VILLAGE OF WILLOWBROOK
EST. 1960

Willowbrook

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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.**

<u>Stack Testing at the Sterigenics Facilities</u>

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