowbrook 1 or Willowbrook 2 occurred seven times because of high LEL sensor readings. In each case, these were determined to be false alerts caused by faulty LEL sensors. As with any sensor, there can be false readings due to "drift" within the electronic sensors, faulty sensors or circuit boards, or moisture on the sensor. Sterigenics nevertheless requires that its safety procedures are followed until a reading is demonstrated to be false. Again, safety is Sterigenics' paramount concern.

We have 56 total GC and LEL sensors in our Willowbrook 1 facility, and 31 total GC and LEL sensors in our Willowbrook 2 facility. These sensors provide complete facility coverage as well as redundancy.

4. **What is the protocol for employees and facility management when an EtO alarm sounds, whether it be from a personal exposure alarm or a facility-wide alarm? Please provide us with copies of all documents memorializing or interpreting this protocol.**

Answer:

As noted above, our GC and LEL monitoring systems communicate to employees the levels of EO in a given indoor area through colored lights and audible alarms, as well as through panel displays that provide numerical EO readings. Employees are extensively trained on the steps to take in response to these readings. If the EO reading in a particular indoor location is below 1 ppm (the OSHA 8-hour permissible exposure limit ("PEL")), the area monitoring system will display a green light, indicating that it is safe for workers to be in the area. Employees are trained to evaluate whether to use personal protective equipment if EO levels equal or exceed 1 ppm, and are trained to don personal protective equipment if EO levels equal or exceed 3 ppm. Regarding the LEL system, if the LEL sensor reads above 25% of the LEL then the system displays a red flashing light, a constant audible alarm sounds throughout the facility, and a plant evacuation is required.

We are uncertain as to what your question about "personal exposure alarms" is referring. We are unaware of any such alarms. The GC and LEL sensors are stationary, whereas personal monitoring badges are designed to be worn by an individual employee throughout the plant and record the amount of EO to which the employee may be exposed. Personal monitoring is performed by attaching a badge (which is a sampling device) to the employee's clothing to test airborne EO concentrations regardless of where the employee moves in the workplace. Personal monitoring is done on a quarterly basis. Samples are collected for 15 minutes to test short-term exposure and for an 8-hour period to test for average exposures over a time-weighted 8-hour period as required by OSHA. These samples are sent to a third-party laboratory for analysis. *See, e.g.,* U.S. Department of Labor, *Ethylene Oxide (EtO): Understanding OSHA's Exposure Monitoring Requirements*, https://www.osha.gov/Publications/ethylene_oxide.html.

The GC, LEL, and personal monitoring systems all exist to assist our employees in avoiding elevated concentrations of EO and all measure EO levels within the facility, not of emissions outside the facility. We take the safety of our employees very seriously. We would not tolerate any manipulation of these systems in a manner inconsistent with our commitment to employee safety, and we are not aware of any such instances.

5. **Please provide us with a detailed description of past incidents at the Sterigenics Willowbrook facility where Sterigenics bypassed pollution control equipment and released EtO directly into the atmosphere.**

Answer:

All of the EO emissions from the sterilization chambers, backvents and aeration rooms at the Willowbrook facilities are sent directly to emission control devices. ***Sterigenics does not allow these devices to be bypassed***.

The facility experienced a malfunction of its pollution control systems, which resulted in an uncontrolled release of a small volume of EO, on October 7, 2013. This 12-pound release was reported to the Illinois EPA, and the Company paid a fine and settled the claim by the State of Illinois. There are detailed requirements under federal law for reporting releases of EO releases to federal, state and local authorities, and Sterigenics complies with these laws. ***With the exception of this one incident, Sterigenics has not had a reportable release of EO from its Willowbrook facility since Sterigenics' predecessor purchased the facility in 1999***.

6. **Please provide us with a detailed explanation on why the alleged actions referenced above in (5) are false or why such actions occurred but were appropriate.**

Answer:

See the response to 5 above.

7. **Please provide us with all documents relating to incidents involving the direct release of EtO into the atmosphere at the Sterigenics Willowbrook facility.**

Answer:

We are unsure what is meant by "direct release" as used in this question. Sterigenics' operating permits allow the release into the atmosphere of a certain small percentage of the EO used annually in sterilization processes. These permitted emissions occur after the EO is captured and processed by the emissions control equipment in accordance with the NESHAP standards and Sterigenics' operating permits, and also through small permitted amounts of fugitive emissions. Both types of emissions are allowed pursuant to the operating permits issued by the Illinois EPA. Permits are available on Illinois EPA's website, available here. Regulatory submissions regarding these emissions are also publicly available at the links provided above in response to Question 1. ***As noted above, with the one exception of the equipment malfunction in 2013, Sterigenics has not experienced an exceedance of any EO emissions limits***. Documents regarding the 2013 incident are available here.

* * *

As the only method approved by the Food and Drug Administration ("FDA") to sterilize millions of critical medical devices, EO sterilization protects individuals needing medical care from life-threatening infection. On an average day, the Willowbrook facility sterilizes 1,000 cardiac devices used in heart surgery, 1,000 knee implants, 1,500 surgical procedure kits, 16,000 catheters, 11,000 syringes for injections used in radiology diagnosis, and thousands of diabetes monitoring and care kits, renal care products, neurosurgical devices, and respiratory care products.

There is no viable alternative for sterilizing these devices. Indeed, for numerous important FDA-approved medical devices, EO sterilization is the only method approved by FDA for ensuring sterility. What many do not understand is that an FDA-required sterilization method for these devices cannot be simply shifted to another technology or another facility. To ensure consistent, reliable removal of pathogens, sterilization processes are validated to a specific technology and, often times, a particular chamber at a specific facility. Accordingly, if the Willowbrook facility were not in operation, ***tens of thousands of patients each day*** would be forced to go without the medical procedures they need. By complying with and going above and beyond what the regulations require, the Willowbrook facility safely uses EO and provides a vital service to patients in Illinois and across the country.

Again, thank you for the opportunity to respond to the gross factual distortions and misleading claims in the "CBS Investigative Report." We would welcome the opportunity to receive you or your staff for a tour of our facility and further discuss any of the responses in this letter. We would be happy to coordinate a time at your convenience.

Sincerely,

Philip Macnabb
President, Sterigenics U.S., LLC

Message

From: Jennifer McConahy Personal Email / Ex. 6
Sent: 2/14/2019 10:37:54 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Time's up, EPA. Solve the Sterigenics problem. - Chicago Tribune

Time's up, EPA. Solve the Sterigenics problem. - Chicago Tribune

https://www.chicagotribune.com/news/opinion/editorials/ct-edit-sterigenics-epa-air-pollution-cancer-20190214-story.html

Message

From: Christian, Megan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=64A0F5E0E9D94271B23CAD28DB653851-LIZOTTE, ME]
on behalf of Orme-Zavaleta, Jennifer [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3C5A111DC377411595E5B24B5D96146B-ORME-ZAVALETA, JENNIFER]
Sent: 2/14/2019 9:09:53 PM
To: Weekly Report Group [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0f8a89464c5e435c87b7375ffe506c1a-Weekly Repo]
CC: Hubbard, Carolyn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2a93ce3245494318b109e87f7d826284-Hubbard, Carolyn]; Blackburn, Elizabeth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a080eb90549a453aaa6a357f5257c0b7-Blackburn, Elizabeth]; Rodan, Bruce [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Rodan, Bruce]; Radzikowski, Mary Ellen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2ac0a54e43bb4ac08276b57c5563c725-Radzikowski, Mary Ellen]; Robbins, Chris [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=958b4b78eb42457eacf53514e428efd6-Robbins, Chris]; Breen, Barry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1b44bce1a71e4a95acaf82f2fbc858b0-BBREEN]; Dunham, Sarah [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a9444681441e4521ad92ae7d42919223-SDUNHAM]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Walker, Mary [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Walker, Mary S.]; Forsgren, Lee [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a055d7329d5b470fbaa9920ce1b68a7d-Forsgren, D]; Nishida, Jane [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=65e465e683c54e1b825f1bad32dcb099-Nishida, Jane]; Servidio, Cosmo [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f11f91d53e9a4cdaa8281be07e9034aa-Servidio, C]; Benevento, Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=93dba0f4f0fc41c091499009a2676f89-Benevento,]; Gulliford, Jim [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a3aa23ac3a36426495575d5dfd5a37c9-Gulliford,]; Lopez, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b7b64b3b2f984708840a5f342309d460-Lopez, Pete]; Wagner, Kenneth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=048236ab99bc4d5ea16c139b1b67719c-Wagner, Ken]; Darwin, Henry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7ae8e9d24eeb4132b25982e358efbd9d-Darwin, Hen]; Bodine, Susan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8c2cc6086fcc44c3be6b5d32b262d983-Bodine, Sus]; Ross, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e062a18f48f1455295deebfb9bf7a30d-Ross, David]; Stepp, Cathy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=befdafc0fa1a425eae232f60ad9bda1d-Stepp, Cath]; Idsal, Anne [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b1beca8121fb47a08e82b6bf2247a79b-Idsal, Anne]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Sauerhage, Maggie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b13c7152d704546b40a91220914d3cc-Sauerhage,]; Dunlap, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=591eb15a268249dda0c05a7451f765c3-Dunlap, Dav]
Subject: ORD Weekly Report February 14
Attachments: ORD weekly Update February 14.docx

Administrator,

I'm pleased to share that we received the 2018 report for EPA for Feds Feeds Families, and EPA contributed the most for a small agency. It was a successful campaign and cross-agency effort. Today, we welcomed the European Union delegation to our labs in RTP, NC, and supported the rollout of the PFAS management plan.

Hot issues

Deliberative Process / Ex. 5

Administrator,

I'm pleased to share that we received the 2018 report for EPA for Feds feeds families, and EPA contributed the most for a small agency. It was a successful campaign and cross-agency effort. Today we are looking forward to welcoming the European Union delegation to our labs in RTP, NC, and supporting the rollout of the PFAS management plan.

Hot issues

Deliberative Process / Ex. 5

Message

From: Greaves, Fielding [FGreaves@AdvaMed.org]
Sent: 2/14/2019 5:55:37 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Crist, Greg [GCrist@AdvaMed.org]
Subject: Time to talk about Willowbrook?

Importance: High

Hi William,

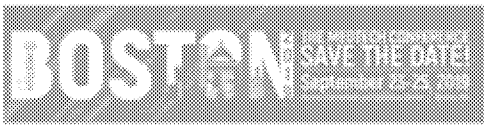
Do you have a few minutes to connect today about the situation in Willowbrook? I just want to touch base and offer myself as a resource and establish contact so if we need to communicate in this process we have the line open already.

I have a fair amount of time today - shoot me a call if you can or let me know if you can connect for 5 minutes. My cell is 9168382264

Thank you

Fielding Greaves

FIELDING GREAVES
Director | State Government & Regional Affairs (West)
Advanced Medical Technology Association (AdvaMed)
Mobile: 916-838-2264 | Office: 202-434-7265
advamed.org | lifechanginginnovation.org



Message

From: Jennifer McConahy Personal Email / Ex. 6
Sent: 2/14/2019 2:16:49 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Attachments: 19.02.13 - Wheeler Sterigenics.pdf

Message

From: Macnabb, Philip [PMacnabb@sterigenics.com]
Sent: 1/28/2019 5:12:30 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Re: [EXTERNAL] RE: Call

Sure

I will call at 5:30

Sent from my iPhone

> On Jan 28, 2019, at 12:08 PM, Wehrum, Bill <Wehrum.Bill@epa.gov> wrote:
>
> CAUTION: This email originated from outside of the organization. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.
>
> I will be up on the Hill with Wheeler at that time. Are you available at 5:30? If so, please call 202 424 0654. Thanks.
>
> _____
> Bill Wehrum
> Assistant Administrator
> Office of Air and Radiation
> U.S. Environmental Protection Agency
> (202) 564-7404
>
> -----Original Message-----
> From: Macnabb, Philip <PMacnabb@sterigenics.com>
> Sent: Monday, January 28, 2019 12:07 PM
> To: Wehrum, Bill <Wehrum.Bill@epa.gov>
> Subject: Call
>
> Bill
>
> Are you still available for a call today, 4pm EST. If so, what number should I use?
>
> Thanks
>
> Sent from my iPhone
> This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Appointment

From: Weinstock, Lewis [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DF30E068EFB24A24B35D63BE0596AD9B-LWEINS02]
Sent: 3/12/2019 3:36:23 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: General Discussion re: Lake County
Location: WJC-N 5406 + Video to RTP

Start: 3/12/2019 6:30:00 PM
End: 3/12/2019 7:00:00 PM
Show Time As: Busy

Appointment

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 3/12/2019 3:34:34 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: General Discussion re: Lake County
Location: WJC-N 5406 + Video to RTP

Start: 3/12/2019 6:30:00 PM
End: 3/12/2019 7:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 3/11/2019 7:28:57 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 3/11/2019 8:15:00 PM
End: 3/11/2019 8:45:00 PM
Show Time As: Busy

Appointment

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 12/6/2018 2:39:37 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Willowbrook Samples follow Up
Location: WJC - N 5400 + Video with RTP + Personal Phone / Ex. 6

Start: 12/6/2018 4:00:00 PM
End: 12/6/2018 4:30:00 PM

Recurrence: (none)

Appointment

From: Weinstock, Lewis [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DF30E068EFB24A24B35D63BE0596AD9B-LWEINS02]
Sent: 12/5/2018 7:28:36 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Willowbrook Samples follow Up
Location: WJC - N 5400 + Video with RTP + Personal Phone / Ex. 6

Start: 12/6/2018 4:00:00 PM
End: 12/6/2018 4:30:00 PM

Recurrence: (none)

Appointment

From: Rimer, Kelly [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=123A21A46D0E4E53A590798CDCC3FB47-KRIMER]
Sent: 12/4/2018 9:29:27 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Willowbrook Samples follow Up
Location: WJC - N 5400 + Video with RTP + Personal Phone / Ex. 6

Start: 12/6/2018 4:00:00 PM
End: 12/6/2018 4:30:00 PM

Recurrence: (none)

Appointment

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 12/4/2018 9:21:04 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Willowbrook Samples follow Up
Location: WJC - N 5400 + Video with RTP + Personal Phone / Ex. 6

Start: 12/6/2018 4:00:00 PM
End: 12/6/2018 4:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 12/4/2018 9:18:55 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Willowbrook Samples follow Up
Location: WJC - N 5400 + Video with RTP + Personal Phone / Ex. 6

Start: 12/6/2018 4:00:00 PM
End: 12/6/2018 4:30:00 PM
Show Time As: Busy

Appointment

From: Rimer, Kelly [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=123A21A46D0E4E53A590798CDCC3FB47-KRIMER]
Sent: 12/4/2018 12:34:29 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Meeting re: Willowbrook samples
Location: WJC - N 5400 + Video with RTP + Personal Phone / Ex. 6

Start: 12/4/2018 8:30:00 PM
End: 12/4/2018 9:00:00 PM

Recurrence: (none)

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 12/4/2018 12:31:34 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: FW: Meeting re: Willowbrook samples
Location: WJC - N 5400 + Video with RTP + Personal Phone / Ex. 6

Start: 12/4/2018 8:30:00 PM
End: 12/4/2018 9:00:00 PM
Show Time As: Busy

Appointment

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 12/3/2018 8:32:19 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Meeting re: Willowbrook samples
Location: WJC - N 5400 + Video with RTP + Personal Phone / Ex. 6

Start: 12/4/2018 8:30:00 PM
End: 12/4/2018 9:00:00 PM
Show Time As: Busy

Appointment

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 12/3/2018 8:31:53 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Meeting re: Willowbrook samples
Location: WJC - N 5400 + Video with RTP + Personal Phone / Ex. 6

Start: 12/4/2018 8:30:00 PM
End: 12/4/2018 9:00:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 12/3/2018 5:09:00 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 12/3/2018 10:00:00 PM
End: 12/3/2018 10:30:00 PM
Show Time As: Busy

Appointment

From: Cain, Alexis [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0249D52AFE7A491EA6859BF276E694E9-ACAIN]
Sent: 11/28/2018 3:13:02 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: FW: NATA briefing for Lake County Elected Officials
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM
Show Time As: Busy

Appointment

From: Nam, Ed [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A2653F1DDD59470688BA557DD84D9690-NAM, ED]
Sent: 11/27/2018 5:08:45 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: FW: NATA briefing for Lake County Elected Officials
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM
Show Time As: Busy

Appointment

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 11/27/2018 4:29:14 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: NATA briefing for Lake County Elected Officials
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM

Recurrence: (none)

Appointment

From: Rimer, Kelly [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=123A21A46D0E4E53A590798CDCC3FB47-KRIMER]
Sent: 11/27/2018 4:12:23 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: NATA briefing for Lake County Elected Officials
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM

Recurrence: (none)

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 11/26/2018 3:02:47 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Call with Phil McNabb re: Sterigenics
Location: Personal Phone / Ex. 6

Start: 11/26/2018 9:30:00 PM
End: 11/26/2018 10:00:00 PM
Show Time As: Busy

Appointment

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 12/12/2018 11:44:24 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Conference call with Willowbrook citizen Jennifer McConaghy re: Sterigenics facility
Location: WJC - N 5400 + conference call

Start: 12/13/2018 5:30:00 PM
End: 12/13/2018 6:00:00 PM
Show Time As: Busy

Appointment

From: Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]
Sent: 2/25/2019 8:56:24 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 2/25/2019 9:00:00 PM
End: 2/25/2019 9:30:00 PM
Show Time As: Busy

Appointment

From: Thiede, Kurt [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3CC09FAC5ACC4CE1BA689FB2CE70D459-THIEDE, KUR]
Sent: 2/25/2019 6:53:08 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Fwd: Call with Region 5 re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM
Show Time As: Busy

Appointment

From: Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]
Sent: 12/14/2018 12:19:30 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: FW: Conference call with Willowbrook citizen Jennifer McConaghy re: Sterigenics facility
Location: WJC - N 5400 + conference call

Start: 12/13/2018 5:30:00 PM
End: 12/13/2018 6:00:00 PM
Show Time As: Busy

Appointment

From: Cory, Preston (Katherine) [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BFD80B15F6D04A3BA11FC8CA3C85BC50-CORY, KATHE]
Sent: 9/25/2018 8:36:14 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Meeting re: Willowbrook
Location: WJC - N 5400

Start: 9/26/2018 2:00:00 PM
End: 9/26/2018 2:30:00 PM

Recurrence: (none)

Appointment

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 9/25/2018 8:32:59 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Meeting re: Willowbrook
Location: WJC - N 5400

Start: 9/26/2018 2:00:00 PM
End: 9/26/2018 2:30:00 PM

Recurrence: (none)

Appointment

From: Williams, Felicia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6527F339DDB0443C8FA6188E5038057D-FWILLI02]
Sent: 9/25/2018 3:09:05 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Meeting re: Willowbrook
Location: WJC - N 5400

Start: 9/26/2018 2:00:00 PM
End: 9/26/2018 2:30:00 PM
Show Time As: Busy

Appointment

From: Stepp, Cathy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BEFDAFC0FA1A425EAE232F60AD9BDA1D-STEPP, CATH]
Sent: 9/25/2018 3:08:48 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Meeting re: Willowbrook
Location: WJC - N 5400

Start: 9/26/2018 2:00:00 PM
End: 9/26/2018 2:30:00 PM
Show Time As: Busy

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 11/8/2018 6:31:37 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: HOLD || Meeting with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 11/13/2018 2:30:00 PM
End: 11/13/2018 3:15:00 PM
Show Time As: Busy

Appointment

From: Davis, Matthew [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=84111EC08C504B6BAAE0510B2D2CE46A-DAVIS, MATTHEW]
Sent: 9/17/2018 7:32:22 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Call with Rep. Foster re: Willowbrook, IL Sterigenics facility and ethylene oxide
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 9/18/2018 2:00:00 PM
End: 9/18/2018 2:30:00 PM

Recurrence: (none)

Appointment

From: Ringel, Aaron [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1654BDC951284A6D899A418A89FB0ABF-RINGEL, AAR]
Sent: 9/17/2018 7:11:43 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Call with Rep. Foster re: Willowbrook, IL Sterigenics facility and ethylene oxide
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 9/18/2018 2:00:00 PM
End: 9/18/2018 2:30:00 PM

Recurrence: (none)

Appointment

From: Leopold, Matt (OGC) [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4E5CDF09A3924DADA6D322C6794CC4FA-LEOPOLD, MA]
Sent: 2/22/2019 5:44:44 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Call with Region 5 re: Sterigenics
Location: WJC - N + Personal Phone / Ex. 6

Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM

Recurrence: (none)

Appointment

From: Schwab, Justin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EED0F609C0944CC2BBDB05DF3A10AADB-SCHWAB, JUS]
Sent: 2/22/2019 5:43:40 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Tentative: Call with Region 5 re: Sterigenics
Location: WJC - N + Personal Phone / Ex. 6

Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM

Recurrence: (none)

Appointment

From: Williams, Felicia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6527F339DDB0443C8FA6188E5038057D-FWILLI02]
Sent: 2/22/2019 4:45:23 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]

Subject: Accepted: Call with Region 5 re: Sterigenics
Location: WJC - N + Personal Phone / Ex. 6

Start: 2/22/2019 9:15:00 PM
End: 2/22/2019 10:00:00 PM
Show Time As: Busy

Message

From: Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent: 1/7/2019 4:41:40 PM
To: PMacnabb@sterigenics.com
Subject: Today

Phil - I need to cancel our discussion this afternoon. Since we were able to catch up on Friday, I suggest we push to next Monday.

_____
Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

Message

From: Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent: 11/30/2018 5:46:37 PM
To: Tsirigotis, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d19c179f3ccb4fadb48e3ae85563f132-PTSIRIGO]
Subject: Sterigenics Meetings

Peter – I wanted to let you know that Mike Koerber, Kelly Rimer, Allison Davis and the rest of the OAQPS team did a terrific job in planning and implementing the Sterigenics events in Willowbrook yesterday. The community obviously remains highly concerned. But, the open house, public meeting, and meetings with elected officials entailed open and frank discussions, without the rancor and disruptions that accompanied the first public meeting. Your team deserve lots of credit here.

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

Message

From: Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent: 11/29/2018 6:44:43 PM
To: Macnabb, Philip [PMacnabb@sterigenics.com]
CC: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; tcr@vnf.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=60634a7f78964380838648935cd3d7b1-tcr@vnf.com]
Subject: Re: Sterigenics Visit

Hi Phil. Our meeting ran a bit long. Will will be a few minutes late to the facility. See you soon.

_____
Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

On Nov 29, 2018, at 10:11 AM, Macnabb, Philip <PMacnabb@sterigenics.com> wrote:

Thanks Clint

Here is the statement we would like read at the Forum. Who will actually read this statement?

Philip Macnabb
President
Sterigenics, A Sotera Health company
2015 Spring Rd, Suite 650
Oak Brook, IL 60523
pmacnabb@sterigenics.com
www.sterigenics.com
O: (630) 928-1733
<image003.jpg>

From: Woods, Clint [mailto:woods.clint@epa.gov]
Sent: Wednesday, November 28, 2018 11:09 AM
To: Macnabb, Philip
Cc: Wehrum, Bill; Koerber, Mike; tcr@vnf.com
Subject: Re: Sterigenics Visit

Phil,

You're right on the statement for the community meeting, and I believe Mike Koerber has been in touch with Kathy Hoffman. I think we need to be back to Ashton Place ahead of 3:00 on Thursday.

Thanks!

Clint

On Nov 28, 2018, at 10:16 AM, Macnabb, Philip <PMacnabb@sterigenics.com> wrote:

Bill/Clint

Mike spoke to Kathy Hoffman yesterday and explained that the open house will be limited to gov't and regulatory groups so that we will not need to plan to participate. We understand and will adjust accordingly. If you receive any questions whereby you need some data or information from us to answer, please let us know and we will help out the best we can.

Also, on our call Monday, Clint offered the option of a statement that we could submit for the evening session, is that still an option? If so we would like to provide one to you and assume that you would want that by midday tomorrow?

Finally, I believe we are confirmed for a site visit for you both on Thursday at 1pm. I was wondering how much time you have so that I can know how to set up your visit. I believe that your priority is the see the process and understand our emission controls set up. If you have other expectations, please let me know.

My cell phone is (919) 996-9590 if you need to reach me during your travels for any reason.

Have a safe trip.

Thank you

Philip Macnabb
President
Sterigenics, A Sotera Health company
2015 Spring Rd, Suite 650
Oak Brook, IL 60523
pmacnabb@sterigenics.com
www.sterigenics.com
O: (630) 928-1733
<image002.jpg>

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must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

<Sterigenics Willowbrook Town Hall Statement 11.29.18.pdf>

Message

From: Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent: 11/21/2018 8:37:58 PM
To: Macnabb, Philip [PMacnabb@sterigenics.com]
Subject: RE: Touch Base

I will call in a couple of minutes.

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

From: Macnabb, Philip <PMacnabb@sterigenics.com>
Sent: Wednesday, November 21, 2018 3:01 PM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>
Subject: Touch Base

At what point do you want to touch base today?

Thanks

Philip Macnabb
President
Sterigenics, A Sotera Health company
2015 Spring Rd, Suite 650
Oak Brook, IL 60523
pmacnabb@sterigenics.com
www.sterigenics.com
O: (630) 928-1733

Sterigenics®
A Sotera Health company

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Message

From: Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent: 2/16/2019 12:16:44 AM
To: Macnabb, Philip [PMacnabb@sterigenics.com]
CC: tcr@vnf.com [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=60634a7f78964380838648935cd3d7b1-tcr@vnf.com]
Subject: Re: IL EPA

Phil - Thanks for letting us know.

_____
Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

> On Feb 15, 2019, at 7:12 PM, Macnabb, Philip <PMacnabb@sterigenics.com> wrote:
>
> Bill
>
> I wanted to make you aware that tonight at 5pm we received a "seal order" from IL EPA to stop using EO due to public health crisis. We will stop processing until we can get in front of a judge.
>
> Feel free to call my cell at (919) 996-9590 if you would like further details.
>
> Sent from my iPhone
> This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Message

From: Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent: 2/14/2019 1:16:32 AM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Subject: Fwd: Quick call

Delaney - Will you please squeeze this in the tomorrow? Thanks.

_____
Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

Begin forwarded message:

> **From:** "Macnabb, Philip" <PMacnabb@sterigenics.com>
> **Date:** February 13, 2019 at 6:41:41 PM EST
> **To:** "Wehrum.Bill@epa.gov" <Wehrum.Bill@epa.gov>
> **Subject: Quick call**
>
> Bill
>
> Let me know if you have a few minutes tonight or tomorrow for a brief call. I want to give you a heads up on a path we are pursuing this fr
>
> Sent from my iPhone
> This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Message

From: Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent: 2/14/2019 10:50:42 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: Time to talk about Willowbrook?

Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

Begin forwarded message:

From: "Greaves, Fielding" <FGreaves@AdvaMed.org>
Date: February 14, 2019 at 12:55:37 PM EST
To: "wehrum.william@epa.gov" <wehrum.william@epa.gov>
Cc: "Crist, Greg" <GCrist@AdvaMed.org>
Subject: Time to talk about Willowbrook?

Hi William,

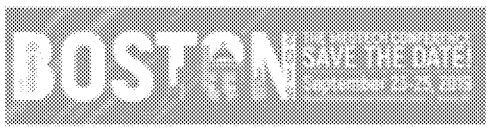
Do you have a few minutes to connect today about the situation in Willowbrook? I just want to touch base and offer myself as a resource and establish contact so if we need to communicate in this process we have the line open already.

I have a fair amount of time today - shoot me a call if you can or let me know if you can connect for 5 minutes. My cell is 9168382264

Thank you

Fielding Greaves

FIELDING GREAVES
Director | State Government & Regional Affairs (West)
Advanced Medical Technology Association (AdvaMed)
Mobile: 916-838-2264 | Office: 202-434-7265
advamed.org | lifechanginginnovation.org



Message

From: Wehrum, Bill [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=33D96AE800CF43A3911D94A7130B6C41-WEHRUM, WIL]
Sent: 1/28/2019 5:08:31 PM
To: Macnabb, Philip [PMacnabb@sterigenics.com]
Subject: RE: Call

I will be up on the Hill with Wheeler at that time. Are you available at 5:30? If so, please call Personal Phone / Ex. 6 Personal Phone / Ex. 6 Thanks.

_____
Bill Wehrum
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

-----Original Message-----
From: Macnabb, Philip <PMacnabb@sterigenics.com>
Sent: Monday, January 28, 2019 12:07 PM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>
Subject: Call

Bill

Are you still available for a call today, 4pm EST. If so, what number should I use?

Thanks

Sent from my iPhone
This e-mail and any files transmitted with it may contain privileged and/or confidential information. If you believe this e-mail or any of its attachments were not intended for you, you must not use, distribute, forward, print or copy this e-mail or any attached files. If you have received this e-mail in error, please notify the sender by reply e-mail and then immediately delete the email and all attachments.

Message

Sent: 1/22/2019 5:59:32 PM
To: Haman, Patricia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ebb27cd881d41b19a30a491dc3f3f57-phaman]
CC: Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]; Shaw, Betsy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=31ca1476a7674825a131cb2c0d6c88c8-BShaw03]; Lubetsky, Jonathan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e125d09a658e48119789ccae5712b4a5-JLUBETSK]; Frye, Tony (Robert) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=58c08abdfc1b4129a10456b78e6fc2e1-Frye, Rober]
Subject: RE: Changes to the QFRs I wanted to make sure you saw

Pat,

Clint Woods
Deputy Assistant Administrator
Office of Air and Radiation, U.S. EPA
202.564.6562

From: Haman, Patricia
Sent: Tuesday, January 22, 2019 12:34 PM
To: Woods, Clint <woods.clint@epa.gov>
Cc: Harlow, David <harlow.david@epa.gov>; Shaw, Betsy <Shaw.Betsy@epa.gov>; Lubetsky, Jonathan <Lubetsky.Jonathan@epa.gov>; Frye, Tony (Robert) <frye.robert@epa.gov>
Subject: Changes to the QFRs I wanted to make sure you saw

Hi Clint, Based on our discussion earlier, it seems like you folks have a great handle on the QFRs. I walked through the latest version of assignments and wanted to make sure you were aware of some revisions:

56. OGC changed this one from OECA/OGC to OECA/OAR.
66: This one has been changed from just OP to OP/OAR.
48. And finally, my colleague who works with OLEM asked me to ask you to help with 48. Would you please look at the list and for vi (Sterigenics) and any other site for which OAR is involved, would you please help answer the question?

Thank you, Pat

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 12/3/2018 4:51:10 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]

Subject: Call with Phil McNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 12/3/2018 8:00:00 PM
End: 12/3/2018 8:30:00 PM
Show Time As: Tentative

Message

Sent: 12/10/2018 5:23:50 PM
To: Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]
Subject: RE: Hawthorne needs a Sterigenics update

Deliberative Process / Ex. 5

From: Davis, Alison
Sent: Monday, December 10, 2018 11:54 AM
To: Woods, Clint <woods.clint@epa.gov>
Subject: FW: Hawthorne needs a Sterigenics update

Please see below – this is the item I sent on Friday. OK with this?

From: Singer, Joshua
Sent: Monday, December 10, 2018 11:52 AM
To: Davis, Alison <Davis.Alison@epa.gov>
Cc: Grantham, Nancy <Grantham.Nancy@epa.gov>; Block, Molly <block.molly@epa.gov>; Press <Press@epa.gov>; Rowan, Anne <rowan.anne@epa.gov>; Kelley, Jeff <kelley.jeff@epa.gov>
Subject: Re: Hawthorne needs a Sterigenics update

Deliberative Process / Ex. 5

from my iPhone

On Dec 7, 2018, at 5:16 PM, Davis, Alison <Davis.Alison@epa.gov> wrote:

Let me check

Sent from my iPhone

On Dec 7, 2018, at 5:56 PM, Grantham, Nancy <Grantham.Nancy@epa.gov> wrote:

As long as Clint has approved -- it is okay to send thanks ng

Nancy Grantham
Office of Public Affairs
US Environmental Protection Agency
202-564-6879 (desk)
202-253-7056 (mobile)

-----Original Message-----
From: Singer, Joshua
Sent: Friday, December 07, 2018 5:55 PM
To: Davis, Alison <Davis.Alison@epa.gov>; Block, Molly <block.molly@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Press <Press@epa.gov>
Cc: Rowan, Anne <rowan.anne@epa.gov>; Kelley, Jeff <kelley.jeff@epa.gov>
Subject: RE: Hawthorne needs a Sterigenics update

Thanks, Alison.

It is OK to send the response to Hawthorne?

Thanks again.

Josh Singer
U.S. EPA, Region 5
phone: 312-353-5069
singer.joshua@epa.gov

-----Original Message-----
From: Davis, Alison
Sent: Friday, December 07, 2018 4:23 PM
To: Singer, Joshua <Singer.Joshua@epa.gov>; Block, Molly <block.molly@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Press <Press@epa.gov>
Cc: Rowan, Anne <rowan.anne@epa.gov>; Kelley, Jeff <kelley.jeff@epa.gov>
Subject: RE: Hawthorne needs a Sterigenics update

Thanks.

Deliberative Process / Ex. 5

-Alison

-----Original Message-----

From: Singer, Joshua

Sent: Friday, December 07, 2018 5:20 PM

To: Davis, Alison <Davis.Alison@epa.gov>; Block, Molly <block.molly@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Press <Press@epa.gov>

Cc: Rowan, Anne <rowan.anne@epa.gov>; Kelley, Jeff <kelley.jeff@epa.gov>

Subject: RE: Hawthorne needs a Sterigenics update

Nancy/HQ,

Deliberative Process / Ex. 5

Josh Singer

U.S. EPA, Region 5

phone: 312-353-5069

singer.joshua@epa.gov

-----Original Message-----

From: Davis, Alison

Sent: Friday, December 07, 2018 3:57 PM

To: Singer, Joshua <Singer.Joshua@epa.gov>; Block, Molly <block.molly@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Press <Press@epa.gov>

Cc: Rowan, Anne <rowan.anne@epa.gov>; Kelley, Jeff <kelley.jeff@epa.gov>

Subject: RE: Hawthorne needs a Sterigenics update

Hold for a minute

-----Original Message-----

From: Singer, Joshua

Sent: Friday, December 07, 2018 4:54 PM

To: Block, Molly <block.molly@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Press <Press@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>

Cc: Rowan, Anne <rowan.anne@epa.gov>; Kelley, Jeff <kelley.jeff@epa.gov>

Subject: FW: Hawthorne needs a Sterigenics update

Deliberative Process / Ex. 5

Josh Singer

U.S. EPA, Region 5

phone: 312-353-5069

singer.joshua@epa.gov

-----Original Message-----

From: Hawthorne, Michael [mailto:mhawthorne@chicagotribune.com]

Sent: Friday, December 07, 2018 3:29 PM

To: Singer, Joshua <Singer.Joshua@epa.gov>

Cc: Kelley, Jeff <kelley.jeff@epa.gov>; Rowan, Anne <rowan.anne@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Konkus, John <konkus.john@epa.gov>

Subject: Re: Hawthorne needs a Sterigenics update

Important follow up question? Does EPA have a met station in the community? If not, why? Given the complexities of our local airshed, and the stakes of what is at issue here,

shouldn't EPA also be considering local wind patterns rather than relying on Midway data?

On Dec 7, 2018, at 1:44 PM, Singer, Joshua <Singer.Joshua@epa.gov> wrote:

Michael,

Please see the response below and attribute to U.S. EPA. Thank you.

On December 7, U.S. EPA posted the first set of results from air quality monitoring in the Willowbrook, Ill. area. The agency is sampling air in eight locations in the community for the chemical ethylene oxide.

The data posted today are the results of three days of air quality sampling, which included three days of sampling at two locations near the Sterigenics commercial sterilizing facility; and one day of sampling at six locations in the community. Monitors detected ethylene oxide in the air at the two sites closest to the facility; they did not detect ethylene oxide at the six community-oriented sites (those at schools and in residential areas).

It is premature to draw conclusions from the data. U.S. EPA will conduct a full assessment of risk from ethylene oxide in Willowbrook, which we expect to complete by Spring 2019. The agency plans to continue monitoring in the Willowbrook area for three months and will continue to post data as it is available and quality assured.

Information about the monitoring and links to the data are available at: https://www.epa.gov/il/sterigenics-willowbrook-facility-latest-update

Background – additional information:

- On November 21, 2018, EPA announced that it had identified an issue with the analytical method used in previous EPA monitoring. We have changed the analytical method, so that the issue does not affect these results.

Note: Results of the monitoring U.S. EPA is currently conducting in Willowbrook cannot be directly compared to the May 2018 monitoring. U.S. EPA is currently sampling air for 24-hour periods. The U.S. Region 5 monitoring included 12-hour samples, and "grab samples." In a grab sample, a canister is opened, collects air for a very short period of time, and is then closed. Neither 12-hour samples nor grab samples can be compared to samples collected over 24 hours. In addition, the current samples are being analyzed using a method that is more refined for ethylene oxide.

-----Original Message-----

From: Hawthorne, Michael [mailto:mhawthorne@chicagotribune.com]

Sent: Friday, December 07, 2018 8:36 AM

To: Kelley, Jeff <kelley.jeff@epa.gov>; Singer, Joshua <Singer.Joshua@epa.gov>

Subject: Hawthorne needs a Sterigenics update

Shouldn't you folks have some test results back by now?

Michael

Contact

Full Name: thalik@willowbrook.il.us

E-mail: thalik@willowbrook.il.us

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 11/27/2018 4:01:19 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]

Subject: NATA briefing for Lake County Elected Officials
Attachments: Details and VTC for 11/28 meeting
Location: WJC - N 5400 + Video with R5 HQ, Lake Michigan Room

Start: 11/28/2018 8:00:00 PM
End: 11/28/2018 9:00:00 PM
Show Time As: Tentative

TO: Bill Wehrum, Clint Woods

Details and VTC
for 11/28 meeting

Message

From: woods.clint@epa.gov [woods.clint@epa.gov]
Sent: 2/25/2019 2:18:08 PM
To: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]
CC: Harlow, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b5a9a34e31fc4fe6b2beaddda2affa44-Harlow, Dav]
Subject: Re: Sterigenics U.S. LLC v. Kim et al motion for miscellaneous relief

Thanks so much - We're hoping to tag up and find some time to touch base with R5

On Feb 25, 2019, at 8:50 AM, Koerber, Mike <Koerber.Mike@epa.gov> wrote:

> Clint, David – I see that our 1-on-1 for today was cancelled. The only time-sensitive issue I had was the request from the IL AG – see below. Please advise as to next steps. Thanks.
>
> Mike
>
> ---
>
> **From:** Koerber, Mike
> **Sent:** Sunday, February 24, 2019 10:04 AM
> **To:** Wallace, Elizabeth <EWallace@atg.state.il.us>
> **Cc:** Nelson, Leverett <nelson.leverett@epa.gov>; Dunn, Matthew <MDunn@atg.state.il.us>; Armitage, Julie <Julie.Armitage@Illinois.gov>; Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Woods, Clint <woods.Clint@epa.gov>
> **Subject:** Re: Sterigenics U.S. LLC v. Kim et al motion for miscellaneous relief
>
> Beth: Got it. We will be back in touch shortly.
>
> Mike
>
> Sent from my iPhone
>
> On Feb 24, 2019, at 9:29 AM, Wallace, Elizabeth <EWallace@atg.state.il.us> wrote:
>
>> Good morning. Next up in the Seal Order case brought by Sterigenics against John Kim/IEPA, we will be before the federal judge on Tuesday, 2/26, on Sterigenics' motion to set a hearing date for the Preliminary Injunction hearing. Attached is the motion and notice. Just fyi, we (the State) also filed a Motion to Dismiss Sterigenics' case in federal court.
>>
>> We are preparing for the Preliminary Injunction hearing which is essentially a trial put together and held in a very short period of time. We will need to put the USEPA's sample results into evidence and will need testimony from someone who was involved with taking the samples, and someone from the lab who oversees the analytical process.

Consistent with your public statements that USEPA is working very closely with the State on this matter, we appreciate your assistance on providing the support necessary to get USEPA's sample results into evidence.

I look forward to hearing from you and thank you.

Beth Wallace

312-814-5396

From: usdc_ecf_ilnd@ilnd.uscourts.gov <usdc_ecf_ilnd@ilnd.uscourts.gov>
Sent: Thursday, February 21, 2019 7:12 PM
To: ecfmail_ilnd@ilnd.uscourts.gov
Subject: Activity in Case 1:19-cv-01219 Sterigenics U.S. LLC v. Kim et al motion for miscellaneous relief

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended. ***NOTE TO PUBLIC ACCESS USERS* Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.**

United States District Court

Northern District of Illinois - CM/ECF LIVE, Ver 6.2.2

Notice of Electronic Filing

The following transaction was entered by Kelly, Gerard on 2/21/2019 at 7:12 PM CST and filed on 2/21/2019

Case Name:	Sterigenics U.S. LLC v. Kim et al
Case Number:	1:19-cv-01219
Filer:	Sterigenics U.S. LLC
Document Number:	29

Docket Text:
MOTION by Plaintiff Sterigenics U.S. LLC For Status Conference To

Set A Hearing Date On Motion For Preliminary Injunction (Kelly, Gerard)

1:19-cv-01219 Notice has been electronically mailed to:

Daniel Isaac Rottenberg drottenberg@atg.state.il.us

Elizabeth A. Wallace ewallace@atg.state.il.us

Elizabeth M. Chiarello echiarello@sidley.com, efilingnotice@sidley.com, elizabeth-chiarello-8282@ecf.pacerpro.com

Gerard David Kelly gkelly@sidley.com, efilingnotice@sidley.com, gerard-kelly-0262@ecf.pacerpro.com

Kate F Lambert klambert@sidley.com, efilingnotice@sidley.com, kate-lambert-5694@ecf.pacerpro.com

Maja C. Eaton meaton@sidley.com, efilingnotice@sidley.com, jbuss@sidley.com, maja-eaton-6947@ecf.pacerpro.com

Matthew Joseph Dunn mdunn@atg.state.il.us

Stephanie C. Stern sstern@sidley.com, efilingnotice@sidley.com, stephanie-stern-2291@ecf.pacerpro.com

Stephen J. Sylvester ssylvester@atg.state.il.us

1:19-cv-01219 Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description: Main Document
Original filename:n/a
Electronic document Stamp:
[STAMP dcecfStamp_ID=1040059490 [Date=2/21/2019] [FileNumber=20146106-0]
[41a7552c71a5be4080066fcb71d93b02c1341befc30a4c37b11eef3a6f693f44dd0dec3174e4792df05b04d94867439db22cfb12abe839e7444cc1cbc32f4ce9]]

<190221- Motion for a Status Conference to Set a Hearing Date on Motion for PI.pdf>

<190221- Notice of Motion for a Status Conference to Set Hearing Date on Motion for PI.pdf>

Message

From: woods.clint@epa.gov [woods.clint@epa.gov]
Sent: 2/25/2019 2:00:36 PM
To: Nelson, Leverett [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2229a07c2cb442b182332d9dcc325f13-LNelson]
Subject: Re: August 2018 Sterigenics Confidentiality Agreement with Illinois EPA

Rett,

Thanks so much! Hoping to touch base soon

> On Feb 22, 2019, at 6:09 PM, Nelson, Leverett <nelson.leverett@epa.gov> wrote:
>
> Also wanted to make sure you have the state's updated proposed revision to the August 2018 confidentiality agreement (2nd attachment)
>
> -Rett
>
> -----Original Message-----
> From: Nelson, Leverett
> Sent: Friday, February 22, 2019 4:08 PM
> To: Thiede, Kurt <thiede.kurt@epa.gov>; Newton, Cheryl <Newton.Cheryl@epa.gov>; Nam, Ed <nam.ed@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>; Woods, Clint <woods.Clint@epa.gov>; Leopold, Matt (OGC) <Leopold.Matt@epa.gov>; Schwab, Justin <schwab.justin@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Harlow, David <harlow.david@epa.gov>; Brazauskas, Joseph <brazauskas.joseph@epa.gov>
> Cc: Williams, Felicia <Williams.Felicia@epa.gov>
> Subject: August 2018 Sterigenics Confidentiality Agreement with Illinois EPA
>
> As promised. Very similar to the recent draft you have (expanding the parties to include Illinois AG's office and the DuPage County State's Attorney's Office).
>
> I look forward to talking on Monday. Thanks.
>
> -Rett
>
> T. Leverett Nelson
> Regional Counsel
> U.S. EPA, Region 5
> Chicago, IL
>
>
> <Sterigenics Conf Agmt IEPA EPA 8 13 2018.pdf>
> <Sterigenics_ConfAgmnt_IEPA-IAG-DCSA_2-20-19C_Clean.docx>

Appointment

From: Rakosnik, Delaney [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=274573739A9F446883072599086EDEDD-RAKOSNIK, D]
Sent: 2/25/2019 8:56:11 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; David Harlow (harlow.david@epa.gov); Woods, Clint

Subject: Call with Phil MacNabb re: Sterigenics
Location: WJC - N 5400 + Personal Phone / Ex. 6

Start: 2/25/2019 9:00:00 PM
End: 2/25/2019 9:30:00 PM
Show Time As: Tentative

Recurrence: Weekly
every Monday from 4:00 PM to 4:30 PM

Message

From: woods.clint@epa.gov [woods.clint@epa.gov]
Sent: 2/21/2019 12:50:58 AM
To: Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]
CC: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Weinstock, Lewis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=df30e068efb24a24b35d63be0596ad9b-LWEINS02]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; DeLuca, Isabel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b021c30cbee4637a7c7ca683e5e044a-IDELUCA]
Subject: Re: Please review - draft desk statement for data posting

This looks good as well

On Feb 20, 2019, at 6:52 PM, Davis, Alison <Davis.Alison@epa.gov> wrote:

Statement

Deliberative Process / Ex. 5

Message

From: woods.clint@epa.gov [woods.clint@epa.gov]
Sent: 3/12/2019 1:23:38 PM
To: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
Subject: Fwd: Do you need anything else on this?
Attachments: 19.02.15 - Letter to EPA Air Radiation Division re EtO Air Monitoring in Lake Co.pdf; ATT00001.htm; 18.10.17 0 19-000-0435.pdf; ATT00002.htm; 19.01.29- Duckworth et al to EPA opposing RTR on HCL that undermines ETO risk assessment.pdf; ATT00003.htm; 19.02.13 - IL delegation to Wheeler on Sterigenics national background study.pdf; ATT00004.htm; Meeting with Senator Durbin.updated 3.11.19.v2.docx; ATT00005.htm

Begin forwarded message:

From: "Davis, Alison" <Davis.Alison@epa.gov>
To: "Woods, Clint" <woods.clint@epa.gov>
Subject: Do you need anything else on this?

We might want to add that Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

From: Davis, Alison
Sent: Monday, March 11, 2019 11:49 AM
To: Woods, Clint <woods.Clint@epa.gov>
Subject: RESENDING FW: Meeting with Senator Durbin.updated 3.11.19.v2.docx

Removing "Updating" from the header. Please use this version. Thanks.

From: Davis, Alison
Sent: Monday, March 11, 2019 11:46 AM
To: Woods, Clint <woods.Clint@epa.gov>
Subject: Meeting with Senator Durbin.updated 3.11.19.v2.docx

Hi Clint,
Here you go. R5 provided info on Lake County.
This also references several letters from the Senator on EtO, and says they are attached. They are included here.
-Alison

Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 2/4/2019 4:45:30 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: RE: Press inquiry

Thanks. Unless you'd like us to add some of this (below), we'll stick with what we have.

From: Woods, Clint
Sent: Monday, February 04, 2019 11:43 AM
To: Davis, Alison <Davis.Alison@epa.gov>
Subject: FW: Press inquiry

I'm fine with packet response – Here was my suggestion from 1/30/19

Deliberative Process / Ex. 5

Appointment

From: Microsoft Outlook [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICROSOFTEXCHANGE329E71EC88AE4615BBC36AB6CE41109EF7088051]
Sent: 9/26/2018 5:38:01 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]

Subject: Meeting Forward Notification: Follow up on EtO and Willowbrook
Location: Call in: Personal Phone / Ex. 6 participation code: Personal Phone / Ex. 6

Start: 9/26/2018 8:00:00 PM
End: 9/26/2018 8:30:00 PM

Recurrence: (none)

Your meeting was forwarded

D'Amico, Louis has forwarded your meeting request to additional recipients.

Meeting

Follow up on EtO and Willowbrook

Meeting Time

Wednesday, September 26, 2018 4:00 PM-4:30 PM.

Recipients

Bussard, David

pjb7@cdc.gov

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

Appointment

From: Orme-Zavaleta, Jennifer [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3C5A111DC377411595E5B24B5D96146B-ORME-ZAVALETA, JENNIFER]
Sent: 9/26/2018 5:21:32 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]

Subject: Accepted: Follow up on EtO and Willowbrook
Location: Call in: Personal Phone / Ex. 6 participation code Personal Phone / Ex. 6

Start: 9/26/2018 8:00:00 PM
End: 9/26/2018 8:30:00 PM

Recurrence: (none)

Appointment

From: Rimer, Kelly [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=123A21A46D0E4E53A590798CDCC3FB47-KRIMER]
Sent: 9/26/2018 5:20:43 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]

Subject: Accepted: Follow up on EtO and Willowbrook
Location: Call in Deliberative Process / Ex. 5 participation code: Deliberative Process / Ex. 5

Start: 9/26/2018 8:00:00 PM
End: 9/26/2018 8:30:00 PM

Recurrence: (none)

Message

From: Palich, Christian [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=330AD62E158D43AF93FCBBECE930D21A-PALICH, CHR]
Sent: 10/25/2018 1:12:27 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Frye, Tony (Robert) [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=58c08abdfc1b4129a10456b78e6fc2e1-Frye, Rober]; Ringel, Aaron [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1654bdc951284a6d899a418a89fb0abf-Ringel, Aar]; Lyons, Troy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=15e4881c95044ab49c6c35a0f5eef67e-Lyons, Troy]; Rodrick, Christian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6515dbe46dae466da53c8a3aa3be8cc2-Rodrick, Ch]
Subject: FW: Letter to AA Wheeler regarding Ethylene Oxide emissions in Lake County
Attachments: EPA Lake County EtO Ltr.pdf

Hi Clint,

See attached from both IL Senators and Congressman Schneider.

Christian R. Palich
Deputy Associate Administrator
Office of Congressional & Intergovernmental Affairs
U.S Environmental Protection Agency
O: 202.564.4944
C: 202.306.4656
E: Palich.Christian@epa.gov

From: Hunt, Jasmine (Durbin) [mailto:Jasmine_Hunt@durbin.senate.gov]
Sent: Wednesday, October 24, 2018 5:03 PM
To: Palich, Christian <palich.christian@epa.gov>; Lyons, Troy <lyons.troy@epa.gov>
Cc: Adhar, Radha (Duckworth) <Radha_Adhar@duckworth.senate.gov>; 'Brown, Tommy' <Tommy.Brown@mail.house.gov>; Mazzuca, Gina (Durbin) <Gina_Mazzuca@durbin.senate.gov>
Subject: Letter to AA Wheeler regarding Ethylene Oxide emissions in Lake County

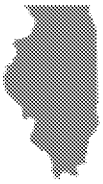
Hi Troy & Christian:

Could you pass this letter on to the appropriate person?

Thanks

Jasmine Hunt

Office of Senator Richard J. Durbin | Democratic Whip
711 Senate Hart Office Building | ☎ 202.224.2152 | 🖷 202.224.0400
✉ jasmine_hunt@durbin.senate.gov



E-NEWSLETTER

Appointment

From: D'Amico, Louis [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=78A91F83C4414910BE286EFE02004DBC-D'AMICO, LOUIS J.]
Sent: 9/26/2018 5:20:01 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]

Subject: Accepted: Follow up on EtO and Willowbrook
Location: Call in: Personal Phone / Ex. 6 articipation code: Personal Phone / Ex. 6

Start: 9/26/2018 8:00:00 PM
End: 9/26/2018 8:30:00 PM
Show Time As: Busy

Appointment

From: Payne, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=61B3204A683041079512B122C580A569-PAYNE, JAME]
Sent: 9/27/2018 2:47:00 AM
To: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Nam, Ed [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a2653f1ddd59470688ba557dd84d9690-Nam, Ed]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; Kelley, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e154fa5a5f744c70aa3da58e3f87aabe-JKelley]; Deamer, Eileen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f2d19c60656344f5b14361c0acc826d2-EDeamer]; Williams, Felicia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6527f339ddb0443c8fa6188e5038057d-FWilli02]; Martinez, Isidra [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f8b8fe5bb9774e1daaaf8d45c628a535-IMartine]
CC: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]

Subject: Sterigenics planning call tomorrow
Location: Please call Personal Phone / Ex. 6 code: Personal Phone / Ex. 6

Start: 9/27/2018 3:00:00 PM
End: 9/27/2018 3:30:00 PM
Show Time As: Tentative

IPhone friendly call-in number: **Personal Phone / Ex. 6**

Draft planning list below – anything else?

Working draft planning list

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 9/19/2018 9:31:29 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: FW: Chicago Magazine Article on Willowbrook / NADA

Clint -- I thought you would be interested in this. Thanks.

http://www.chicagomag.com/city-life/September-2018/About-That-Big-Potentially-Cancerous-Swath-of-Streeterville/

Tom Roberts | Partner
Van Ness Feldman LLP

1050 Thomas Jefferson Street, NW
Washington, DC 20007
(202) 298-1930 (o) | (202) 365-7750 (c) | tcr@vnf.com | vnf.com

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Message

From: InsideEPA.com [insideepa-alerts@iwpnews.com]
Sent: 3/4/2019 12:29:10 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: The Morning Headlines from InsideEPA.com -- March 4, 2019

REDEFINING EPA: Overhauling an agency and its mission -- Complete coverage

March 4, 2019

Latest News

New Mexico Court Push May Limit Impact Of Key Suit On State PFAS Powers

New Mexico officials are seeking to steer Defense Department litigation challenging their permit restrictions on per- and polyfluoroalkyl substances (PFAS) to state court, a move that if successful could limit any precedent the litigation may set on federal officials' ability to challenge such state actions.

Manufacturers Seek To Dismiss Landmark Class Action Suit Over PFAS

Manufacturers of per- and polyfluoroalkyl substances (PFAS) are seeking to dismiss a potentially landmark class action suit that is pursuing industry-funded, independent nationwide health studies and testing to determine the effects of multiple PFAS found in the blood of nearly all Americans.

Critics Fear EPA Region 1 Chief Will Exacerbate Rollbacks, Staff Attrition

The Trump administration has appointed former Maine environment chief Paul Mercer as the new EPA Region 1 administrator covering New England, drawing fire from environmentalists who fear his work under a conservative governor will bolster the agency's deregulatory agenda that has seen the region's staff shrink by attrition.

Hearing On Proposed CWA Rule Previews Legal Arguments On Final Policy

Speakers at EPA's public hearing on its proposed Clean Water Act (CWA) jurisdiction rule gave early signals of how they plan to attack or defend the eventual final version of the rule in court, with environmentalists hinting at procedural and substantive arguments that they could raise in litigation aimed at striking down a narrow CWA test.

Republican Carbon Tax Backer Sees Green New Deal As Political Opening

One of the few House GOP backers of a carbon tax is praising the Green New Deal (GND) as opening up the political "space" for his party to embrace what he says are more reasonable policies to curb greenhouse gases, confirming fears by hard-line opponents of carbon controls who are attacking the GND to preclude such scenarios.

District Judge Finds EPA Liability Under Superfund For Gold King Mine Spill

A federal district judge has ruled that EPA faces liability under the Superfund law for its accidental massive wastewater spill from the Gold King Mine cleanup in 2015, backing state and private plaintiffs' claims that federal cleanup projects like the mine can be subject to the statute's application to waste "operators," "arrangers," and "transporters."

Daily Feed

House GOP taps Graves for select climate panel

Rep. Garret Graves (R-LA) has acknowledged the need to adapt to rising sea levels, but generally opposes policies to reduce greenhouse gases.

Lawmakers, environmentalists seek hearing on EtO analysis

"It is not proper for EPA to be requesting comment on, or considering any change in use of the health risk factor for EtO" in a proposed rule focused on the hydrochloric acid sector, environmentalists say.

Quoted: Reaction to Andrew Wheeler's confirmation

Environmentalist critics of the Trump administration blasted Wheeler's confirmation, while industry groups largely said he would offer them more regulatory certainty.

Ewire: Pelosi demurs on House vote for Green New Deal

In today's Ewire: The House Speaker says she cannot say if Democrats will "take that and pass it because we have to go through our checks and balances of it with our committee chairs and the rest."

Superfund watchdog group expected to shutter

CPEO has mainly relied on funding from EPA and the Defense Department (DOD) but those funds ran out last year, "and there is no immediate prospect for new funding."

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Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 10/26/2018 3:34:33 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Re: Chicago Tribune Article

Great

Sent from my iPhone

On Oct 26, 2018, at 11:31 AM, Woods, Clint <woods.clint@epa.gov> wrote:

> Mind if I give you a call in 15 mins?
>
> On Oct 26, 2018, at 11:30 AM, Koerber, Mike <Koerber.Mike@epa.gov> wrote:
>
> > Let me know if you have time to talk today. Thanks.
> >
> > Sent from my iPhone
> >
> > On Oct 26, 2018, at 10:38 AM, Bremer, Kristen <Bremer.Kristen@epa.gov> wrote:
> >
> > > https://www.chicagotribune.com/news/local/breaking/ct-met-sterigenics-early-warning-hidden-from-public-20181025-story.html
> > >
> > > _____
> > > Kristen Bremer
> > > Policy Analysis & Communications
> > > U.S. EPA, Office of Air Quality Planning & Standards
> > > Email: bremer.kristen@epa.gov
> > > Phone: 919.541.9424
> > > Cell: 919.321.7652

Appointment

From: Atkinson, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB2155ADEF6A44AEA9410741F0C01D27-ATKINSON, EMILY]
Sent: 9/25/2018 3:06:00 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Stepp, Cathy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=befdafc0fa1a425eae232f60ad9bda1d-Stepp, Cath]; Thiede, Kurt [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc09fac5acc4ce1ba689fb2ce70d459-Thiede, Kur]

Subject: Meeting re: Willowbrook
Attachments: FW: DC Next Week
Location: WJC - N 5400

Start: 9/26/2018 2:00:00 PM
End: 9/26/2018 2:30:00 PM
Show Time As: Tentative

TO: Bill Wehrum, Clint Woods, Cathy Stepp, Kurt Thiede

FW: DC Next Week

OFFICE OF THE PRESIDENT
BOARD OF COMMISSIONERS OF COOK COUNTY
118 NORTH CLARK STREET
CHICAGO, ILLINOIS 60602
(312) 603-4600
TDD: (312) 603-5255

TONI PRECKWINKLE
PRESIDENT

2018 OCT 22 PM 12:33
OFFICE OF THE
RECEIVE SECRETARY

October 17, 2018

VIA US MAIL
Andrew R. Wheeler, Acting Administrator
U.S. Environmental Protection Agency
Office of the Administrator
Mail Code 1101A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Evaluation of Ethylene Oxide emissions in Cook County and surrounding Counties

Dear Administrator Wheeler:

Recent information from the U.S. Environmental Protection Agency (USEPA) 2014 National Air Toxics Assessment (NATA) indicates that residents may experience an increased risk of cancer due to Ethylene Oxide (EtO) emissions from the Sterigenics facility in Willowbrook, Illinois, which is located in DuPage County approximately one mile west of the Cook County line. In addition, approximately seven miles northeast of Sterigenics, is another facility that uses EtO in its manufacturing process, the Elé facility. The Elé facility in McCook, Illinois, is located within Cook County.

We understand that the USEPA has developed regulations under the Clean Air Act for the use and management of EtO, and has begun to review and update these regulations for facilities that emit EtO. The potential risks from the Sterigenics facility identified by review of information from the 2014 NATA, in addition to the risks that may be posed by the Elé facility, suggest that further analysis of the Elé facility by the U.S. EPA is necessary to protect Cook County residents and may provide data of relevance to the USEPA's ongoing regulatory review and emission reduction evaluation.

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As the USEPA gathers additional information concerning industrial facilities across the country that emit EtO and evaluates opportunities to reduce EtO emissions, I am requesting that USEPA conduct ambient air monitoring and stack testing for the Elé facility as part of its regulatory review and update. I look forward to your response.

Very truly yours,

Toni Preckwinkle, President
Cook County Board of Commissioners

EPA-HQ-2019-004008

TONI PRECKWINKLE, PRESIDENT
COOK COUNTY BOARD OF COMMISSIONERS
118 NORTH CLARK STREET, ROOM 537
CHICAGO, ILLINOIS
60602

S SUBURBAN IL 604

27 OCT 2018 PM 9 L

USA

OCT 22 2018

FCL 2125079

Andrew R. Wheeler, Acting Administrator
U.S. Environmental Protection Agency
Office of the Administrator
Mail Code 1101A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

20460-

ED_002408_00016532-00003

Appointment

From: Rodrick, Christian [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6515DBE46DAE466DA53C8A3AA3BE8CC2-RODRICK, CH]
Sent: 12/12/2018 3:36:19 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]
CC: Rodrick, Christian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6515dbe46dae466da53c8a3aa3be8cc2-Rodrick, Ch]

Subject: RESCHEDULING: Call w/ Samantha Warren (Rep Foster)
Location: Call in: Personal Phone / Ex. 6 Conference ID: Personal Phone / Ex. 6

Start: 12/12/2018 9:00:00 PM
End: 12/12/2018 9:30:00 PM
Show Time As: Tentative

From: "Warren, Samantha" <Samantha.Warren@mail.house.gov>
Date: November 29, 2018 at 4:11:53 PM CST
To: "'woods.clint@epa.gov'" <woods.clint@epa.gov>
Subject: Questions from Congressman Foster

Hi Clint,

Thanks so much to you and Administrator Wheeler for coming in to talk with us about Sterigenics. Congressman Foster had a few follow-up questions. Happy to speak with a relevant technical expert.

Assuming a linear dose-response, which I understand can be either pessimistic or optimistic:
1) Based on the industrial exposure data, roughly how many PPM-hours of EtO exposure are required to generate one case of cancer (best guess, without safety factors)?
2) How many PPM-hours of exposure have been generated by Sterigenics, based on the measured concentrations in the neighborhood, and the population of the neighborhood, and the years of operation? (Using the average of the observed concentrations at representative distances, not the worst-case measurements).
3) Therefore, what is the most likely number of excess cancer cases we should expect in the neighborhood, and reasonable upper and lower bounds on that estimate?

Samantha R. Warren
Legslative Director
U.S. Rep. Bill Foster (IL-11)
1224 Longworth House Office Building
Washington, DC 20515
P: (202) 225-3515
www.foster.house.gov

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 3/1/2019 6:26:12 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: FW: Med Tech Intelligence: CDRH Warns of Potential Device Shortage with Shutdown of Sterigenics Facility in Illinois

FYI

From: Smith, Darcie
Sent: Friday, March 01, 2019 12:33 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Mckelvey, Laura <Mckelvey.Laura@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>
Subject: FW: Med Tech Intelligence: CDRH Warns of Potential Device Shortage with Shutdown of Sterigenics Facility in Illinois

From: Singer, Joshua
Sent: Friday, March 01, 2019 10:04 AM
To: Kelley, Jeff <kelley.jeff@epa.gov>; Rowan, Anne <rowan.anne@epa.gov>; Deamer, Eileen <deamer.eileen@epa.gov>; Nam, Ed <nam.ed@epa.gov>; Furey, Eileen <furey.eileen@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Cain, Alexis <cain.alexis@epa.gov>
Cc: Rountree, Jillian <Rountree.Jillian@epa.gov>
Subject: Med Tech Intelligence: CDRH Warns of Potential Device Shortage with Shutdown of Sterigenics Facility in Illinois

FYI. (CDRH is FDA's Center for Devices and Radiological Health.)

https://www.medtechintelligence.com/news_article/cdrh-warns-of-potential-device-shortage-with-shutdown-of-sterigenics-facility-in-illinois/

CDRH Warns of Potential Device Shortage with Shutdown of Sterigenics Facility in Illinois

By Maria Fontanazza
No Comments

According to the FDA, more than 90% of products sterilized at the facility are medical devices.

Following the Seal Order issued by the Illinois EPA to shutdown Sterigenics operations on February 15, CDRH is alerting medical device manufacturers that there may be a potential impact to device supply. The problem surrounds the shutdown of the Sterigenics facility in Willowbrook, Illinois, which sterilizes products using ethylene oxide (EtO). The Illinois EPA found alarming levels of EtO emissions in the surrounding residential and commercial areas—"2.1 micrograms per meter3 and 9.1 micrograms per meter3, respectively"—according to a news release from the EPA. These emissions have been a significant cause for concern for some time, as discussed in a recent article in the *Chicago Tribune*. EtO is an EPA-classified carcinogen and its emissions have

been linked to cancer—most specifically lymphoma, leukemia, and stomach and breast cancer, according to the National Cancer Institute.

How does the Sterigenics facility shutdown affect medical device manufacturers? Approximately 90% of the products sterilized at this particular facility are medical devices, according to the FDA. Although the agency is unaware of medical device shortages connected to this issue, it "believes that more than 100 manufacturers and hundreds of devices may be affected," according to an FDA statement. It is contacting manufacturers who may be affected by the Sterigenics Willowbrook facility shutdown. CDRH has advised that PMA holders who are affected and plan to use a different facility for product sterilization submit a 180-day site change supplement. 510(k) holders with the same intentions generally do not need to submit a new 510(k), the agency states. In addition, if device manufacturers anticipate a potential device supply shortage, they are urged to report the shortage or supply issue to FDA.

How is Sterigenics responding? The company has called the Illinois EPA's actions "indefensible", stating that it is compliance with all state permits and regulations. "Unilaterally preventing a business that is operating in compliance with all state permits and regulations from carrying out its vital function sets a dangerous precedent. The Illinois EPA's decision will place the health and lives of thousands of patients who rely on the critical medical products sterilized at Willowbrook at risk," according to a Sterigenics statement released on February 15. Sterigenics has released several statements in defense of the recent developments affecting the company facility. In response to an email sent by CBS Chicago investigative reporter Dave Savini, the company called the EPA's air sampling "flawed" and stated that people living in Willowbrook have been misinformed for months about how Sterigenics uses EtO to sterilize medical devices. "EO is the only method approved by the Food and Drug Administration ("FDA") to sterilize millions of critical medical devices. Without sterilization of these devices, individuals needing medical care would face life-threatening infection. By complying with and going above and beyond what the regulations require, the Sterigenics Willowbrook facility safely uses EO and provides a vital service to patients in Illinois and across the country," according to the Sterigenics statement dated February 1.

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 9/26/2018 3:04:29 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Re: Today's Meeting

Thanks.

Sent from my iPhone

On Sep 26, 2018, at 10:50 AM, Woods, Clint <woods.clint@epa.gov> wrote:

> Senior staff from OAQPS by video (Mike Koerber & Kelly Rimer) and I think David Harlow, our Senior Counsel is attending as well.
>
> ---
>
> **From:** Tom Roberts [mailto:tcr@vnf.com]
> **Sent:** Wednesday, September 26, 2018 9:46 AM
> **To:** Woods, Clint <woods.clint@epa.gov>
> **Subject:** Today's Meeting
>
> Clint – any chance you can tell me who beside Bill and you will be in our meeting today?
>
> Also, if you have not seen it already, you may want to ask the Administrator's office for a letter from AdvaMed (the leading trade association for medical device, diagnostic products, etc. whose members rely upon EO sterilization). Advamed sent a letter Monday to Acting Administrator Wheeler laying out the ramifications to the medical industry if the Sterigenics Willowbrook facility is shut down.
>
> See you at 1:00.
>
> Thank you.
>
> **Tom Roberts | Partner**
> **VanNess Feldman LLP**
> 1050 Thomas Jefferson Street, NW
> Washington, DC 20007
> (202) 298-1930 (o) | (202) 365-7750 (c) | tcr@vnf.com | vnf.com
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Message

From: Wayland, Richard [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D69F0A870909402EBD66847003AA6437-WAYLAND, CHET]
Sent: 10/23/2018 2:01:58 PM
To: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]
CC: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; Weinstock, Lewis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=df30e068efb24a24b35d63be0596ad9b-LWEINS02]; Fox, Tyler [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=021c57f288da44738d9dea325aadad85-TFOX]
Subject: Re: Sterigenics US LLC

Mike

Wednesday morning is out for me as I am presiding over the meeting that morning here in Dallas. I could do this afternoon later in the day. They are also planning to send me their questions hopefully before the call.

Chet

Richard A. "Chet" Wayland
Sent from my iPhone

On Oct 23, 2018, at 8:53 AM, Koerber, Mike <Koerber.Mike@epa.gov> wrote:

> Okay.
>
> Chet, Lew - can you do the state call this afternoon or Wednesday morning?
>
> Sent from my iPhone
>
> On Oct 23, 2018, at 9:44 AM, Woods, Clint <woods.clint@epa.gov> wrote:
>
> Mike & Chet,
>
> **Deliberative Process / Ex. 5**
>
> Clint Woods
> Deputy Assistant Administrator
> Office of Air and Radiation, U.S. EPA
> 202.564.6562
>
> **From:** Koerber, Mike
> **Sent:** Tuesday, October 23, 2018 9:35 AM
> **To:** Wayland, Richard <Wayland.Richard@epa.gov>; Woods, Clint

<woods.clint@epa.gov>
Cc: Rimer, Kelly <Rimer.Kelly@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>; Fox, Tyler <Fox.Tyler@epa.gov>
Subject: RE: Sterigenics US LLC

Deliberative Process / Ex. 5

Mike

From: Wayland, Richard
Sent: Monday, October 22, 2018 7:55 AM
To: Woods, Clint <woods.clint@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>
Cc: Rimer, Kelly <Rimer.Kelly@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>; Fox, Tyler <Fox.Tyler@epa.gov>
Subject: FW: Sterigenics US LLC

Clint,

Just heard back from John Kim, Chief Legal Counsel for IL EPA. They received the 1-pager we sent them and still would like a conversation with us. He specifically is asking for availability this week and whether we are ok with IL Attorney General being on that call or not. I am on travel most of this week at the E-Enterprise 2018 Conference in Dallas, but I can easily hop on a call along with some of our key modeling and monitoring folks if we're ok having the follow up call. Please let me know if you're comfortable with us moving forward and whether we are ok with the IL AG participating or not. They offered ot talk with us either way (with or without).

Thanks
Chet

Richard A. "Chet" Wayland | Director | Air Quality Assessment Division - Mail Code C304-02 | Office of Air Quality Planning & Standards | U.S. Environmental Protection Agency | Research Triangle Park, NC 27711 | Desk: 919-541-4603 | Cell: 919-606-0548 |

From: Kim, John J. [mailto:John.J.Kim@Illinois.gov]
Sent: Thursday, October 11, 2018 2:25 PM
To: Wayland, Richard <Wayland.Richard@epa.gov>
Subject: Sterigenics US LLC

Thank you for taking time to speak with me on the phone today. To recap, my request was for a phone call with you or your staff so that interested government representatives in Illinois (from the Illinois EPA and the Illinois Attorney General's Office) can better understand what the scope and parameters of modeling to be done based on recent stack test results from the Sterigenics facility in Willowbrook, Illinois.

We are interested in learning about what goals are being pursued, estimates of timelines, relation of modeling to ambient air modeling, and related subjects. This would help greatly with the State's efforts to effectively respond to the conditions at the Sterigenics facility in an appropriate manner.

I look forward to hearing from you.

John K.

- -

John J. Kim
Chief Legal Counsel
Illinois Environmental Protection Agency
Division of Legal Counsel
1021 North Grand Avenue, East
P.O. Box 19276
Springfield, IL 62794-9276
217.785.8628
217.782.9807 (Fax)
E-mail: john.j.kim@illinois.gov

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Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 12/12/2018 1:56:40 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: RE: Draft revision to EtO language

Thanks

From: Woods, Clint
Sent: Wednesday, December 12, 2018 8:56 AM
To: Koerber, Mike <Koerber.Mike@epa.gov>
Subject: Re: Draft revision to EtO language

Thanks for heads up - Spoke to her late yesterday. Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

On Dec 11, 2018, at 4:51 PM, Koerber, Mike <Koerber.Mike@epa.gov> wrote:

> Clint – Just a heads up that you might get a call from Brittany about the EtO language on pages 52-53. Recall, you and I worked on this language in early November.
>
> Mike

> **From:** French, Chuck
> **Sent:** Tuesday, December 11, 2018 4:06 PM
> **To:** South, Peter <South.Peter@epa.gov>
> **Cc:** Cozzie, David <Cozzie.David@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Topham, Nathan <Topham.Nathan@epa.gov>
> **Subject:** FW: Draft revision to EtO language
>
> Hi Pete,
>
> Deliberative Process / Ex. 5
>
> Let me know if you have questions.
>
> Thanks!
>
> Chuck

> **From:** Topham, Nathan
> **Sent:** Tuesday, December 11, 2018 1:16 PM
> **To:** French, Chuck <French.Chuck@epa.gov>
> **Cc:** Peffers, Mel <Peffers.Mel@epa.gov>; Tierney, Jan <tierney.jan@epa.gov>; Benner, Tim

<Benner.Tim@epa.gov>; Shrager, Brian <Shrager.Brian@epa.gov>
Subject: Draft revision to EtO language

Hey Chuck,

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

IL Delegation Elected Officials and Staffers

Senator Durbin
- Clarisol Duque (clarisol_duque@durbin.senate.gov)
- Jasmine Hunt (jasmine_hunt@durbin.senate.gov)
- Tran Nguyen (Tran_Nguyen@durbin.senate.gov)

Senator Duckworth
- David Applegate (david_applegate@duckworth.senate.gov)
- Radha Adhar (Radha_adhar@duckworth.senate.gov)

Representative Foster
- Hilary Denk (Hilary.Denk@mail.house.gov)
- Gary Timmins (Gary.Timmins@mail.house.gov)
- Samantha Warren (Samantha.warren@mail.house.gov)... Samantha is on leave at the moment, but I think it is safe to keep her on the updates unless Foster's office says otherwise

Representative Roskam
- Joe Fawell (Joe.Fawell@mail.house.gov)
- Lee Campuzano (lee.campuzano@mail.house.gov)
- Hannah Chargin (hannah.chargin@mail.house.gov)

Representative Lipinski
- Joel Creswell (joel.creswell@mail.house.gov)
- Brian Oszakiewski (brian.oszakiewski@mail.house.gov)

Governor Bruce Rauner
- Sam Pfister (sam.pfister@illinois.gov)
- Lise Spacapan (Lise.T.Spacapan@illinois.gov)
- Patty Schuh (patty.schuh@illinois.gov)

State Senator
- John F. Curran, IL Senate District 41 senatorcurran@gmail.com

State Representative
- Jim Durkin, IL House District 82 durkin@ilhousegop.org or repdurkin@hotmail.com

DuPage County
- Dan Cronin, County Chairman chairman@dupage.org
- Greg Hart, County Board Member greg.hart@dupageco.org

Mayor of Willowbrook
- Frank Trilla ftrilla@willowbrook.il.us

Mayor of Burr Ridge
- Mickey Straub Mickey@MayorMickey.com
- Evan Walter, Asst to VA, EWalter@burr-ridge.gov
- J. Douglas Pollock, Village Administrator dpollock@burr-ridge.gov

Mayor of Darien

- Kathy Weaver kweaver@darienil.gov
- Byron Vana, City Administrator bvana@darienil.gov

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Congress of the United States
House of Representatives
Washington, DC 20515–1303

COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE

COMMITTEE ON SCIENCE, SPACE, AND TECHNOLOGY
RESEARCH AND TECHNOLOGY, RANKING MEMBER

October 16, 2018

Regional Administrator Cathy Stepp
U.S. Environmental Protection Agency
Region 5
77 W Jackson Blvd.
Chicago, IL 60604-3590

Dear Regional Administrator Stepp:

I write to express frustration at the slow pace of the Environmental Protection Agency's (EPA's) response to public concern about ethylene oxide emissions from the Sterigenics facility in Willowbrook, IL and to request that the Agency accelerate its plans to conduct air quality monitoring in the surrounding communities.

In a September 21, 2018 letter to Acting Administrator Wheeler, I requested that EPA move swiftly to conduct ambient air monitoring around the Sterigenics facility. In a response dated September 27, 2018, Assistant Administrator for Air and Radiation Wehrum wrote that EPA intends to conduct ambient air monitoring in the near future. More than two weeks later, my office has learned that EPA has not yet set a date to conduct ambient air monitoring. I learned further that EPA does not plan to conduct such monitoring until after it receives the full results of an emissions test conducted at Sterigenics on September 20-21 and updates its air toxics model calculations using the new data, a process that could take several more weeks.

Given the nature of the potential health consequences of ethylene oxide exposure and the level of public concern, the delay in ambient air monitoring around Sterigenics and the lack of a clear timeline is unacceptable. Both the villages of Willowbrook and Burr Ridge, responding to their residents' reasonable demands for timely information, have made plans to conduct their own ambient air monitoring.

I understand that measuring ethylene oxide in ambient air is challenging, especially at the low concentrations known to trigger increased human health risk, and that in an effort to generate the best exposure estimates, EPA plans to base its selection of air monitoring locations on modeling that incorporates the latest Sterigenics data. However, in light of the urgent need for updated monitoring data, EPA should move forward with ambient monitoring as soon as possible. It is possible to select locations based on existing modeling data and estimates of how pollutant distribution will change based on the preliminary data Sterigenics has already released. Beginning monitoring now with near-complete modeling is preferable to waiting possibly several more weeks for complete modeling.

In addition to moving forward expeditiously with your own air monitoring, I request that you make your staff and scientists available to assist the villages of Willowbrook and Burr Ridge,

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CHICAGO, IL 60638
(312) 886-0481
(773) 767-9395 FAX

5210 WEST 95TH STREET #104
OAK LAWN, IL 60453
(708) 424-0853
(708) 424-1855 FAX

222 EAST 9TH STREET #109
LOCKPORT, IL 60441
(815) 838-1990
(815) 838-1993 FAX

14700 SOUTH RAVINIA AVENUE
ORLAND PARK, IL 60462
(708) 403-4379
(708) 403-5963 FAX

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and any other interested local government, in planning and conducting their own air quality studies. The Village of Willowbrook has already made such a request in a letter to EPA Office of Air Quality Associate Director of Policy Koerber, dated October 11, 2018. Assisting and coordinating with local governments on monitoring efforts is likely to improve the usefulness of the data collected by all parties and to provide a better estimate of the public health threat.

In your reply to this letter, I request that you please include the date that EPA plans to begin collecting ambient air samples for ethylene oxide monitoring around the Sterigenics facility, as well as details of your efforts to assist and coordinate with local governments. Please do not hesitate to contact me or Joel Creswell in my Washington, DC office at 202-225-5701 or joel.creswell@mail.house.gov with questions or to discuss this matter further.

Sincerely,

Daniel W. Lipinski
Member of Congress

Cc: Alec Messina, Director, Illinois Environmental Protection Agency
Mark Johnson, Director, Agency for Toxic Substances and Disease Registry, Region 5
Frank Trilla, Mayor, Village of Willowbrook, Illinois
Mickey Straub, Mayor, Village of Burr Ridge, Illinois

Message

From: DeLuca, Isabel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0B021C30CBEE4637A7C7CA683E5E044A-IDELUCA]
Sent: 9/26/2018 12:34:13 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Millett, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c067caa6c93544f78c26ab08cc567d27-Millett, John]
Subject: FW: AIR POLLUTION: Ill. Dems seek answers on EPA website document removal -- Wednesday, September 26, 2018 -- www.eenews.net

And this. (Sorry for not sending in digest format!)

https://www.eenews.net/eedaily/2018/09/26/stories/1060099727

Ill. Dems seek answers on EPA website document removal

Sean Reilly, E&E News reporter
Published: Wednesday, September 26, 2018

Three Illinois lawmakers are pressing EPA to explain why a document accompanying a report on air quality in a Chicago suburb was "abruptly removed" from an agency website.

"We request an explanation for why this decision was made, and who made the decision," Sen. Tammy Duckworth, Senate Minority Whip Dick Durbin and Rep. Bill Foster said in a letter to acting EPA chief Andrew Wheeler and Region 5 Administrator Cathy Stepp released yesterday.

All three lawmakers are Democrats; they also asked EPA to conduct air quality tests near a plant in the Willowbrook area run by Sterigenics, a company that provides sterilization services.

Asked for comment, EPA spokesman John Konkus said in an email that the agency would respond to the letter "through the proper channels."

According to the lawmakers, the document in question "was intended to provide context" to a report by the Agency for Toxic Substances and Disease Registry, a branch of the Health and Human Services Department.

That report concluded that ambient air concentrations of ethylene oxide, a chemical used at the plant, could pose an elevated cancer risk for residents and people working near the facility.

"The lack of context has led to confusion, anxiety and hardship on both the part of the community and Sterigenics," the letter said.

Aides to the three lawmakers could not be reached late yesterday for more details on the document.

At a public meeting late last month, hundreds of angry residents called for the plant to be closed, at least temporarily, the *Chicago Tribune* reported. Sterigenics says that it has recently reduced ethylene oxide emissions by more than 90 percent, according to the story.

The American Chemistry Council has also petitioned EPA to revisit its assessment of dangers posed by ethylene oxide (*Greenwire*, Sept. 25).

Message

From: Crist, Greg [GCrist@AdvaMed.org]
Sent: 3/5/2019 1:40:43 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Call yesterday
Attachments: ATT00001.txt; 11 10 2014 ltr -Aaron Yeow.pdf; AdvaMed EPA EtO Letter.pdf; EO issue brief- FINAL.docx

Clint,
Thanks for your time yesterday. Very helpful. I welcome the oppty to share what challenges my industry faces on the public health impact as this EtO issue continues to unfold.

Attached are two letters – one sent in 2014 with regard to the IRIS and industry concerns there. We stand by those still today. And second, another letter sent to Administrator Wheeler last year regarding Sterigenics and supply-chain concerns.

Finally, I attach a 2-page issue brief that seeks to capture a brief picture of what industry faces.

Thanks again. greg

Greg Crist
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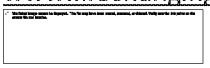

Message

From: DeLuca, Isabel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0B021C30CBEE4637A7C7CA683E5E044A-IDELUCA]
Sent: 9/26/2018 12:33:16 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Millett, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c067caa6c93544f78c26ab08cc567d27-Millett, John]
Subject: FW: The urgent Sterigenics question in DuPage: How much cancer risk? - Chicago Tribune

Another article on the Willowbrook facility…

From: Kelley, Jeff
Sent: Wednesday, September 26, 2018 8:23 AM
To: Stepp, Cathy <stepp.cathy@epa.gov>; Thiede, Kurt <thiede.kurt@epa.gov>; Payne, James <payne.james@epa.gov>
Cc: Nam, Ed <nam.ed@epa.gov>; Rowan, Anne <rowan.anne@epa.gov>; Singer, Joshua <Singer.Joshua@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>
Subject: The urgent Sterigenics question in DuPage: How much cancer risk? - Chicago Tribune

http://www.chicagotribune.com/news/opinion/editorials/ct-edit-sterigenics-cancer-risk-willowbrook-20180925-story.html

The urgent Sterigenics question in DuPage: How much cancer risk?

Editorial Board

"Cancer Alley." That's what Lousianans call a stretch of the Mississippi River Valley between Baton Rouge and New Orleans where chemical plants have been spewing pollution for years. Near one of those plants, the risk for developing cancer from toxic air pollution is the highest in the country, according to the U.S. Environmental Protection Agency.

Does the western Chicago suburb of Willowbrook have its own cancer peril? Residents in that DuPage County community and in neighboring suburbs want to know. They deserve to know, as quickly as possible.

The focus of residents' concern is Sterigenics International, a global company that sterilizes medical instruments, pharmaceutical drugs and food, the Tribune's Michael Hawthorne has reported. Willowbrook is one of 16 cities in which Sterigenics operates. The work the company does involves use of ethylene oxide, a chemical that has been on the federal government's list of carcinogens since 1985.

The U.S. EPA regularly assesses cancer risks from air pollution. It maintains a National Air Toxics Assessment, which red flags areas in the country where more investigation into the impact of air toxins is warranted. Most of the census tracts flagged in the assessment are in Louisiana's "Cancer Alley." Seven of them are in DuPage County, near the Sterigenics plant.

That understandably worries people in southeast DuPage County and nearby areas. More than 19,200 people live within a mile radius of the plant. Four schools and a day care center also are located within that radius. Some people have organized protests outside the plant and demanded it move if it continues to release ethylene oxide into the air. "Even if they stop tomorrow, there are going to be repercussions for our community for years, if not decades," T.J. Kelleher, who lives within a mile of the plant, told Hawthorne. His wife died of pancreatic cancer in February.

Officials at Sterigenics say that in July they installed state-of-the-art emissions control equipment that will reduce ethylene oxide emissions by 90 percent. And on its website, the company says the body naturally produces ethylene oxide: "There is far more (ethylene oxide) internally produced within our own bodies than the risk level stated in the EPA's … risk assessment."

What's at issue, however, are amounts of ethylene oxide in the air that could prove harmful — not trace amounts generated within the human body. In May, U.S. EPA officials collected air samples in southeast DuPage County communities. Based on that data, federal health officials concluded that the cancer risk from breathing in ethylene oxide in the area could be "up to 6,400 per million, or more than 6 cases of cancer for every 1,000 people," Hawthorne wrote.

Peter Orris, an occupational and environmental medicine researcher at the University of Illinois at Chicago, called that statistic "just staggering."

Federal health officials, the Illinois attorney general's office and U.S. Sens. Dick Durbin and Tammy Duckworth say there's a clear need for much more robust testing around the plant: a long-term air monitoring effort in residential areas by the U.S. EPA and Sterigenics. That's a reasonable request, and one that should be acted on as urgently as possible. Here's why:

The first must-take step here is to understand the scope and intensity of the risk over time. Yet the testing done in May gave only a snapshot of the problem. Long-term air monitoring would provide a much more accurate picture, and it would tell residents of surrounding communities whether the new equipment Sterigenics installed in July has actually made a difference. That information would help regulators and other public officials decide whether to take other actions. DuPage County Board Chairman Dan Cronin and state Sen. John Curran have called for revoking the company's current state permit to operate.

The Sterigenics plant isn't isolated in some vast industrial tract. It's next to homes, parks and schools — places where children learn, play and live, communities that people have been rooted in for years.

Kelleher, of Darien, told Hawthorne, "To think the very place my wife loved, the place where we raised our children, might have killed her is devastating."

Kelleher and other residents need a clearer picture of what they're dealing with. That's not a big ask. Given the potential risks, it's mandatory.

READ MORE

Trump, Rauner have the power to shut down a toxic Willowbrook plant. Will they use it? »

Rauner EPA withholds Sterigenics records from attorney general until local Republicans intervene »

Residents outraged by EPA pollution report call for Willowbrook Sterigenics plant to close »

Join the discussion on Twitter @Trib_Ed_Board and on Facebook.

Submit a letter to the editor here or email letters@chicagotribune.com.

Jeff Kelley
Director, Office of External Communications
U.S. EPA Region 5
ph: 312-353-1159

Message

From: Eric Byer [ebyer@nacd.com]
Sent: 10/22/2018 4:21:18 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Gunasekara, Mandy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=53d1a3caa8bb4ebab8a2d28ca59b6f45-Gunasekara,]
Subject: FW: CICI Legisletter - October 22, 2018

Clint,

FYI.

Thanks,
Eric Byer
NACD

From: cici@memberclicks-mail.net <cici@memberclicks-mail.net>
Sent: Monday, October 22, 2018 12:13 PM
To: Eric Byer <ebyer@nacd.com>
Subject: CICI Legisletter - October 22, 2018

CICI

Chemical Industry Council of Illinois

Legisletter

October 22, 2018

Volume 32
Issue 16

TOTAL ETHYLENE OXIDE BAN PROPOSED, AIR PERMIT EMISSION BILL COULD SINK INDUSTRY

CICI has learned of an introduced bill which would wreak havoc on, if not obliterate, a large portion of the state's chemical industry. Anyone using Ethylene Oxide (EtO) or has an air permit to emit EtO should be dreadfully concerned. On behalf of the state's environmental community, SB 3640 has been introduced by State Senator John Curran (R-Downer's Grove) to ultimately ban the use of EtO anywhere in the state and allow any air permit to be opened up if there's a belief that any emissions could be a public health hazard.

The bill would:

- Outright ban on all uses of EtO in Illinois by 2022
- Immediately prohibit all non-medical uses of EtO
- Between now and 2022, medical sterilization with EtO would only be allowed where IEPA cannot find a suitable alternative, regardless of cost
- If no suitable alternative, EtO can be used for medical sterilization only if it is located at least 10 miles from any school or park in counties with a population above 50,000 or at least 15 miles from any school or park in counties with a population less than 50,000 people
- Requires the IEPA to immediately reevaluate and set new EtO emissions standards and regulations
- Expands the IEPA's authority to reopen any CAAPP permits where it's believed a public health hazard exists
- Expands the IEPA's authority to reopen CAAPP permits when new regulations or emissions standards relevant to CAAPP permits are issued
- Provides IEPA with emergency authority to immediately have a modified permit take effect where the agency believes emissions are endangering the public health

Attached here is a Chart of various products produced using EtO. EtO is an intermediate base chemical by which a number of other chemicals are created to manufacture a host of products. About 3% of EO is used for medical device sterilization - equipment, pharmaceuticals, gowns, gauze, etc. Over 2.1 million pieces are sterilized using EtO each day in Illinois. For many medical products, EtO is the only sterilizer allowed by the FDA.

Essentially, SB 3640 would shut down a number of major chemical and medical facilities in the state and has sent shock waves throughout the entire EtO industry. Industry strongly feels the underlying USEPA report on the risk of EtO is significantly flawed – which the industry is contesting at the federal level. ACC Request for Correction. In addition, the Ethylene Oxide Sterilization Association, has issued this EOSA Report on the flawed science behind the EPA IRIS assessment for EtO.

Obviously, there will be no shortage of industries who will oppose this legislation.

The issue of using EtO as a sterilizer, and in particular to a medical sterilization facility in Willowbrook, Illinois, will be the subject of a hearing in the House Environment and Energy Committees this Friday where we're hopeful to make the industry's case among what is assured to be a circus of folks who are absolutely convinced that emissions of EtO are the cause of numerous health problems.

CICI will report back next week after this hearing with an update on this issue.

ENVIRONMENTALISTS UNVEIL MORE OF THEIR PLANS FOR NEXT YEAR

In anticipating that JB Pritzker will be Illinois' new governor next year, the environmental community has laid out more of their plans for their endorsed candidate. Many of these initiatives are fairly

radical and will require little, if any, legislation or rule changes, instead relying on Executive Orders and other administrative actions.

- Withdraw proposed rule changes introduced for Dynegy/Vistra coal-fired electricity generation facilities immediately
- Announce a **moratorium on new high-volume hydraulic fracturing permits** until a scientific study can be completed
- Direct agencies to plan for going beyond Future Energy Jobs Act (Exelon bill) and **meet a goal of 100 percent clean energy by 2050 and reach 100% clean energy in state buildings by 2025**
- Establish a study on water rates across Illinois to determine policy or programming solutions to exorbitant and inequitable rate structures, including both municipal and private systems
- All agencies – not just environment and conservation agencies – should prioritize environmental justice, from housing to health care to **the siting of all facilities**
- **Ban the use of coal tar** and other products with high polycyclic aromatic hydrocarbon content for state agency pavement sealing projects
- **Ban the use of neonicotinoid pesticides** on state-owned land
- Strengthen the voice of the EJ Commission in the review of IEPA permits, rules, and proposed projects, as well as other matters pertaining to environmental justice within any state agency
- Study the impact of toxic materials allowed to be discharged and emitted under existing permits
- Fully fund programs that will remove lead paint from housing, daycares, and schools *(CICI Note: problematic as many proposed funding solutions involve fees on paint products)*
- Strengthen statewide rules regulating pet coke and fugitive dust emissions
- Direct Tollway to require the use of diesel particulate filters (DPFs) on diesel-powered construction equipment used on state-funded projects in Chicago and Metro East St. Louis with the goal that all DPF's should remove at least 85% of particulate matter
- Direct IEPA to develop regulations that will phase out the use of hydrofluorocarbons (HFCs)
- Use remaining VW settlement moneys on electric vehicles
- Adopted California's clean car standards and implemented more durable pollution controls on cars.
- Mandate that at least 50% of new vehicles purchased under new procurement guidelines are electric vehicles.

You can read the full report here: IEC Report

CICI is incredibly concerned about many of these proposals and will definitely have our work cut out for us over the next four years should the IEC policy become the doctrine of environmental policy if JB Pritzker becomes our next governor.

CICI ANNUAL MEETING DECEMBER 4

CICI's Annual Meeting will be held Tuesday, December 4, 2018, at Café La Cave, located at 2777 Mannheim Rd in Des Plaines. All **CICI** members are encouraged to attend. For more information and to register, follow this link: 2018 CICI Annual Meeting

The day's events begin with registration and a continental breakfast at 8:30 a.m. followed by the General Membership and Board of Directors meeting. The election of new **CICI** board members and officers will also take place.

The Keynote Speaker for this event is **Cathy Stepp**, **Regional Administrator for USEPA Region 5**. Her responsibilities include overseeing environmental protection efforts in the Great Lakes states of Illinois, Indiana, Michigan, Minnesota, Ohio and Wisconsin, as well as 35 federally recognized tribal governments.

Previously, Ms. Stepp served as the secretary of the Wisconsin Department of Natural Resources from 2011 to 2017. As state cabinet secretary, she led the third largest state agency with about 4,000 employees and was responsible for state enforcement and protection of wildlife, fisheries, state parks, trails, forests and environmental permitting.

Ms. Stepp also served as a Wisconsin state senator from 2003 to 2007, where she represented nearly 160,000 constituents and authored and advanced legislation on regulatory reform, job creation and other issues. Prior to entering public service, Ms. Stepp owned a home-building company.

Also, CICI's Chief Executive Officer, Mark Biel, will be making a presentation to the membership on the state of Illinois' chemical industry.

After lunch, there will be an awards ceremony and a Legislative & Regulatory Affairs Committee meeting. **Please note that a separate RSVP is needed for the afternoon Legislative & Regulatory Affairs Committee Meeting.** You can e-mail Lisa Frede at lfrede@cicil.net to RSVP for the Legislative/Regulatory meeting.

Please note that the Chemical Industry Council of Illinois *Legisletter* is not intended to convey legal advice or set forth all legal requirements applicable to particular circumstances.

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This email was sent to ebyer@nacd.com by bbabcook@cicil.net

Chemical Industry Council of Illinois • 1400 E. Touhy Ave., Suite 110, Des Plaines, Illinois 60018, United States • 847-544-5995 or 217-522-5805

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Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 11/20/2018 9:53:11 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]
Subject: draft web language about EtO interference issue

Clint,
Here is some draft language for your review. We could post this soon – after we make a few heads up calls. We would like to raise this on the meeting planning call tomorrow – it will be a good opportunity to flag it for public officials. Please let me know your thoughts on that. Thanks .

DRAFT

Deliberative Process / Ex. 5

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 11/20/2018 9:25:58 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: FW: Sen Duckworth: Duckworth, Durbin, Foster & Schneider Ask FDA to Develop Safer Alternatives to Ethylene Oxide
Attachments: 18.11.20 - Letter to FDA re Ethylene Oxide - Duckworth Durbin Foster Schneider.pdf

Clint – thought you guys would be interested in this.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

Duckworth, Durbin, Foster & Schneider Ask FDA to Develop Safer Alternatives to Ethylene Oxide
Ethylene Oxide Emissions Have Been Linked to Increased Risk of Cancer in Neighboring Communities
Senator Duckworth
20 November 2018

[WASHINGTON, D.C.] – U.S. Senators Tammy Duckworth (D-IL) and Dick Durbin (D-IL), along with U.S. Representatives Bill Foster (D-IL-11) and Brad Schneider (D-IL-10), wrote to the U.S. Food and Drug Administration (FDA) today asking the agency to convene an interagency task force to examine alternatives to ethylene oxide, a cancer-causing chemical and known carcinogen that is used to sterilize medical equipment at facilities and hospitals. The Members of Congress emphasized how current safety standards for ethylene oxide are woefully inadequate and urged the FDA to immediately begin investigating alternatives.

"The public health threat of ethylene oxide is real," the Members of Congress wrote. "Even at low levels, ethylene oxide is dangerous to public health. It is critical that FDA begin investigating alternatives to the ethylene oxide sterilization process and prioritize swift adoption of safer methods and substances. Americans should not be forced to choose between sterile medical equipment and increased cancer risks."

Ethylene oxide is classified by the Environmental Protection Agency (EPA) as a known carcinogen, but current EPA safety standards have not been updated in more than a decade and do not appear to be protective of public health, allowing facilities to continue to endanger communities across the country. For instance, Sterigenics, a facility in Willowbrook, Illinois has pumped ethylene oxide into the air for more than 30 years. The community surrounding that facility has the second highest risk of cancer of any community in the country.

As a result, Duckworth, Durbin, Foster and Schneider have urged EPA Acting Administrator Andrew Wheeler to update the safety standards around ethylene oxide and to assess ethylene oxide exposure nationwide. Duckworth and Durbin have also written to the Occupational Safety and Health Administration (OSHA) requesting the agency do more to protect American workers from ethylene oxide and explore alternatives for sterilization.

In addition, Duckworth, Durbin and Foster have asked the EPA and Sterigenics to test local air quality for harmful ethylene oxide emissions after the facility installed new pollution controls this summer and make their results available to the general public, prompting the EPA to begin testing air quality, but they have yet to release those results publicly. The three have also asked the EPA Inspector General to investigate if EPA complied with all requirements and protocols when it intentionally withheld critical health information from the public about the cancer risks posed by Sterigenics – and they've asked the EPA to fund DuPage County public health efforts. Meanwhile, Durbin, Duckworth and Schneider have asked the EPA to perform updated air sampling and modeling studies to determine the cancer risks at two additional facilities in Lake County, Illinois, that release ethylene oxide emissions.

A copy of the letter the Members of Congress sent to the FDA today is available online here.

Congress of the United States

Washington, DC 20510

November 20, 2018

VIA ELECTRONIC DELIVERY

The Honorable Scott Gottlieb, M.D.
Commissioner
U.S. Food and Drug Administration
U.S. Department of Health and Human Services
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Commissioner Gottlieb:

We are writing to request that the U.S. Food and Drug Administration (FDA) convene an interagency task force to examine sterilization alternatives to ethylene oxide (EtO), a known carcinogen that is used at facilities and hospitals to sterilize medical equipment.

The public health threat of EtO is real. In June 2018, the Agency for Toxic Substances and Disease Registry (ATSDR) published a report indicating that the community in Willowbrook, Illinois, faces an increased cancer risk as a result of a nearby facility that uses EtO to sterilize medical equipment. However, our concern is not limited to Illinois. There are additional similar facilities throughout the United States that may be threatening other communities.

The U.S. Environmental Protection Agency's (EPA) failure to protect the public health by effectively updating its EtO permitting regulations made the problem worse. Despite the troubling ATSDR report, the Willowbrook facility technically was apparently in compliance with EPA's ineffective permitting requirements. Yet, even if EPA strengthens its regulations, the reality will remain that even at low levels, EtO is dangerous to public health.

That is why it is critical that FDA begin investigating alternatives to the EtO sterilization process and prioritize swift adoption of safer methods and substances. Americans should not be forced to choose between sterile medical equipment and increased cancer risks. We are hopeful that the dedicated men and women of FDA and throughout the scientific community, can work together to develop a safer alternative method of sterilizing equipment.

Sincerely,

Tammy Duckworth
United States Senator

Richard J. Durbin
United States Senator

Bradley S. Schneider
United States Representative

Bill Foster
United States Representative

Appointment

From: Grantham, Nancy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=12A3C2ED7158417FB0BB1B1B72A8CFB0-GRANTHAM, NANCY]
Sent: 11/20/2018 8:34:03 PM
To: Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Konkus, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=555471b2baa6419e8e141696f4577062-Konkus, Joh]

Subject: Call to discuss press strategy for Willowbrook community meeting on November 29
Location: Call in #: Personal Email / Ex. 6

Start: 11/20/2018 10:30:00 PM
End: 11/20/2018 11:00:00 PM
Show Time As: Tentative

Message

From: Wayland, Richard [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D69F0A870909402EBD66847003AA6437-WAYLAND, CHET]
Sent: 10/14/2018 5:43:47 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; Tsirigotis, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d19c179f3ccb4fadb48e3ae85563f132-PTSIRIGO]; Weinstock, Lewis [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=df30e068efb24a24b35d63be0596ad9b-LWEINS02]
Subject: EtO sampling plan for Sterigenics
Attachments: Sampling Plan - EtO - Sterigenics Willowbrook - Clean v2.docx; ATT00001.htm

Clint

Attached is our latest plan for ambient monitoring around the Sterigenics facility in Willowbrook. We have

Deliberative Process / Ex. 5

OAQPS.

Thanks
Chet

Richard A. "Chet" Wayland
Sent from my iPhone

Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 11/20/2018 4:24:52 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Re: Please review - additional text for web

Thanks!

Sent from my iPhone

On Nov 20, 2018, at 11:24 AM, Woods, Clint <woods.clint@epa.gov> wrote:

> This is good - Thanks. Will review meeting materials
>
> On Nov 19, 2018, at 5:26 PM, Davis, Alison <Davis.Alison@epa.gov> wrote:
>
> > This would be added to our information about monitoring. Let me know if you're OK with it. Thanks.

Deliberative Process / Ex. 5

Message

From: Karen J. Ayala [kayala@dupagehealth.org]
Sent: 10/12/2018 3:10:33 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]
Subject: RE: Request for Formal Recommendations

Clint,
Thank you so much for the response....perfectly timed for my meeting! I will look forward to the information next week—Thanks again, Karen

Karen J. Ayala
Executive Director
DuPage County Health Department
Phone: (630) 221-7401
Email: kayala@dupagehealth.org

From: Woods, Clint <woods.clint@epa.gov>
Sent: Friday, October 12, 2018 10:08 AM
To: Karen J. Ayala <kayala@dupagehealth.org>
Cc: Davis, Alison <Davis.Alison@epa.gov>
Subject: Re: Request for Formal Recommendations

Karen,

Please excuse our delay - We expect to have some preliminary information about what we know (and don't know) regarding potential groundwater effects from our Office of Water experts early next week. Thanks!

Clint

On Oct 10, 2018, at 4:23 PM, Karen J. Ayala <kayala@dupagehealth.org> wrote:

> Clint,
> I am checking in to determine the status of this request. I very much appreciate the work being done to assist us in addressing significant/growing resident concerns re: groundwater testing and potential contamination. We are holding an internal meeting on Friday morning to discuss next steps, but clearly are relying upon your agency's expertise to provide the direction. If there is any opportunity to get even preliminary guidance from you, that would help—thanks again, Karen
>
> **Karen J. Ayala**
> Executive Director
> DuPage County Health Department
> Phone: (630) 221-7401
> Email: kayala@dupagehealth.org
>
> ---
>
> **From:** Woods, Clint <woods.clint@epa.gov>
> **Sent:** Friday, October 5, 2018 2:14 PM
> **To:** Karen J. Ayala <kayala@dupagehealth.org>
> **Cc:** Davis, Alison <Davis.Alison@epa.gov>
> **Subject:** RE: Request for Formal Recommendations

Karen,

Thanks so much for DuPage County's recent request for recommendations for groundwater concerns in Willowbrook, IL. I wanted to make sure to acknowledge receipt of this request and let you know that we have gathered a group of EPA experts from the Agency's Office of Water (Office of Ground Water and Drinking Water), Office of Air and Radiation (Office of Air Quality Planning and Standards) and Region 5 to quickly assess the scientific information available in regard to any potential groundwater impacts in Willowbrook. We hope to be in touch with more information shortly.

Clint Woods
Deputy Assistant Administrator
Office of Air and Radiation, U.S. EPA
202.564.6562

For up to date news and information on the DuPage County Health Department, please follow us on Twitter @DuPageHD and become a fan on Facebook.

DUPAGE COUNTY
HEALTH DEPARTMENT

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DuPage County Health Department

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DUPAGE COUNTY
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DuPage County Health Department

Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 11/20/2018 4:03:04 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: DeLuca, Isabel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b021c30cbee4637a7c7ca683e5e044a-IDELUCA]
Subject: Please review -- Meeting announcement and materials for your review
Attachments: Willowbrook Meeting Announcement.for clint review.docx; Ambient Monitoring and Stack TestingV2.docx; Ethylene Oxide Basics.docx; Ethylene Oxide in Willowbrook IL V2.docx; NATA 2014 Fact Sheet.docx; NATA Overview (Hawethorne).docx; Regulating Air Pollution V2.docx

Flag: Flag for follow up

Clint – please review the attached. We need to get the meeting announcement out today – we are being asked for updates.

The other materials are handouts and have been requested by the community. We may have a few technical tweaks, but they are close to ready.

Deliberative Process / Ex. 5

Thanks.

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 10/3/2018 2:04:23 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Sterigenics / Willowbrook -- Governor Rauner
Attachments: sterigenics - rauner release --referral to ag 10.02.pdf; Sterigenics Statement to IL EPA 10.02.pdf

Clint – this is an example of the message Sterigenics sent to relevant Congressional staff yesterday regarding Governor Rauner's actions. Per our discussion last night, the Rauner and Sterigenics' press releases are attached. Thanks.

Tom Roberts
(202) 365-7750 (c) | tcr@vnf.com

From: Tom Roberts
Sent: Tuesday, October 02, 2018 2:21 PM
To: 'Adhar, Radha (Duckworth) (Radha_Adhar@duckworth.senate.gov)'
Cc: 'dbinninger@freeborn.com'
Subject: RE: Sterigenics / Willowbrook -- Stack Test Results

Radha – I assume you are aware of this, but wanted to ensure that was the case and provide you with Sterigenics' position.

Earlier today Governor Rauner issued a press release advising that he has asked the Illinois Attorney General to initiate an emergency proceeding against Sterigenics to shut down the Willowbrook facility. *See the attached press release.*

Sterigenics does not believe this action is warranted and agrees with the statement in EPA's September 27 letter to Senator Duckworth that, "...the air concentrations of ethylene oxide are not high enough to cause immediate harm to health for the people in and around Willowbrook." *Please see the attached Sterigenics press release.*

Not only is there no health based justification for an immediate shut down, doing so also would have a substantial impact on the health care industry in the Chicago area. Because the medical sterilization industry operates on a "just in time" basis, a shutdown would have a significant negative impact on the supply and availability of medical devices and equipment. The Willowbrook facility, like many ethylene oxide sterilization process plants, is the sole sterilization facility for a number of medical device types. A disruption in production at this facility would halt sterilization of those products and result in an abrupt stop in the supply chain for those devices. This would not be a temporary or short term interruption.

A large majority of the devices sterilized at Willowbrook are done so pursuant to the FDA license issued for each product / device. In fact, some FDA licenses specifically require that the product /device be sterilized at the Willowbrook facility. In the event of a shutdown, identifying a different facility, validating sterilization cycles at that facility and acquiring the appropriate authorization to use that alternative facility likely will take months. This cessation could result in limited access to critical medical technology for millions of patients and lead to poorer health outcomes.

To provide a sense of the impact, the following is a sample of some products that we sterilize at Willowbrook with the average daily volume of units sterilized:

- 1,000 cardiac tamponades (used in Heart Surgery)
- 1,000 knee implants

- 1,500 procedural kits (For various medical procedures such as routine doctors exams, blood draws, and surgery)
- 16,000 catheters
- 11,000 syringes for injections used in radiology diagnosis
- An unknown quantity (thousands) of diabetes monitoring & care kits, renal care products, neurosurgical devices, and respiratory care products.

I hope this is helpful information. If you have any questions at all, please contact me.

Thank you for your time and consideration.

Tom Roberts | Partner
Van Ness Feldman LLP

1050 Thomas Jefferson Street, NW
Washington, DC 20007
(202) 298-1930 (o) | (202) 365-7750 (c) | tcr@vnf.com | vnf.com

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NEWS RELEASE

Illinois Environmental Protection Agency
1021 North Grand Avenue East, P.O. Box 19276
Springfield, Illinois 62794-9276
Phone: 217/782-3397

FOR IMMEDIATE RELEASE
October 2, 2018

Contact: Kim Biggs
Kim.Biggs@Illinois.gov
217-558-1536

Illinois EPA Refers Sterigenics to Attorney General for Enforcement

Agency Seeks Immediate Injunctive Relief Against Company

SPRINGFIELD – Illinois Environmental Protection Agency Director Alec Messina has referred an enforcement action to the Illinois Attorney General's Office against Sterigenics US, LLC (Sterigenics) based on the findings of the Agency for Toxic Substances and Disease Registry (ATSDR) in its Letter Health Consultation and on information provided by U.S. EPA. The Agency is seeking an order enjoining Sterigenics from continuing operations that result in any emissions of ethylene oxide either until a complete review of additional modeling and risk assessment is completed by U.S. EPA or until U.S. EPA otherwise assures the community that resumed operations would not present an elevated health risk.

Sterigenics is a commercial sterilizer that primarily uses ethylene oxide (EtO) to sterilize medical equipment. It operates in two buildings at 7775 Quincy Street and 830 Midway in Willowbrook.

As part of the process for assessing new cancer risk assumptions nationwide, U.S. EPA chose to evaluate the implications of the recently updated Integrated Risk Information System (IRIS) at the Sterigenics facility in Willowbrook. U.S. EPA provided that data to ATSDR, and ATSDR concluded, in an August 21, 2018 report, that "if measured and modeled data represent typical EtO ambient concentrations in the air, *an elevated cancer risk exists* for residents and off-site workers in the Willowbrook community surrounding the Sterigenics facility."

On September 28, 2018, Illinois officials and local community representatives met with U.S. EPA to discuss the status of U.S. EPA's ongoing evaluation and testing at Sterigenics. While progress has been made, it is evident that additional weeks or months will pass before U.S. EPA will be in a position to provide an updated risk assessment and propose any resulting changes to relevant regulations. The lack of certainty continues to raise public concern. In addition, the September 28 meeting increased that concern due to information discussed. In particular, the August 21 ATSDR report referenced a "30-fold increase in cancer potency," but at the September 28 meeting, U.S. EPA referenced a 60-fold increase.

In the referral, the Illinois EPA cited the findings of the ATSDR Letter Health Consultation and information provided at the September 28 meeting with U.S. EPA. In addition to the Agency requesting an order enjoining Sterigenics from continuing operations, the Agency requests, as an alternative, the Attorney General's Office pursue a violation of Section 9(a) of the Illinois Environmental Protection Act. Illinois EPA also requests Sterigenics pursue EtO emission limits for the Willowbrook facility that would be memorialized in an amended permit.

###

Statement from Sterigenics in Response to Illinois EPA Referral to Attorney General

Chicago, IL October 2, 2018 - As communicated in our press release of September 27, independent third-party testing designed and monitored by the Illinois EPA and the U.S. EPA was conducted less than two weeks ago. The results demonstrate that emission levels on our recent emission control upgrades are below detection limits on state-of-the-art approved testing equipment.

In fact, the test results confirmed the view expressed by U.S. Agency for Toxic Substances and Disease Registry (ATSDR) in August that there is "not [an] immediate health threat or...an emergency situation" in Willowbrook. In addition, in a letter to Governor Rauner on September 27, E.P.A. Assistant Administrator for the Office of Air and Radiation Bill Wehrum states, "...air concentrations of EO...are not an immediate harm to health to the people in and around Willowbrook."

Sterigenics states, "We agree with the ATSDR's clarification and Assistant Administrator Wehrum's letter. Unfortunately, the community has been exposed to a lot of inaccurate and misinterpreted information and we are committed to getting the real facts to residents who, based on what they have been hearing and reading, are understandably concerned.

The company continued, "We have always been well under IEPA and EPA requirements but are committed to additional monitoring and testing to reassure residents of their safety. Shutting down our facilities will seriously undermine the ability of hospitals in Illinois and across the country to proceed with scheduled surgeries and put lives at risk. We are committed to doing the right thing by our community but closing facilities that emit limited, regulated EO emissions is not the right answer. If necessary, we will take all appropriate actions to protect the hospitals and patients that depend on our facility. The singling out of our facility among those in Illinois, who now emit more EO than Sterigenics Willowbrook, is inevitably short-sighted."

The implications for our country's healthcare and medical device industries and the millions of patients that depend on them are enormous. Shutting down the Willowbrook facility -- and all the others in Illinois that emit any EO -- will create serious risk for hospitals and medical device manufacturers that depend on EO all in the name of safety for the healthcare industry. This action by Illinois is not justified by the facts and the EPA has communicated directly to the Governor that Sterigenics Willowbrook does not present an imminent threat to public health. We urge reconsideration of the Governor's ill-considered action, which is based on a misuse of ATSDR data, which the ATSDR has already publically acknowledged.

For additional information on this matter visit www.sterigenicswillowbrook.com

2015 Spring Road Ste 650 Oak Brook, IL 60523
630.928.1700 | sterigenics.com

About Sterigenics: Sterigenics is a global leader in mission-critical sterilization solutions and expert advisory services. Its 1,600 engineers, scientists and safety specialists provide deep expertise in gamma, EtO, Ebeam and X-ray sterilization technologies for the medical device, pharmaceutical, food and commercial safety, and high-performance materials industries. Its network of 47 facilities in 13 countries put its services close to customers' production and distribution points, ensuring it is the "point of safe" for customers around the world.

About Sotera Health: Sotera Health LLC, along with its business entities, is the world's leading, fully integrated protector of global health. With over 500 years of combined scientific expertise, the company ensures the safety of healthcare by providing mission-critical services to the medical device, pharmaceutical, tissue and food industries. Sotera Health operates 63 facilities in 13 countries. The company has over 2,600 employees globally and touches the lives of more than 180 million people around the world each year. Sotera Health serves more than 5,000 customers worldwide, including 75 of the top 100 medical device manufacturers.

Sotera Health goes to market through its three best-in-class companies – Nelson Labs™, Nordion® and Sterigenics® – with the mission of ensuring the safety of healthcare each and every day. Nelson Labs offers microbiological and analytical testing and expert advisory services

to assist customers in developing and maintaining sterilization solutions in medical devices, tissue/implantable products, and the pharmaceutical and biologics fields. Nordion is the world's largest provider of Cobalt-60 used in the gamma sterilization process. Sterigenics provides comprehensive contract sterilization and ionization solutions for the medical device, pharmaceutical, food safety and high-performance materials industries.

Learn more about **Sotera Health** at soterahealth.com, about **Nelson Labs** at nelsonlabs.com, about **Nordion** at nordion.com and about **Sterigenics** at sterigenics.com.

###

For more information, please contact:

Kristin A. Gibbs
Chief Marketing Officer
kgibbs@soterahealth.com

Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 11/23/2018 9:16:36 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]
Subject: RE: PLEASE REVIEW -- FW: Drafts - Invites for elected officials

Thanks.

From: Woods, Clint
Sent: Friday, November 23, 2018 4:16 PM
To: Davis, Alison <Davis.Alison@epa.gov>
Cc: Koerber, Mike <Koerber.Mike@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>
Subject: Re: PLEASE REVIEW -- FW: Drafts - Invites for elected officials

Good- Thanks!

On Nov 23, 2018, at 3:00 PM, Davis, Alison <Davis.Alison@epa.gov> wrote:

> Hi Clint,
> Here are draft invitations for elected officials meetings. Jack would like to get these out. Would you review and let me know if you have edits?
>
> <DRAFT-LakeCounty elected invite 11-28.docx>
>
> <DRAFT-willowbrook elected invite 11-29.docx>

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 2/25/2019 8:57:46 PM
To: Newton, Cheryl [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ae08c2f1c2304a61bf7c01de62f35dbf-Cenewton]
CC: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: RE: Sterigenics Articles

Not yet.

Clint – let me know if you have any new information. Thanks.

From: Newton, Cheryl
Sent: Monday, February 25, 2019 3:10 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>
Subject: FW: Sterigenics Articles

Hi Mike – FYI

Also, any update on the Illinois AG request? We are concerned about timing/responsiveness. Thanks

---

From: Nelson, Leverett
Sent: Monday, February 25, 2019 12:00 PM
To: Newton, Cheryl <Newton.Cheryl@epa.gov>; Nam, Ed <nam.ed@epa.gov>; Kelley, Jeff <kelley.jeff@epa.gov>; Lynn, Jennifer <Lynn.Jennifer@epa.gov>
Subject: Sterigenics Articles

FYI.

Another worker with allegations regarding chemical handling and disposal:
https://chicago.cbslocal.com/2019/02/22/sterigenics-willowbrook-ethylene-oxide/

More generally:

A Tale of Two Toxic Cities The EPA's Bungled Response to an Air Pollution Crisis Exposes a Toxic Racial Divide

Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 9/26/2018 9:32:41 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: DeLuca, Isabel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b021c30cbee4637a7c7ca683e5e044a-IDELUCA]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Millett, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c067caa6c93544f78c26ab08cc567d27-Millett, John]; Bremer, Kristen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b7ad6f4a11064ef08cb03aec9dc8e892-KBREMER]
Subject: RE: draft letter EtO Willowbrook
Attachments: EtO Willowbrook response Draft 4..docx

Here you go. Let us know if you have questions

From: Woods, Clint
Sent: Wednesday, September 26, 2018 5:27 PM
To: Davis, Alison <Davis.Alison@epa.gov>
Cc: DeLuca, Isabel <DeLuca.Isabel@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Millett, John <Millett.John@epa.gov>
Subject: Re: draft letter EtO Willowbrook

Any additional feedback on this front? Thanks!

On Sep 26, 2018, at 2:11 PM, Davis, Alison <Davis.Alison@epa.gov> wrote:

> Got it. We'll look. Will circle with Mike as soon as he is out of meeting.
>
> ---
>
> **From:** DeLuca, Isabel
> **Sent:** Wednesday, September 26, 2018 2:06 PM
> **To:** Woods, Clint <woods.Clint@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Millett, John <Millett.John@epa.gov>
> **Subject:** draft letter EtO Willowbrook
> **Importance:** High
>
> Hi Clint and team,
> OCIR has asked us to develop a draft narrative response to recent Congressional inquiries about EtO levels in Willowbrook, and requests for ambient air monitoring. The hope is that we could send ASAP, post online, and issue a press release to point to the letter.
>
> Attached is a rough first draft. I am sending for concurrent review because of the tight timeline. OAQPS will need to review for accuracy and consistency with past statements (e.g. on canister vs stack testing). Alison—there is a placeholder where I hope you can drop in the previously approved language on our national approach.

Clint—if I veered from the direction we discussed earlier, please jump in. If these are the right bones, then you can do a closer look once OAQPS has weighed in.

Personal Matters / Ex. 6

Thanks,
Isabel

Isabel DeLuca
Office of Air and Radiation, US EPA
(202) 343-9247

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 11/23/2018 8:06:16 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Fwd: PLEASE REVIEW -- FW: Drafts - Invites for elected officials
Attachments: DRAFT-LakeCounty elected invite 11-28.docx; ATT00001.htm; DRAFT-willowbrook elected invite 11-29.docx; ATT00002.htm

Clint - Not sure about your travel schedule, **Deliberative Process / Ex. 5** Let me know your plans when you can. Thanks.

Sent from my iPhone

Begin forwarded message:

> **From:** "Davis, Alison" <Davis.Alison@epa.gov>
> **Date:** November 23, 2018 at 3:00:23 PM EST
> **To:** "Woods, Clint" <woods.clint@epa.gov>
> **Cc:** "Koerber, Mike" <Koerber.Mike@epa.gov>, "Rimer, Kelly" <Rimer.Kelly@epa.gov>
> **Subject: PLEASE REVIEW -- FW: Drafts - Invites for elected officials**
>
> Hi Clint,
> Here are draft invitations for elected officials meetings. Jack would like to get these out. Would you review and let me know if you have edits?

DANIEL LIPINSKI
3RD DISTRICT, ILLINOIS
www.lipinski.house.gov

2346 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-1303
(202) 225-5701
(202) 225-1012 FAX
TOLL FREE FROM IL (866) 822-5701

Congress of the United States
House of Representatives
Washington, DC 20515–1303

COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE

COMMITTEE ON SCIENCE, SPACE, AND TECHNOLOGY
RESEARCH AND TECHNOLOGY, RANKING MEMBER

February 25, 2019

The Honorable Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20004

Dear Acting Administrator Wheeler:

We write to request that you use your authority under the Clean Air Act to protect the public in Willowbrook, Illinois and surrounding communities from substantial endangerment resulting from ethylene oxide emitted by the Sterigenics Facility in Willowbrook. As you are aware, the State of Illinois issued a Seal Order on Friday, February 15, 2019, preventing any further ethylene oxide sterilization activity until further notice. While this action is protecting public health for the time being, Sterigenics is challenging the order in the courts and it may be overturned in the coming days or weeks. Should the order be overturned, we request that you use your emergency powers under the Clean Air Act to prevent the company from conducting further ethylene oxide sterilization unless the company makes significant improvements to its emissions controls and/or operating procedures and presents evidence that it will no longer contribute to elevated ethylene oxide levels in ambient air outside the facility. Such improvements could be determined through an emissions audit by a third-party, unbiased engineering firm, such as was requested in a letter to you, signed by me and several of my Illinois Delegation colleagues, dated February 13, 2019.

Although Sterigenics is in compliance with its Clean Air Act Permit for ethylene oxide emissions, that permit is deficient. It was issued in 2015 under a hazardous air pollution regulation that was statutorily overdue for revision at the time. The permit also does not take into account the U.S. Environmental Protection Agency's (EPA's) 2016 update to its carcinogenic risk estimate for ethylene oxide, which demonstrated that the chemical presents a much greater cancer risk than previously thought. These facts, along with ambient air monitoring data released by the EPA and the Village of Willowbrook showing significantly elevated ethylene oxide levels near the Sterigenics facility, demonstrate that the facility presents an imminent and substantial endangerment to public health. It is therefore well within your authority to use your emergency powers under the Clean Air Act to prevent the facility from operating unless significant changes are made.

We appreciate your timely attention to this request. Should you have any questions, please do not hesitate to contact Joel Creswell in my office at 202-225-5701 or joel.creswell@mail.house.gov.

Sincerely,

Daniel W. Lipinski
Member of Congress

6245 SOUTH ARCHER AVENUE
CHICAGO, IL 60638
(312) 886-0481
(773) 767-8395 FAX

5210 WEST 95TH STREET #104
OAK LAWN, IL 60453
(708) 424-0863
(708) 424-1855 FAX

222 EAST 9TH STREET #109
LOCKPORT, IL 60441
(815) 838-1990
(815) 838-1993 FAX

14700 SOUTH RAVINIA AVENUE
ORLAND PARK, IL 60462
(708) 403-4379
(708) 403-5963 FAX

PRINTED ON RECYCLED PAPER

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 11/20/2018 12:42:40 AM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]
Subject: Fwd: DELIBERATIVE Willowbrook community meeting agenda draft 11.13.18 (003).docx
Attachments: Willowbrook community meeting agenda draft 11.13.18 (003).docx; ATT00001.htm

Flag: Flag for follow up

Clint - Not sure if you've received this draft agenda. Please take a look and let us know what you think. In particular, see the opening item Deliberative Process / Ex. 5

Mike

Sent from my iPhone

Begin forwarded message:

From: "Davis, Alison" <Davis.Alison@epa.gov>
Date: November 19, 2018 at 9:33:10 AM EST
To: "Koerber, Mike" <Koerber.Mike@epa.gov>
Subject: DELIBERATIVE Willowbrook community meeting agenda draft 11.13.18 (003).docx

Mike – Here is the draft agenda as it stands now. It has some redline strikeout, as you'll see. After some welcomes (including Bill), you and Kelly would do a "setting the state" piece.

Deliberative Process / Ex. 5

Can you move forward with this version of the agenda to get a decision on the video? Let me know; if we can't do it, they will need to come up with a different plan.

Thanks.
Alison

From: Cortelyou-Lee, Jan
Sent: Monday, November 19, 2018 9:02 AM
To: Davis, Alison <Davis.Alison@epa.gov>
Subject: FW: Willowbrook community meeting agenda draft 11.13.18 (003).docx

Message

From: Millett, John [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C067CAA6C93544F78C26AB08CC567D27-MILLETT, JOHN]
Sent: 10/3/2018 12:32:37 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Fwd: In about-face, Gov. Bruce Rauner calls for Sterigenics shutdown after weeks of downplaying cancer risks - Chicago Tribune

Sent from my iPhone

Begin forwarded message:

From: "Grantham, Nancy" <Grantham.Nancy@epa.gov>
Date: October 3, 2018 at 8:09:56 AM EDT
To: "Davis, Matthew" <Davis.Matthew@epa.gov>, "Haman, Patricia" <Haman.Patricia@epa.gov>, "Davis, Alison" <Davis.Alison@epa.gov>, "Koerber, Mike" <Koerber.Mike@epa.gov>, "Richardson, RobinH" <Richardson.RobinH@epa.gov>, "Bowles, Jack" <Bowles.Jack@epa.gov>, "Thundiyil, Karen" <Thundiyil.Karen@epa.gov>, "Millett, John" <Millett.John@epa.gov>, "DeLuca, Isabel" <DeLuca.Isabel@epa.gov>
Subject: FW: In about-face, Gov. Bruce Rauner calls for Sterigenics shutdown after weeks of downplaying cancer risks - Chicago Tribune

Nancy Grantham
Office of Public Affairs
US Environmental Protection Agency
202-564-6879 (desk)
202-253-7056 (mobile)

From: Kelley, Jeff
Sent: Wednesday, October 03, 2018 8:08 AM
To: Thiede, Kurt <thiede.kurt@epa.gov>; Stepp, Cathy <stepp.cathy@epa.gov>; Payne, James <payne.james@epa.gov>
Cc: Nam, Ed <nam.ed@epa.gov>; Rowan, Anne <rowan.anne@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>
Subject: In about-face, Gov. Bruce Rauner calls for Sterigenics shutdown after weeks of downplaying cancer risks - Chicago Tribune

http://www.chicagotribune.com/news/local/breaking/ct-met-bruce-rauner-sterigenics-shutdown-20181002-story.html

In about-face, Gov. Bruce Rauner calls for Sterigenics shutdown after weeks of downplaying cancer risks

Michael Hawthorne

After spending the past month downplaying cancer risks from toxic air pollution in west suburban Willowbrook, Gov. Bruce Rauner on Tuesday joined a chorus of elected officials calling for the shutdown of a Sterigenics International facility co-owned by his former private equity firm.

Fellow Republicans from DuPage County have been clamoring for Rauner to take more aggressive action against the company, which for more than three decades has used highly potent ethylene oxide gas to sterilize medical instruments, pharmaceutical drugs and food near densely populated neighborhoods and several schools.

As recently as Friday, the most the Republican governor would say about Sterigenics was that he had instructed the Illinois Environmental Protection Agency to launch an investigation. But Rauner changed course after the weekend, ordered his staff to refer the case to Illinois Attorney General Lisa Madigan, the state's chief lawyer, then urged the Democrat to seek a court order that would close the Willowbrook facility until a separate federal investigation "assures the community that resumed operations would not present an elevated health risk."

Rauner's sudden reversal comes as local politicians, many of whom like the governor are on the Nov. 6 ballot, face a fury of complaints about a federal report that revealed unusually high cancer risks from ethylene oxide pollution in traditionally Republican communities near Sterigenics. Citizen groups that quickly organized against the company garnered even more attention when Burr Ridge resident Andrea Thome and her husband, former Chicago White Sox slugger Jim Thome, added their voices to the anti-Sterigenics movement.

"There is a level of anger in the community that I've never seen before," said longtime state Rep. Jim Durkin of Darien, the House Republican leader and one of several DuPage County officials calling for Sterigenics to be shut down. "This area is populated by young families who are moving here from the city. I know people within a half-mile of the

facility who feel they aren't getting any answers and they don't feel anybody is standing up on their behalf."

The Tribune previously reported that quick action is unlikely for a variety of reasons, including steps the Rauner administration took before and after the Willowbrook cancer report was released to the public in late August.

Nearly two months earlier, the Illinois EPA responded to the then-secret report by quietly giving Sterigenics a permit to voluntarily install new pollution-control equipment, making it more difficult for authorities to pursue legal action against the company unless it can be proved that the fix has failed to eliminate health risks from ethylene oxide pollution.

Rauner appointees later refused to provide Madigan's office with key documents about the Willowbrook facility, required the attorney general's staff to request the records under the Freedom of Information Act and delayed providing the information until after the Tribune inquired about the dispute on Sept. 20. Even now, Madigan said, the state can't make an effective case against Sterigenics without more air quality monitoring in surrounding neighborhoods, expert analysis of the results and other information that only the state or federal EPA can provide.

"We are prepared to move forward in court and have told IEPA what evidence is necessary to shut the site down," Madigan said. "IEPA has not provided any evidence, but we will immediately evaluate any information the agency provides."

With Election Day just a few weeks away, locally elected officials have repeatedly urged state and federal regulators to reassure the public they are safe. Rauner, along with top Trump administration officials at the U.S. Environmental Protection Agency, have stressed that there is no evidence Sterigenics poses the type of immediate threats seen in some work settings. But the company has been releasing ethylene oxide into surrounding communities since the early 1980s, federal records show, and the health risks involve diseases that can take years to develop, including breast cancer, leukemia and lymphoma.

Based on air samples collected in May, an arm of the federal Centers for Disease Control and Prevention determined the cancer risks from breathing ethylene oxide pollution in southeast DuPage communities could be orders of magnitude higher than initially estimated: up to 6,400 per million, or more than six cases of cancer for every 1,000 people. The U.S. EPA generally targets polluters when local cancer risks exceed 100 in a million.

The pre-election political stakes are high enough that the Trump administration weighed in on the issue last week, dispatching a presidential appointee in charge of the EPA's air division to promise the agency will conduct the type of neighborhood air monitoring that Madigan and others have been calling for during the past month.

Sterigenics said a controlled test of emissions, conducted in late September by consultants hired by the company, failed to detect any ethylene oxide leaving its pair of buildings in Willowbrook.

"We are committed to doing the right thing by our community but closing facilities that emit limited, regulated (ethylene oxide) emissions is not the right answer," the company said in a statement, calling Rauner's latest reaction "ill-considered." "If necessary, we will take all appropriate actions to protect the hospitals and patients that depend on our facility."

Rauner's ties to the company date to 2011, when a private equity firm he co-founded bought Sterigenics for $675 million and quickly expanded its operations. The governor's most recent state ethics statement, filed in May, shows he retains an interest in the fund used to buy the sterilization company, which in 2015 sold a majority stake to another private equity firm.

On Friday morning, Rauner told radio station WBEZ he no longer has a stake in Sterigenics. Spokespeople for his campaign and government office later told the Tribune that Rauner sold his interest as part of the 2015 deal but have not produced documents showing the transaction took place.

"We will get the truth about what has been emitted so far," Rauner told the radio station, "and what needs to change in the future."

mhawthorne@chicagotribune.com

Twitter @scribeguy

MORE COVERAGE

After weeks of public outrage about Sterigenics, Trump EPA to test air in surrounding neighborhoods »

Rauner EPA withholds Sterigenics records from attorney general until local Republicans intervene »

High cancer risk in southeast DuPage County linked to company co-owned by Rauner's former firm »

Jeff Kelley
Director, Office of External Communications
U.S. EPA Region 5
ph: 312-353-1159

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 9/26/2018 8:18:42 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Re: Today's Meeting

Clint - thanks for the meeting. We thought it was productive. If you have 2 minutes could you give me a call on my cell Personal Phone / Ex. 6 for a follow up question? Thanks again.

Sent from my iPhone

On Sep 26, 2018, at 10:50 AM, Woods, Clint <woods.clint@epa.gov> wrote:

> Senior staff from OAQPS by video (Mike Koerber & Kelly Rimer) and I think David Harlow, our Senior Counsel is attending as well.
>
> **From:** Tom Roberts [mailto:tcr@vnf.com]
> **Sent:** Wednesday, September 26, 2018 9:46 AM
> **To:** Woods, Clint <woods.clint@epa.gov>
> **Subject:** Today's Meeting
>
> Clint – any chance you can tell me who beside Bill and you will be in our meeting today?
>
> Also, if you have not seen it already, you may want to ask the Administrator's office for a letter from AdvaMed (the leading trade association for medical device, diagnostic products, etc. whose members rely upon EO sterilization). Advamed sent a letter Monday to Acting Administrator Wheeler laying out the ramifications to the medical industry if the Sterigenics Willowbrook facility is shut down.
>
> See you at 1:00.
>
> Thank you.
>
> **Tom Roberts | Partner**
> **VanNess Feldman LLP**
> 1050 Thomas Jefferson Street, NW
> Washington, DC 20007
> (202) 298-1930 (o) | (202) 365-7750 (c) | tcr@vnf.com | vnf.com
>
> *This communication may contain information and/or metadata that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please do not read or review the content and/or metadata and do not disseminate, distribute or copy this communication. Anyone who receives this message in error should notify the sender immediately by telephone (202-298-1800) or by return e-mail and delete it from his or her computer.*

Message

From: Morning Consult [reply@e.morningconsult.com]
Sent: 3/5/2019 1:27:20 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Morning Consult Energy: Government Report Shows EPA Political Staff Delayed Chemical Assessments for Months

By Jacqueline Toth

Top Stories

- The U.S. Government Accountability Office said that Environmental Protection Agency political appointees delayed assessments of toxic chemicals for months in 2018 during an analysis of whether the agency's work fell in line with leaders' priorities. EPA leaders told staff in the Integrated Risk Information System program not to publish their work at the time, according to the report. (ABC News)

- The Consumer Financial Protection Bureau will take comment on a regulation that would consider private lenders who participate in the Property Assessed Clean Energy loan program as more traditional mortgage lenders, following requests for action from banking groups, consumer advocates and lawmakers. Under the new rule, PACE lenders may need to ensure borrowers can repay the loans, which are given for energy-efficiency home improvements. (The Wall Street Journal)

- China suspended customs clearance for Tesla Inc.'s Model 3 cars, according to a financial publication, which said Shanghai's customs authority found irregularities across 1,600 imports of the electric sedan and issued a March 1 notice to Tesla on the matter. The authority has also reportedly asked port inspectors to increase scrutiny of other Tesla imports. (Reuters)

Chart Review

Elon Musk Blindsided Tesla Staff With Store-Closing Plans
Bloomberg

Events Calendar (All Times Local)

03/05/2019

Utility Management Conference

Americas Sulphur Cap 2020 Conference

GAIN-EPRI-NEI Advanced Fuels Workshop

Transmission Summit East

Department of Energy's Bioenergy Technologies Office 2019 Project Peer Review	
Power and Energy Automation Conference	
S&P Global Platts 32nd Annual Power and Gas M&A Symposium	
Wilson Center Outlook for Mexico's Energy Sector under the AMLO Administration	9:00 am
Energy Trading Institute 2019 Conference	9:30 am
National Press Club Review of the 2018 Hurricane Season & Forecast for the Future	10:00 am
Information Technology and Innovation Foundation	10:00 am
Senate Clean Air and Nuclear Safety Subcommittee Hearing on States' Role in Protecting Air Quality: Principles of Cooperative Federalism	10:00 am
Senate Energy and Natural Resources Hearing to Examine the Electricity Sector in a Changing Climate	10:00 am
Politico Event: A New Roadmap for Environmental Sustainability	11:30 am
EESI Event on Beneficial Electrification Increasing Opportunities to Electrify Our Economy	2:00 pm

03/06/2019

Utility Management Conference

Transmission Summit East

GAIN-EPRI-NEI Advanced Fuels Workshop

Americas Sulphur Cap 2020 Conference

Department of Energy's Bioenergy Technologies Office 2019 Project Peer Review

Power and Energy Automation Conference	
S&P Global Platts 32nd Annual Power and Gas M&A Symposium	
NASEO 2019 U.S. Energy and Employment Launch	8:15 am
S&P Global Platts Natural Gas Technical Workshop	9:00 am
House Oversight and Reform Environment Subcommittee Hearing Examining PFAS Chemicals and their Risks	10:00 am
Senate Environment and Public Works Hearing on the Economic Benefits of Highway Infrastructure Investment and Accelerated Project Delivery	10:00 am
House Energy and Mineral Resources Subcommittee Hearing Examining the Policies and Priorities of BOEM, BSEE and the USGS	2:00 pm
House Science, Space and Technology Hearing on Maintaining U.S. Leadership in Science and Technology	2:00 pm
Resources for the Future Event on the Future of Carbon Pricing	5:30 pm

03/07/2019

Utility Management Conference	
Transmission Summit East	
Department of Energy's Bioenergy Technologies Office 2019 Project Peer Review	
Power and Energy Automation Conference	
House Appropriations Energy and Water Development and Related Agencies Hearing on Energy Workforce Opportunities and Challenges	1:00 pm

House Energy and Commerce Energy Subcommittee Hearing on Wasted Energy: DOE's Inaction on Efficiency Standards and Its Impact on Consumers and the Climate	10:00 am
House Water, Oceans, and Wildlife Subcommittee Hearing Examining the Threats to the North Atlantic Right Whale	10:00 am
House Science, Space and Technology Hearing on the Energy Water Nexus: Drier Watts and Cheaper Drops	10:00 am
Senate Energy and Natural Resources Roundtable on Issues Related to Public Lands in the Western United States	10:00 am
Energy Department Atomic Wings Lunch & Learn on Jobs in Nuclear Energy	11:30 am

03/08/2019

Utility Management Conference

Department of Energy's Bioenergy Technologies Office 2019 Project Peer Review

03/11/2019

ACEEE's 2019 Hot Water Forum

IHS Markit's CERAWeek

D.C. Energy and Environment Associations Reception 6:00 pm

03/12/2019

ACEEE's 2019 Hot Water Forum

IHS Markit's CERAWeek

Nuclear Regulatory Commission Regulatory Information Conference

View full calendar

The State of the Democratic Primary

On a daily basis, Morning Consult is surveying over 5,000 registered voters across the United States on the 2020 presidential election. Each week, we'll update this page with the latest survey data, offering an in-depth guide to how the race for the Democratic nomination is shaping up.

General

Wheeler Credits Superfund Success to Reform Efforts
Sylvia Carignan and John Herzfeld, Bloomberg BNA

The Environmental Protection Agency's Superfund task force, created by Pruitt in 2017, embarked on a two-year revamp of the program. The cleanup process can take decades for a single site, and Pruitt and Wheeler have focused on speeding that up and pushing sites toward redevelopment.

Carlos Ghosn granted bail after months in detention
Kana Inagaki and Leo Lewis, Financial Times

According to the court announcement on Tuesday, which emerged after extended deliberations, Mr Ghosn's bail was set at ¥1bn ($9m). The approval came with conditions including a ban on him travelling outside of Japan.

Republicans Who Couldn't Beat Climate Debate Now Seek to Join It
Ari Natter, Bloomberg

Representative John Shimkus once issued a forceful rejection of climate science at a congressional hearing, invoking the Bible and declaring that "Earth will end only when God declares it's time to be over."

Frustrated by EPA, states blaze ahead on PFAS
Cecelia Smith-Schoenwalder, E&E News

So far, only New Jersey has a maximum contaminant level, or MCL, for a chemical in the PFAS family.

Sterigenics Head Met Repeatedly With EPA Over Toxic Carcinogen
Amena H. Saiyid and Abby Smith, Bloomberg BNA

The head of Illinois medical sterilizer Sterigenics U.S. LLC has had at least half a dozen conversations with the EPA's top air official, as the agency considers tougher standards for ethylene oxide, a carcinogenic chemical.

Oil drops towards $65 as Libya's biggest field restarts
Alex Lawler, Reuters

Oil fell towards $65 a barrel on Tuesday, pressured by the restart of Libya's biggest oilfield and on expectations for an increase in U.S. crude inventories.

Oil and Natural Gas

Noem offers bills aimed at possible Keystone XL protests
James Nord, The Associated Press

South Dakota Gov. Kristi Noem said Monday that she's proposing a new framework for oil pipeline construction before building starts on the Keystone XL pipeline, introducing legislation that would require companies behind such projects to chip in on protest-related expenses and create a way to go after the money of those who fund destructive demonstrations.

U.S. gets $87 million for oil and gas leases in sage grouse habitat
Nichola Groom, Reuters

The U.S. government received bids for about 70 percent of the land it offered at a large oil and gas lease sale in Wyoming last week, held over the protests of conservationists who argued the area was critical habitat for wildlife, including a threatened bird.

A new battle over oil and gas drilling just broke out in Colorado
Tom DiChristopher, CNBC

Colorado drillers are gearing up for a fight after Democratic lawmakers proposed overhauling the state's oil and gas commission and reforming regulations that could create new roadblocks to fossil fuel development.

Michigan governor proposes nearly tripling the gas tax
David Eggert, The Associated Press

New Michigan Gov. Gretchen Whitmer, who campaigned on a bold promise to "fix the damn roads" in the capital of the U.S. auto industry, will propose nearly tripling the state's per-gallon fuel tax, her office said Monday.

Cheniere Deal With China Signals Country's Key Role in LNG Exports
Christopher M. Matthews, The Wall Street Journal

Cheniere Energy Inc.'s expected $18 billion deal to supply natural gas to China signals the company's growing bet on the country, and China's emergence as a top market for U.S. gas exporters.

Low LNG prices, noncommittal Asian investors hit LNG projects
Eric Yep, S&P Global Platts

A prolonged period of low LNG prices is keeping Asian buyers from committing to offtake agreements to meet future gas demand, which means that many new investment-starved gas projects may not see the light of day.

How the 2020 Democrats Learned To Love Ethanol
Michael Grunwald, Politico

Every four years, presidential candidates make pilgrimages to Iowa and preach the gospel of ethanol, the corn-based fuel that pours nearly $5 billion into the state's economy every year. This time, it looked like things might really be different.

Utilities and Infrastructure

NRG Energy reports quarterly loss
L.M. Sixel, Houston Chronicle

NRG Energy, the biggest electricity seller in Texas, narrowed its fourth quarter loss to $13 million from a $1.7 billion loss in the same period a year earlier.

Lawyer: Ex-SCANA officials 'whitewashed,' lied about defects at failed nuclear plant
John Monk, The State

SCANA executives deliberately lied to investors about the future of a doomed nuclear construction project, a lawyer representing former SCANA shareholders argued in court Monday.

Renewables

A look into Big Oil's fight against electric cars
Maxine Joselow, E&E News

Last November, oil industry representatives huddled with conservative state lawmakers at a hotel a few blocks from the White House.

Pennsylvania removes barrier to third-party EV charging station ownership
Robert Walton, Utility Dive

The Pennsylvania Public Utilities Commission (PUC) on Thursday approved tariff supplements for four FirstEnergy utilities that will clarify rules around third-party electric vehicle (EV) charging in an attempt to encourage development of charging infrastructure.

Coal

Kemmerer mine sale approved by bankruptcy judge
Heather Richards, Casper Star Tribune

A federal bankruptcy judge in Houston approved the sale of the Kemmerer mine, from bankrupt Westmoreland Coal Co. to Virginia businessman Tom Clarke, on Saturday. The company has since received approval to sell other assets, including the Colstrip mine in Montana, to its biggest creditors.

Proposal to study CCS technology at San Juan Generating Station rejected by Senate panel
Hannah Grover, Farmington Daily Times

State Sen. William Sharer, R-Farmington, said Farmington could become the center of clean coal technology if Acme Equities acquires the San Juan Generating Station and installs carbon capture and sequestration technology on the plant.

Nuclear

Seeking to shrink Bears Ears, uranium firm met with Interior before review
Jacob Holzman, Roll Call

A meeting between an Interior Department official and a company tied to mineral interests in the Bears Ears National Monument area - almost a month before President Donald Trump requested a review that

substantially reduced its boundaries - may end up in the crosshairs of House Natural Resources Chairman Raúl M. Grijalva.

Climate

EU countries allocate 59% of total CO2 allowances for 2019
Frank Watson, S&P Global Platts

EU countries have allocated a combined 445 million carbon dioxide allowances for 2019, or 59% of the eligible total, according to data released Friday by the European Commission.

The U.S. Needs to Rethink How It Warns People About Excessive Heat
Eric Roston, Bloomberg

Summertime heat advisories have one job: Warn people when extreme temperatures could be harmful to their health. By that standard, they may be failing cooler parts of the country, according to new research.

Opinions, Editorials and Perspectives

Green New Deal's overreach lends itself to mockery. But what's your climate change solution?
The Editorial Board, USA Today

The knives are definitely out for the Green New Deal. The sweeping plan to fight climate change has been called immoral, a socialist manifesto and suggestive of Nazi Germany or Stalinist Russia.

Green New Deal is unworkable and unaffordable: Sen. Barrasso
U.S. Sen. John Barrasso (R-Wyo.), USA Today

The Green New Deal would drive a stake through the heart of our nation's strong, healthy and growing economy.

Nuclear Power Is Not the Moderate Answer to Climate Change
Robinson Meyer, The Atlantic

Most Americans, as far as pollsters can tell, want the United States to honor its commitment under the Paris Agreement on climate change.

According to that pact, the United States must, by 2025, cut its carbon emissions 26 percent below their all-time peak.

The Good News About a Green New Deal
John Cassidy, The New Yorker

Last month's rollout of the Green New Deal, a fourteen-page legislative resolution, sponsored by Representative Alexandria Ocasio-Cortez and Senator Ed Markey, that called for "net-zero greenhouse gas emissions" through a ten-year "national mobilization," has sparked a good deal of controversy.

Research Reports

Assessment of extreme heat and hospitalizations to inform early warning systems
Ambarish Vaidyanathan et al., Proceedings of the National Academy of Sciences

In this study, we conduct multistate analyses, exploring associations between heat and all-cause and cause-specific hospitalizations, to inform the design and development of heat-health early warning systems. We used a two-stage analysis to estimate heat-health risk relationships between heat index and hospitalizations in 1,617 counties in the United States for 2003-2012.

This email was sent by: Morning Consult
729 15th St. NW Washington, DC, 20005, US

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Message

From: InsideEPA.com [insideepa-alerts@iwpnews.com]
Sent: 3/1/2019 12:29:08 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: The Morning Headlines from InsideEPA.com -- March 1, 2019

REDEFINING EPA: Overhauling an agency and its mission -- Complete coverage

March 1, 2019

The Weekly Focus

EPA Touts Enforcement Deference Policy But Also Eyes State 'Assists'

A year after issuing interim guidance that mandates "deference" to states in environmental enforcement, top EPA officials are touting the Trump administration's success in shifting enforcement action to the states, though they are weighing changes to the guidance even as Democrats and environmentalists continue to attack the strategy.

Latest News

Former CASAC Chair Alleges 'Procedural Irregularities' In NAAQS Reviews

A former chairman of EPA's Clean Air Scientific Advisory Committee (CASAC) is alleging "procedural irregularities" in the conduct of current panel chairman Tony Cox, charging it further undermines the credibility of the EPA's truncated process for reviewing national ambient air quality standards (NAAQS).

EPA Urges IRS To Align Tax Law Incentives With Brownfields Definition

EPA's Office of Brownfields and Land Revitalization (OBLR) is urging the Internal Revenue Service (IRS) to align definitions in a proposed rule to implement investment incentives in the 2017 Tax Cuts and Jobs Act with those in the brownfields program in order to spur redevelopment of former industrial sites.

Agencies In 'A Corner' On Using Carbon Cost In NEPA, Environmentalists Say

Environmentalists are increasingly confident they can force the Trump administration to use the social cost of carbon (SCC) metric to calculate the future climate damages of its fossil fuel extraction policies, even though the

administration remains vehemently opposed to doing so, including in ongoing litigation over a coal mine expansion.

Senate GOP Confirms Wheeler As EPA Chief, Amid Democrats' Attacks

Senate Republicans have voted to confirm Andrew Wheeler to be the Trump EPA's second permanent administrator, after the chamber's Democrats uniformly rejected the nomination while slamming the agency's rollbacks of climate and other regulations.

Daily Feed

House GOP taps Graves for select climate panel

Rep. Garret Graves (R-LA) has acknowledged the need to adapt to rising sea levels, but generally opposes policies to reduce greenhouse gases.

Lawmakers, environmentalists seek hearing on EtO analysis

"It is not proper for EPA to be requesting comment on, or considering any change in use of the health risk factor for EtO" in a proposed rule focused on the hydrochloric acid sector, environmentalists say.

Quoted: Reaction to Andrew Wheeler's confirmation

Environmentalist critics of the Trump administration blasted Wheeler's confirmation, while industry groups largely said he would offer them more regulatory certainty.

Ewire: Pelosi demurs on House vote for Green New Deal

In today's Ewire: The House Speaker says she cannot say if Democrats will "take that and pass it because we have to go through our checks and balances of it with our committee chairs and the rest."

Superfund watchdog group expected to shutter

CPEO has mainly relied on funding from EPA and the Defense Department (DOD) but those funds ran out last year, "and there is no immediate prospect for new funding."

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Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 10/2/2018 9:59:44 PM
To: Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: RE: R5 website

They're fixing right now. Will let you know when it's back up

---

From: Davis, Alison
Sent: Tuesday, October 02, 2018 5:51 PM
To: Koerber, Mike <Koerber.Mike@epa.gov>; Woods, Clint <woods.Clint@epa.gov>
Subject: RE: R5 website

Just happened that I pinged R5 on this – I think a link may have broken. I'll bug them again. Thought this had occurred this morning.

From: Koerber, Mike
Sent: Tuesday, October 02, 2018 5:49 PM
To: Woods, Clint <woods.Clint@epa.gov>
Cc: Davis, Alison <Davis.Alison@epa.gov>
Subject: Re: R5 website

Copying Alison, who can check.

Sent from my iPhone

On Oct 2, 2018, at 5:48 PM, Woods, Clint <woods.clint@epa.gov> wrote:

> Thanks for this – Have we posted the elected official letters yet?
>
> ---
>
> **From:** Koerber, Mike
> **Sent:** Tuesday, October 2, 2018 11:01 AM
> **To:** Woods, Clint <woods.clint@epa.gov>
> **Subject:** Fwd: R5 website
>
> Here is the new website
>
> Sent from my iPhone
>
> Begin forwarded message:
>
> > **From:** "Bremer, Kristen" <Bremer.Kristen@epa.gov>
> > **Date:** October 2, 2018 at 10:57:21 AM EDT
> > **To:** "Koerber, Mike" <Koerber.Mike@epa.gov>
> > **Subject: R5 website**

https://www.epa.gov/il/sterigenics-willowbrook-facility

_____

Kristen Bremer
Policy Analysis & Communications
U.S. EPA, Office of Air Quality Planning & Standards
Email: bremer.kristen@epa.gov
Phone: 919.541.9424
Cell: 919.321.7652

Message

From: InsideEPA.com [insideepa-alerts@iwpnews.com]
Sent: 11/5/2018 12:31:41 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: The Morning Headlines from InsideEPA.com -- November 5, 2018

REDEFINING EPA: Overhauling an agency and its mission -- Complete coverage

November 5, 2018

Latest News

High Court's Surprise Decision Bolsters Youths' Bid For Novel Climate Trial

In a surprise move, the Supreme Court rejected a Department of Justice (DOJ) request to halt the novel suit brought by 21 youth plaintiffs seeking to compel the government to address climate change, bolstering efforts by

the plaintiffs to go to trial in a federal district court in Oregon though they will almost certainly face continued DOJ opposition.

As Statewide Races Remain Close, GOP Critics Of EPA Appear To Fade

Key gubernatorial and Senate races remain close days before critical midterm elections, though several leading GOP critics of Obama EPA rules appear to be fading in their efforts to win higher office, including the attorneys general (AGs) of Michigan and West Virginia -- each of whom successfully sued to block EPA power plant rules.

EPA's Call For Data Sparks Fight Over Assessing NAAQS' Adverse Impacts

EPA's call for data on the adverse impacts of implementing ambient air standards is sparking a fight over how, and whether, the agency and its advisers should consider such impacts, with industry groups saying they are a vital factor while environmentalists and some states say weighing such factors in reviews of the standards is unlawful.

States, Environmentalists Oppose EPA Plan To End Air Monitoring Mandates

Several states and environmental groups are opposing EPA's plan to lift air emissions monitoring requirements first established under an obsolete Clean Air Act program, warning that eliminating the monitoring will weaken compliance with other environmental programs and risks unlawful "backsliding," or worsening of air quality.

Facing Hurdles, EPA Steps Up Push For 'Good Samaritan' Mine Cleanups

EPA and other Trump administration officials are stepping up their efforts to secure more "Good Samaritan" voluntary cleanups at abandoned mine sites that have been difficult to advance because of strict legal liability that often dissuades such voluntary parties from signing up to remediate the sites.

Industry Seeks Greater Role In ESA Review As Environmentalists Vow Suit

The mining and pesticide industries, along with state regulators, are backing a Trump administration proposed rule seeking to streamline EPA and other agencies' consultations with federal wildlife agencies on risks to listed species, with industry seeking greater involvement in reviews, though environmentalists are threatening to sue to block the changes.

Daily Feed

California, Illinois seek to join suit against EPA cement MACT

California and Illinois are backing environmentalists' lawsuit against EPA's cement air toxics rule, as the agency decides whether to grant environmental groups' request to reconsider the rule.

Democrats seek IG review of EPA's handling of Sterigenics data

The lawmakers also appear to make the case for a broad policy agenda they are urging EPA to adopt to more strictly regulate and monitor EtO releases.

Senate Democrats seek broader IG inquiry of EPA glider plan

The latest request may bolster a similar push from House Democrats, who are expected to gain control of committee chairmanships in the next Congress, boosting their leverage to conduct oversight of EPA policies.

EPA adds new drift controls as it extends dicamba approval

Environmentalists argue that EPA's two-year extension of its approval of dicamba for use on GM crops supports their pending lawsuit against the original approval.

Ewire: NRCC runs 'deeply cynical' climate ad in Curbelo race

In today's Ewire: Republicans receive the lion's share of coal and oil company campaign cash, but the party is accusing a Democratic House campaign of being "flooded with dirty coal money."

DHS' high court filing defends border wall environmental law waivers
The Department of Homeland Security says environmentalists' bid to overturn its broad authority to waive environmental laws that might limit construction of a border wall is baseless.

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Message

From: Rimer, Kelly [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=123A21A46D0E4E53A590798CDCC3FB47-KRIMER]
Sent: 11/19/2018 9:28:24 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Re: Illinois EPA Participation at Willowbrook mtg

Got it

Thank you

> On Nov 19, 2018, at 4:24 PM, Woods, Clint <woods.clint@epa.gov> wrote:
>
> Spoke to Alec Messina, their director, last week, who was 50/50 on ability to attend. Will fwd you his contact info
>
>> On Nov 19, 2018, at 4:23 PM, Rimer, Kelly <Rimer.Kelly@epa.gov> wrote:
>>
>> Clint,
>>
>> I am working to get a name of the person or people who will attend the meeting from IEPA.
>>
>> I've been trying to contact Julie Armitage. Would you happen to know who else I might try to contact ? I'm not sure Julie is in the office this week.
>>
>> Thanks for any advice,
>>
>> Kelly

Message

From: Schwab, Justin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EED0F609C0944CC2BBDB05DF3A10AADB-SCHWAB, JUS]
Sent: 1/30/2019 3:54:34 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Attachments: 19.01.29- Letter to EPA opposing RTR on HCL that undermines ETO risk assessment.pdf

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 1/29/2019 9:50:25 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: January 29 letter
Attachments: 19.01.29- Letter to EPA opposing RTR on HCL that undermines ETO risk assessment.pdf

FYI – let me know your reaction. Thanks.

From: Mckelvey, Laura
Sent: Tuesday, January 29, 2019 1:31 PM
To: EtO <EtO@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Smith, Darcie <Smith.Darcie@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>; Wilson, Holly <Wilson.Holly@epa.gov>; Long, Pam <Long.Pam@epa.gov>; Cortelyou-Lee, Jan <Cortelyou-Lee.Jan@epa.gov>; Caparoso, Jennifer <Caparoso.Jennifer@epa.gov>; Shappley, Ned <Shappley.Ned@epa.gov>; Terry, Sara <Terry.Sara@epa.gov>
Subject: FW: Help!

Heads up on this one. I think we will need a response fairly quickly.

From: Jennifer McConahy Personal Email / Ex. 6
Sent: Tuesday, January 29, 2019 1:26 PM
To: Mckelvey, Laura <Mckelvey.Laura@epa.gov>
Subject: Help!

What is happening?!

https://www.duckworth.senate.gov/imo/media/doc/19.01.29-%20Letter%20to%20EPA%20opposing%20RTR%20on%20HCL%20that%20undermines%20ETO%20risk%20assessment.pdf

Message

From: Grantham, Nancy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=12A3C2ED7158417FB0BB1B1B72A8CFB0-GRANTHAM, NANCY]
Sent: 8/27/2018 8:49:24 PM
To: Konkus, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=555471b2baa6419e8e141696f4577062-Konkus, Joh]; Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Koerber, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c513901d4fd49f9ab101a6f7a7a863e-Koerber, Mike]; Cortelyou-Lee, Jan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=75b1eec7b16e46d5b9114935fc6a771e-JCORTELY]
Subject: FW: Willowbrook meeting is now Wednesday evening

Nancy Grantham
Office of Public Affairs
US Environmental Protection Agency
202-564-6879 (desk)
202-253-7056 (mobile)

From: Kelley, Jeff
Sent: Monday, August 27, 2018 4:48 PM
To: Grantham, Nancy <Grantham.Nancy@epa.gov>
Subject: Willowbrook meeting is now Wednesday evening

Jeff Kelley
Director, Office of External Communications
U.S. EPA Region 5
ph: 312-353-1159

Message

From: Davis, Alison [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1C309F42D5D44D18A52B027BD0112778-ADAVIS06]
Sent: 11/29/2018 8:04:06 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Re: Questions from Congressman Lipinski's Constituents

Pretty sure no. Can Joel do it?

Sent from my iPhone

On Nov 29, 2018, at 2:00 PM, Woods, Clint <woods.clint@epa.gov> wrote:

> Great - Would facilitator be OK with reading Lipinski statement if we needed him to?
>
> On Nov 29, 2018, at 1:53 PM, Davis, Alison <Davis.Alison@epa.gov> wrote:
>
> > Lets circle up before you do that - I want to pass on some info from Christian
> >
> > Sent from my iPhone
> >
> > Begin forwarded message:
> >
> > **From:** "Woods, Clint" <woods.clint@epa.gov>
> > **Date:** November 29, 2018 at 1:48:10 PM CST
> > **To:** "Rodrick, Christian" <rodrick.christian@epa.gov>
> > **Cc:** "Creswell, Joel" <Joel.Creswell@mail.house.gov>, "Davis, Alison" <Davis.Alison@epa.gov>, "Mckelvey, Laura" <Mckelvey.Laura@epa.gov>, "Ashley, Jackie" <Ashley.Jackie@epa.gov>, "Haman, Patricia" <Haman.Patricia@epa.gov>, "Block, Molly" <block.molly@epa.gov>
> > **Subject: Re: Questions from Congressman Lipinski's Constituents**
> >
> > Joel,
> >
> > Thanks so much - If you have time, I'd love to touch base with you prior to the meeting. My cell is Personal Privacy / Ex. 6
> >
> > Clint
> >
> > On Nov 29, 2018, at 1:44 PM, Rodrick, Christian <rodrick.christian@epa.gov> wrote:
> >
> > > Joel,
> > >
> > > Thanks for the update. We will let the moderator know.
> > >
> > > *Christian Rodrick*
> > > *(202) 564-4828*

From: Creswell, Joel <Joel.Creswell@mail.house.gov>
Sent: Thursday, November 29, 2018 2:32 PM
To: Rodrick, Christian <rodrick.christian@epa.gov>
Cc: Davis, Alison <Davis.Alison@epa.gov>; Mckelvey, Laura <Mckelvey.Laura@epa.gov>; Ashley, Jackie <Ashley.Jackie@epa.gov>; Haman, Patricia <Haman.Patricia@epa.gov>
Subject: Re: Questions from Congressman Lipinski's Constituents

Thanks Christian. We understand that EPA may not be able to address every question, given the large number received, but would ask you to cover as many as possible.

Also, an update on Congressman Lipinski's status: it doesn't look like he will be able to make it by the beginning of the event and has asked me to read a brief prepared statement at his assigned time. He will still try to be there before the end of the event but is not planning to speak publicly.

Thanks!

Joel Creswell
Legislative Assistant
Congressman Dan Lipinski (IL-03)

On Nov 29, 2018, at 1:13 PM, Rodrick, Christian <rodrick.christian@epa.gov> wrote:

> Joel,
>
> Wanted to follow up with you on this—As I am sure you are aware, EPA has received a large number of questions for this evening's events. I wanted to make sure you knew that the questions had been received, but that you did not expect that EPA would be able to address each of the below questions, and if you or your boss had any questions following the event, we would be happy to set up a call next week to continue the conversation.
>
> Thanks, and I hope your travel to IL was safe and uneventful.
>
> *Christian Rodrick*
> *(202) 564-4828*

From: Rodrick, Christian
Sent: Thursday, November 29, 2018 9:04 AM
To: Creswell, Joel <Joel.Creswell@mail.house.gov>; EtO <EtO@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Mckelvey, Laura <Mckelvey.Laura@epa.gov>; Ashley, Jackie <Ashley.Jackie@epa.gov>; Haman, Patricia <Haman.Patricia@epa.gov>
Subject: RE: Questions from Congressman Lipinski's Constituents

Thanks Joel,

We will make sure they get submitted.

Christian Rodrick
(202) 564-4828

From: Creswell, Joel <Joel.Creswell@mail.house.gov>
Sent: Wednesday, November 28, 2018 5:58 PM
To: EtO <EtO@epa.gov>
Cc: Rodrick, Christian <rodrick.christian@epa.gov>
Subject: Questions from Congressman Lipinski's Constituents

Hello,

I'd like to submit the following list of questions on behalf of Congressman Lipinski. These have been posed by his constituents, and the Congressman would like to make sure they are addressed during the forum.

Thank you and best regards,

Joel Creswell, Ph.D.
Legislative Assistant
Congressman Daniel W. Lipinski (IL-03)
2346 Rayburn House Office Building
202-225-5701 |
joel.creswell@mail.house.gov

- What does the EPA think of the Ontario Canada standards for

ambient air concentration published in 2007 based upon their own work and review of various standards including North Carolina and California?

- What level of ambient air concentration do you PERSONALLY feel is safe and what level is being used to evaluate air in Willowbrook, Burr Ridge, Darien and Hinsdale? (Unacceptable answers include those that cites studies or include 'according to ...'). This is about PERSONALLY accountability and what you PERSONALLY feel is safe.
- Since the boiling point of EO is approximately 50 degree F and measurement being done presently in temperatures below the boiling point of EO, how is ambient air concentration going to be determined for the winter months?
- Will EPA be doing year-round tests of the ambient air forever?
- Why is Sterigenics' apparently allowed to self report their EO emissions and when are you planning on having independent reporting with community involvement in the selection?
- Sterigenics' website refers to EPA using an EO level 1,600 times lower than exposure from plant decay? They reference a World Health Organization report as the source.
- The report specifically says, "In certain plants, ethylene (a natural plant growth regulator) is degraded to ethylene oxide (Abeles & Dunn, 1985)." Additionally it states, "Quantitative estimates of production from these natural sources are not available, but emissions are expected to be negligible."

- Has the EPA done studies or are they aware of additional studies as it pertains to which plants degrade to EO and whether the emissions from these plants in fact negligible?
- Sterigenics' website refer to EPA using an EO level 19,000 times lower than the EO produce in the human body each day. They reference a report from Kirman and Hayes (neither whom are Medical Doctors) and the abstract of their report talks of an approach for derive EO within the human body based upon comparison to EO workers and smokers.
- Has the EPA (or CDC or equivalent) done a peer review of this report and what were the credentials of the peer reviewers?
- You recently announcement that you may not have measured the EO correctly. Given that you can't even measure EO which you've been regulating since the late 90's why is it allowed in a densely populated area?
- Can you confirm or deny (with data) whether there is a documented cancer cluster in the areas surrounding sterigenics? (Is there an increased incidence and/or prevalence of cancer cases within a 5 mile radius of the corporation in willowbrook as is illustrated on the NATA map?)
- What is the protocol for the old EtO assay?
- How was it developed (especially with regards to how and when it was discovered that 2-butadiene gave false positives and why it was not discovered when the assay was developed).
- What is the protocol for the new EtO assay?

- How was it developed? What testing has been done to determine what false positives or false negatives affect it?
- How long as the new EtO assay been in existence? Why was it not used to do the initial testing?
- It is my understanding that the chemical causing the false positives in the old EtO assay is 2-butadiene. What testing can be done for 2-butadiene in the area around and downwind of Sterigenics? What is the deadline for doing such testing be done? "There is no deadline." Is not an acceptable answer.
- How long has it been known that EtO is carcinogenic at much lower levels than previously understood?
- What documentation exists of when and how this was communicated to the EPA?
- Who was responsible for deciding to not develop new guidelines for it? Note that I'm looking for actual names, not just a citation of "EPA officials".
- What documentation of the decision process that resulted in not developing those new guidelines exists? When will it be made public? "I don't know" is not an acceptable answer unless it is accompanied by "but I will find out and provide those documents to the public by January 30th, 2019."
- What is the deadline for performing the new testing? What is the deadline for performing the analysis and publicly revealing the results?
- What methods are currently in place at Sterigenics to stop EtO from being emitted from the plant?
- How do they work?
- What is their efficacy?

- How are these monitored and tested to ensure that they are working properly?
- Does the EPA audit the monitoring and testing records for them?
- Does the EPA ever go on site and check those methods and machinery themselves?
- What new mechanisms and methods are being put into place?
- What are the current standards for EtO emission into the environment (as opposed to worker exposure in the facility)?
- What new standards has the EPA developed?
- Will they be based on the average of emissions over a long period of time or will emitting a large amount over a short period of time also comprise a violation of the standard?
- Where in the approval process are those new standards?
- When can we expect to see them adopted?
- What are all the different provisions for public comment or other influence in that process?
- What are the penalties for violating these standards?
- Do they hold any individuals in the company involved personally responsible?
- How are they enforced?
- What action can private individuals take to force their enforcement?
- What can be done to actually close a company that violates a standard?
- What can be done to halt Sterigenics' use of EtO until such time as new standards are developed?
- What can be done to halt Sterigenics' use of EtO, period?

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 9/11/2018 1:55:32 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: FW: Insisht from Tongiht's Willowbrook Board Mtg
Attachments: ATT00001.txt

Flag: Flag for follow up

Clint - thought you would be interested in this. We recognize that these are only second / third hand reports, but if the Mayor actually was told this it is another indication of how out of control ATSDR and Region 5 are. Also, note the name of the Facebook page on which this is posted.

I would appreciate it if we could connect sometime today. I am participating in a briefing that Sterigenics is providing for the District staff of Senator Duckworth, Senator Durbin and Representative Foster this morning my schedule is quite flexible after 12:00. Would really like to talk to you.

Thanks, Clint.

Tom Roberts
Partner
202.365.7750

Subject: Insisht from Tongiht's Willowbrook Board Mtg

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Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 10/19/2018 11:49:17 AM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: FW: Final Stack Test Reports (Email #1 of 2)
Attachments: BV Test Report CL Signed 10182018.pdf; WB1 Test Report and Attachments 10182018.pdf

FYI – We finally received the stack test reports on Thursday afternoon.

From: Hoffman, Kathy [mailto:KHoffman@sterigenics.com]
Sent: Thursday, October 18, 2018 6:06 PM
To: Rimer, Kelly <Rimer.Kelly@epa.gov>
Cc: Koerber, Mike <Koerber.Mike@epa.gov>
Subject: FW: Final Stack Test Reports (Email #1 of 2)

Kelly:

We finalized the test reports today. Attached are the final stack test reports.

Let me know if you have any questions or need any further information.

Regards,
Kathy

From: Hoffman, Kathy
Sent: Thursday, October 18, 2018 4:24 PM
To: Armitage, Julie (Julie.Armitage@Illinois.gov); Nam, Ed (nam.ed@epa.gov)
Subject: Final Stack Test Reports (Email #1 of 2)

We have finalized the Willowbrook back vent test reports. See attached letter and reports.

Thank you for your assistance with this project and the compliance testing.

Let me know if you have any questions.

Regards,
Kathy

Kathleen Hoffman
Senior Vice President - Global Environmental, Health & Safety and Technical Services
Sterigenics, A Sotera Health Company
2015 Spring Road, Suite 650
Oak Brook, IL 60523
Office: 630.928.1758
khoffman@sterigenics.com

Sterigenics®
A Sotera Health company

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Message

From: Ringel, Aaron [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1654BDC951284A6D899A418A89FB0ABF-RINGEL, AAR]
Sent: 9/24/2018 1:37:34 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: Fwd: Letter from Congressman Lipinski
Attachments: EPA Wheeler - EtO Emissions at Sterigenics.pdf; ATT00001.htm

FYI.

Sent from my iPhone

Begin forwarded message:

> **From:** "Davis, Matthew" <Davis.Matthew@epa.gov>
> **Date:** September 24, 2018 at 9:27:55 AM EDT
> **To:** "Lyons, Troy" <lyons.troy@epa.gov>, "Ringel, Aaron" <ringel.aaron@epa.gov>, "Rodrick, Christian" <rodrick.christian@epa.gov>
> **Cc:** "Haman, Patricia" <Haman.Patricia@epa.gov>, "Richardson, RobinH" <Richardson.RobinH@epa.gov>, "Deamer, Eileen" <deamer.eileen@epa.gov>
> **Subject: Fwd: Letter from Congressman Lipinski**
>
> FYI- new letter on Sterigenics ethylene oxide emissions. This one asks us to shut plant down if can't show it's not a threat to nearby community. I'll get it entered into CMS and coordinate with region 5.
> Thanks,
> Matthew
>
> Begin forwarded message:
>
> > **From:** "Weiss, AdamC" <AdamC.Weiss@mail.house.gov>
> > **Date:** September 21, 2018 at 5:52:42 PM EDT
> > **To:** "Davis.Matthew@epa.gov" <Davis.Matthew@epa.gov>
> > **Cc:** "Creswell, Joel" <Joel.Creswell@mail.house.gov>
> > **Subject: Letter from Congressman Lipinski**
> >
> > Dear Mr. Davis,
> >
> > Please see an advanced copy of the attached letter from Congressman Daniel Lipinski (IL-03) to Acting Administrator Andrew Wheeler. A paper copy has been mailed but we wanted to provide an electronic version ahead of time. Please confirm receipt of this email and its contents.
> >
> > For questions, please contact Joel Creswell, PhD, cced on this email and available at Joel.Creswell@mail.house.gov.
> >
> > Best regards,
> > Adam Weiss
> > ---
> > Legislative Aide
> > Office of Congressman Daniel Lipinski (IL-03)
> > 2346 Rayburn House Office Building

Washington, DC 20515
(202) 225-5701

Message

From: Cory, Preston (Katherine) [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BFD80B15F6D04A3BA11FC8CA3C85BC50-CORY, KATHE]
Sent: 9/24/2018 1:30:34 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]; Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Subject: RE: fyi - DuPage County (Illinois) Board Chairman meeting request / Sterigenics facility -Willowbrook, IL

Great, thank you!

From: Woods, Clint
Sent: Monday, September 24, 2018 9:29 AM
To: Cory, Preston (Katherine) <Cory.Preston@epa.gov>
Cc: Lewis, Josh <Lewis.Josh@epa.gov>; Rakosnik, Delaney <rakosnik.delaney@epa.gov>
Subject: RE: fyi - DuPage County (Illinois) Board Chairman meeting request / Sterigenics facility -Willowbrook, IL

Not on travel – Just running across town later in the day. We can make it work – Copying Josh and Delaney, who can help on timing.

From: Cory, Preston (Katherine)
Sent: Monday, September 24, 2018 9:26 AM
To: Woods, Clint <woods.clint@epa.gov>
Subject: RE: fyi - DuPage County (Illinois) Board Chairman meeting request / Sterigenics facility -Willowbrook, IL

Are you not both on travel this Wednesday?

From: Woods, Clint
Sent: Monday, September 24, 2018 9:26 AM
To: Cory, Preston (Katherine) <Cory.Preston@epa.gov>
Subject: RE: fyi - DuPage County (Illinois) Board Chairman meeting request / Sterigenics facility -Willowbrook, IL

Bill, me, and we'll loop in our people in NC

From: Cory, Preston (Katherine)
Sent: Monday, September 24, 2018 9:24 AM
To: Woods, Clint <woods.clint@epa.gov>
Subject: RE: fyi - DuPage County (Illinois) Board Chairman meeting request / Sterigenics facility -Willowbrook, IL

Clint,

With whom in OAR should they meet?

From: Woods, Clint
Sent: Friday, September 21, 2018 2:10 PM

To: Cory, Preston (Katherine) <Cory.Preston@epa.gov>
Subject: Fwd: fyi - DuPage County (Illinois) Board Chairman meeting request / Sterigenics facility -Willowbrook, IL

Preston,

Deliberative Process / Ex. 5 Thanks!

Clint

Begin forwarded message:

> **From:** "Koerber, Mike" <Koerber.Mike@epa.gov>
> **Date:** September 21, 2018 at 2:08:32 PM EDT
> **To:** "Woods, Clint" <woods.clint@epa.gov>
> **Subject: FW: fyi - DuPage County (Illinois) Board Chairman meeting request / Sterigenics facility - Willowbrook, IL**
>
> FYI
>
> **From:** Kelley, Jeff
> **Sent:** Friday, September 21, 2018 1:03 PM
> **To:** Rowan, Anne <rowan.anne@epa.gov>
> **Cc:** Grantham, Nancy <Grantham.Nancy@epa.gov>; Hull, George <Hull.George@epa.gov>; Deamer, Eileen <deamer.eileen@epa.gov>
> **Subject:** Re: fyi - DuPage County (Illinois) Board Chairman meeting request / Sterigenics facility - Willowbrook, IL
>
> Although letter is addressed to OECA, this is really an OAR issue ... Clint Woods and Mike Koerber (and maybe Bill Wehrum) coming out to Chicago next week to meet with elected officials.
>
> ---
> ***Jeff Kelley***
> *Director, Office of External Communications*
> *U.S. EPA Region 5*
> *ph: 312-353-1159*
>
> On Sep 21, 2018, at 11:58 AM, Rowan, Anne <rowan.anne@epa.gov> wrote:
>
> Nancy, George - I haven't seen the incoming letter either but the email from Loren Monroe to K. Preston Corey (scroll down) says the Chairman of the DuPage County Board wants to meet with Ms. Bodine in Hqs. next week. Illinois EPA is also very much involved in the Sterigenics matter but this request is for U.S. EPA. Andrew Hanson asked for a 1-pager from Region 5 and we're trying to either find the most recent one or get a new one drafted.
>
> **From:** Hanson, Andrew
> **Sent:** Thursday, September 20, 2018 5:45 PM
> **To:** Beckmann, Ronna Erin <beckmann.ronna@epa.gov>; Rowan, Anne <rowan.anne@epa.gov>
> **Cc:** Cory, Preston (Katherine) <Cory.Preston@epa.gov>; Hannon, Arnita <Hannon.Arnita@epa.gov>
> **Subject:** FW: Meeting request
>
> Hi Ronna and Anne –

Please see the note at bottom from the DC-based lobbyist representing DuPage County, IL. County Board member (and former State Senator) Dan Cronin will be in town next week and has asked for a meeting with (presumably) Susan Bodine. Preston is reaching out to OECA since they were the recipients of the incoming letter, but I wanted you to be aware of this since R5 likely will be asked to join this discussion once it's scheduled. I haven't seen the letter, and the note below doesn't specify whether they're referring to Illinois EPA or U.S. EPA, but I'm sure you guys would know.

Thanks and talk soon.

AH

From: Cory, Preston (Katherine)
Sent: Thursday, September 20, 2018 4:47 PM
To: Monroe, Loren <Loren_Monroe@BGRdc.com>
Cc: Hanson, Andrew <Hanson.Andrew@epa.gov>
Subject: RE: Meeting request

Hi Loren,

I'm happy to help set this up for next week. Let me touch base with my counterparts in Office of Compliance, and I should have an update tomorrow.

Thanks,
Preston

K. Preston Cory
Director of Intergovernmental Relations
Office of the Administrator
U.S. Environmental Protection Agency
202-579-4281

From: Monroe, Loren [mailto:Loren_Monroe@BGRdc.com]
Sent: Thursday, September 20, 2018 1:49 PM
To: Cory, Preston (Katherine) <Cory.Preston@epa.gov>
Subject: Meeting request

Cory:

On behalf of Dan Cronin, Chairman of the DuPage County (Illinois) Board, I would like to request a meeting with Assistant Administrator Bodie Of the Office of Enforcement and Compliance, or one of her representatives, to discuss an issue that the EPA has raised in the County. The Chairman would like to request the meeting on Wednesday, September 26th, as he will be in Washington DC on that date.

Recently the EPA issued a statement which indicated the levels of ethylene oxide surrounding the Sterigenics facility in Willowbrook, IL are harmful to those with long term exposure. Approximately 20,000 county residents are potentially impacted. Chairman Cronin would like to meet to better understand the steps being taken by the US EPA to addresses concerns about ethylene oxide levels in the community.

Attached is a request letter, addressed to the Assistant Administrator of Enforcement, the EPA announcement and a County Resolution on the matter.

Please let me know if there are additional individuals who I should reach out to submit this request.

Thank you in advance for your time and assistance.

Loren Monroe
Principal
BGR Government Affairs, LLC
The Homer Building
Eleventh Floor South
601 Thirteenth Street, NW
Washington, DC 20005
Direct: (202) 661.6311
Loren_Monroe@bgrdc.com
www.bgrdc.com

http://www.msn.com/en-us/news/politics/trump-rauner-have-the-power-to-shut-down-a-toxic-willowbrook-plant-will-they-use-it/ar-AAAr2ec?ocid=iehp

Trump, Rauner have the power to shut down a toxic Willowbrook plant. Will they use it?

http://www.chicagotribune.com/news/local/breaking/ct-met-sterigenics-bruce-rauner-lisa-madigan-20180920-story.html

Nancy Grantham
Office of Public Affairs
US Environmental Protection Agency
202-564-6879 (desk)
202-253-7056 (mobile)

From: Grantham, Nancy
Sent: Friday, September 21, 2018 1:15 PM
To: Richardson, RobinH <Richardson.RobinH@epa.gov>; Bowles, Jack <Bowles.Jack@epa.gov>; Haman, Patricia <Haman.Patricia@epa.gov>; Thundiyil, Karen <Thundiyil.Karen@epa.gov>; Davis, Matthew <Davis.Matthew@epa.gov>
Cc: Grantham, Nancy <Grantham.Nancy@epa.gov>
Subject: FW: fyi - DuPage County (Illinois) Board Chairman meeting request / Sterigenics facility - Willowbrook, IL

fyi

Nancy Grantham
Office of Public Affairs
US Environmental Protection Agency
202-564-6879 (desk)
202-253-7056 (mobile)

Message

From: Koerber, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9C513901D4FD49F9AB101A6F7A7A863E-KOERBER, MIKE]
Sent: 9/22/2018 5:07:15 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Rimer, Kelly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=123a21a46d0e4e53a590798cdcc3fb47-KRIMER]; Bremer, Kristen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b7ad6f4a11064ef08cb03aec9dc8e892-KBREMER]; Ashley, Jackie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=01a9a3cadfa14c509d09cdae3498dd43-JASHLEY]; Terry, Sara [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a5f08a9bf1324b05bc02a7dd2ea695e4-STERRY]; Davis, Alison [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1c309f42d5d44d18a52b027bd0112778-ADAVIS06]; Smith, Darcie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ae3c2377efb42879b943db8796ddc05-Smith, Darcie]; Cortelyou-Lee, Jan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=75b1eec7b16e46d5b9114935fc6a771e-JCORTELY]; Sasser, Erika [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=477638fe84004800bfdf8e62fe3cafc8-ESASSER]; Shappley, Ned [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5fc7fde372054ab5ac38f24b9072b73d-Shappley, N]
CC: Tsirigotis, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d19c179f3ccb4fadb48e3ae85563f132-PTSIRIGO]
Subject: Fwd: Letter re: Willowbrook Ambient Air Testing
Attachments: 18.09.21 - Letter re Willowbrook ambient air testing request - EPA Wheel....pdf; ATT00001.htm

FYI

Sent from my iPhone

Begin forwarded message:

From: "Nam, Ed" <nam.ed@epa.gov>
Date: September 21, 2018 at 6:35:47 PM EDT
To: "Koerber, Mike" <Koerber.Mike@epa.gov>
Subject: FW: Letter re: Willowbrook Ambient Air Testing

FYI. This will presumably be controlled.
-Ed

From: Deamer, Eileen
Sent: Friday, September 21, 2018 2:21 PM
To: Stepp, Cathy <stepp.cathy@epa.gov>; Thiede, Kurt <thiede.kurt@epa.gov>; Payne, James <payne.james@epa.gov>; Nam, Ed <nam.ed@epa.gov>
Cc: Kelley, Jeff <kelley.jeff@epa.gov>; Fortin, Denise <Fortin.Denise@epa.gov>; Rowan, Anne <rowan.anne@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Cain, Alexis <cain.alexis@epa.gov>; Davis, Matthew <Davis.Matthew@epa.gov>
Subject: FW: Letter re: Willowbrook Ambient Air Testing

New incoming letter attached requesting ambient air monitoring sent to both Administrator Wheeler and RA Stepp. Matt will share with HQ folks.

Eileen Deamer
U.S. EPA Region 5
Congressional and Intergovernmental
(312) 886-1728

From: Applegate, David (Duckworth) [mailto:David_Applegate@duckworth.senate.gov]
Sent: Friday, September 21, 2018 2:10 PM
To: Deamer, Eileen <deamer.eileen@epa.gov>; Davis, Matthew <Davis.Matthew@epa.gov>
Cc: Denk, Hilary <Hilary.Denk@mail.house.gov>; Hunt, Jasmine (Durbin) <Jasmine_Hunt@durbin.senate.gov>; Duque, Clarisol (Durbin) <Clarisol_Duque@durbin.senate.gov>; Adhar, Radha (Duckworth) <Radha_Adhar@duckworth.senate.gov>; Timmins, Gary <Gary.Timmins@mail.house.gov>; Nguyen, Tran (Durbin) <Tran_Nguyen@durbin.senate.gov>
Subject: Letter re: Willowbrook Ambient Air Testing

Good afternoon Eileen and Matt,

Many thanks again for scheduling a conversation with our offices and EPA Region 5. I wanted to share a letter on behalf of Senator Duckworth, Durbin and Congressman Foster. We would appreciate if you could share this letter with Administrator Stepp and Acting Administrator Wheeler. Thank you and we look forward to speaking with you again soon. Have a nice weekend.

Best,

David T. Applegate
Special Projects Manager
Office of U.S. Senator Tammy Duckworth

Message

From: Tom Roberts [tcr@vnf.com]
Sent: 9/10/2018 7:36:10 PM
To: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]
Subject: EO - Sterigenics / Willowbrook
Attachments: sterigenics - transcript of ATSDR statements.docx

Clint – as a follow up to our call on Friday, attached please find a transcript of the some of the statements made by ATSDR personnel at the Willowbrook town hall meeting on August 29. As noted, ATSDR declared that the report it prepared on Sterigenics' facility at Region 5's request was not intended to be made available to the public. Region 5, by posting this on their website and sharing it with the Mayor, is responsible for creating the mess in which we currently find ourselves.

If you have a few minutes, I would like to connect with you to get a report on your discussions with Region 5 last week and to explore whether there is anything the EPA HQ can issue publicly that tracks what the ATSDR folks stated at the town hall and puts the ATSDR report in the proper context.

Thanks, Clint.

Tom Roberts | Partner
Van Ness Feldman LLP

1050 Thomas Jefferson Street, NW
Washington, DC 20007
(202) 298-1930 (o) | (202) 365-7750 (c) | tcr@vnf.com | vnf.com

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Willowbrook Town Hall Meeting (August 29, 2018)
ATSDR Statements Regarding Report on Sterigenics' EO Facility

Mark Johnson (ATSDR – Regional Director)
"Our conclusions in our document then, we call this a public health hazard. And our intention of labeling it that way was to incur, to inform, and to support the actions taken to reduce the emissions from Sterigenics and to reduce the exposure and the risk to the community. Unfortunately the way the communication strategy fell through did not allow us to really put this into context. And I think the result of that is a bit more of a reaction to our report which is a very technical document and was intended to be sent to the EPA to support their decisions. We did not intend to directly to be a reflection or to the tool for communication to the residents. So we're hoping to clarify some of those inclusions tonight."

Mark Johnson
"We would not consider, we know the risk was something we thought was actionable. It was not one that indicated immediate health threat or that there was an emergency situation. However it was a needed action to take to reduce risk to the community for long-term, lifetime exposure."

Mark Johnson
"We cannot find that the levels that were detected in the community are sufficient that would cause these effects in the residents. However, the basis for our recommendations for a reduction in exposure had to do with the long-term concerns."

Audience
"So will they be evaluating then the effects of outdoor activity in the local area for short term, for students? These children start at pre-K and they go through... we've had students that have been here, gone through the entire school system within the last 30 years. What are we going to tell the parents that are going to be at my next board meeting?"

Mark Johnson
"We have no reason to believe that it's unsafe for kids to be outside."

Mayor
"Mark Johnson told me on Saturday that I was not at risk opening my window across the street from the factory. He told me that we were not at risk running the air conditioning. These are simple questions that I told them my residents need answers for. Simple questions. "

"At our worst case scenario canister, there was 39 canisters around the area. They took the worse case scenario, multiplied it by 30 years, 250 days a year, 24 hours exposure, and someone... and the wind had to be identical for the entire 30 years – under those circumstances 6.4 people out of 1,000 **might** be affected by this."

Michelle Colledge (Author of ASTDR Report)
"They were watching the weather. They were watching to see when the conditions would be the worst in the closest residents to the facilities property line. So they went out and at a time where they had 2 consecutive days that the forecast was such that they expected the worst conditions for the highest concentrations. And that is how they chose when they came out. They didn't choose it based on ... it was as random as it ever would have been for how many if the sterilizers were operating and Kathy said that usually they're pretty close to capacity."

"So that's how they chose when they were going to sample. And it's exactly what the mayor was saying about, the reason why there's... you see the model has a lower concentration than the highest measurement and it's because they definitely biased it on purpose to try to capture what might be the worst exposure in the community when they're downwind from the facility. So there's some bias. It's biased to the highest concentration that we would expect to see with a downwind exposure and then, on top of that, we made an assumption that is unrealistic as far as... there are probably some people that have stayed at home and are they're mostly home. I don't know if anyone's home 24 hours a day, 7 days a week for an entire year for 33 years. Which is what we assumed. "

Mark Johnson
"We did not follow the communications plan we originally had developed that would have rolled this out in a more organized way. And which would brief local officials about this in a way that could be communicated to the public. So we apologize for that. We didn't follow what we should have been doing, but we're here not to explain information. And obviously we don't have all the answers."

Audience
"This is utterly bazaar. We just sat here for four hours trying to figure out what's going on and what is abundantly clear is that nobody understands. This has been released. Without proper protocol. Without appropriate understanding. We're not sure the mode you were testing. We've got sick people in the community. We've been here for 4 hours and you just made the statement you made. I am absolutely stumped. I'm not sure why we're hear and our community's in the press. Can somebody give us an understanding of what is going on here and a commitment to ??? as to when you can do that. Please?"

Message

From: Woods, Clint [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC65010F5C2E48F4BC2AA050DB50D198-WOODS, CLIN]
Sent: 3/12/2019 4:20:42 PM
To: Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]
Subject: FW: Do you need anything else on this?
Attachments: 19.02.15 - Letter to EPA Air Radiation Division re EtO Air Monitoring in Lake Co.pdf; ATT00001.htm; 18.10.17 0 19-000-0435.pdf; ATT00002.htm; 19.01.29- Duckworth et al to EPA opposing RTR on HCL that undermines ETO risk assessment.pdf; ATT00003.htm; 19.02.13 - IL delegation to Wheeler on Sterigenics national background study.pdf; ATT00004.htm; Meeting with Senator Durbin.updated 3.11.19.v2.docx; ATT00005.htm

Would you midn printing out 3 copies of the attached for the 2:30?

From: Woods, Clint
Sent: Tuesday, March 12, 2019 9:24 AM
To: Lewis, Josh <Lewis.Josh@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>
Subject: Fwd: Do you need anything else on this?

Begin forwarded message:

> **From:** "Davis, Alison" <Davis.Alison@epa.gov>
> **To:** "Woods, Clint" <woods.clint@epa.gov>
> **Subject: Do you need anything else on this?**

Deliberative Process / Ex. 5

> **From:** Davis, Alison
> **Sent:** Monday, March 11, 2019 11:49 AM
> **To:** Woods, Clint <woods.Clint@epa.gov>
> **Subject:** RESENDING FW: Meeting with Senator Durbin.updated 3.11.19.v2.docx
>
> Removing "Updating" from the header. Please use this version. Thanks.
>
> ---
>
> **From:** Davis, Alison
> **Sent:** Monday, March 11, 2019 11:46 AM
> **To:** Woods, Clint <woods.Clint@epa.gov>
> **Subject:** Meeting with Senator Durbin.updated 3.11.19.v2.docx
>
> Hi Clint,
> Here you go. R5 provided info on Lake County.
> This also references several letters from the Senator on EtO, and says they are attached. They are included here.
> -Alison