UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

December 9, 2019

Mr. Phil Macnabb
President, Sterigenics
Sotera Health
9100 South Hills Boulevard, Suite 300
Broadview Heights, OH 44147

Dear Mr. Macnabb:

Pursuant to section 114 of the Clean Air Act (CAA), the U.S. Environmental Protection Agency (EPA) is collecting information related to hazardous air pollutant emissions at ethylene oxide (EtO) commercial sterilization facilities to inform its review of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for this sector. As part of this effort, the EPA requires your assistance in providing information related to these emissions. If Sotera Health has previously provided information, the EPA appreciates your cooperation. However, in order to support an effective rulemaking, more information will be required.

We are requesting information regarding EtO commercial sterilization operations at the facilities specifically listed below and wholly owned by Sotera Health, as well as any EtO commercial sterilization facilities wholly owned by Sotera Health that are not included on this list:

Facility	Street Address	City	State
Sterigenics	84 Park Road	Queensbury	NY
Sterigenics	2971 Olympic Industrial Court Southeast	Atlanta	GA
Sterigenics	18021 Withers Cove Park Drive	Charlotte	NC
Sterigenics	2400 Airport Road	Santa Teresa	NM
Sterigenics	1302 Avenue T	Grand Prarie	TX
Sterigenics	5725 Harold Gatty Drive	Salt Lake City	UT
Sterigenics	4801-63 50th Street	Los Angeles	CA
Sterigenics	4900 Gifford Avenue	Los Angeles	CA
Sterigenics	687 South Wanamaker Avenue	Ontario	CA

The request is a survey in Microsoft® Excel format. We request that you complete and return the survey by February 6, 2020. Please download the spreadsheet and Instructions Document at: https://www.epa.gov/stationary-sources-air-pollution/ethylene-oxide-emissions-

standards-sterilization-facilities. If there is a facility on this list not wholly owned by Sotera Health, please indicate that in the response letter. A completed survey is not required for that facility.

This section 114 request is designed to collect information on emissions from EtO sterilization operations, including sterilization chamber vents, aeration room vents, chamber exhaust vents, and fugitive emissions[1] at the facilities. The Instructions Document contains a summary of the instructions for completing and submitting responses to this survey request.

The survey request is designed to collect emissions information, which by law cannot be confidential business information (CBI). Submit the requested information to the EPA according to the instructions provided in Section 4 of the Instructions Document. **You are required to return all requested information to the EPA on or before the schedule due date specified in this letter.**

Supplemental information is contained in the following enclosures:

Description	**Enclosure #**
EPA's Information Gathering Authority Under Section 114 of the Clean Air Act	Enclosure 1
Disclosure of Emissions Data Claimed as Confidential Under Sections 110 and 114(c) of the Clean Air Act	Enclosure 2
Summary of Procedures for Safeguarding Clean Air Act Confidential Business Information	Enclosure 3
Designation of RTI International as Authorized Representative	Enclosure 4

This request is one step in an established public process for collecting foundational information as part of NESHAP reviews. The public and stakeholders will continue to have an opportunity to comment on the EtO commercial sterilization NESHAP review in the future, including a formal notice-and-comment period on any proposed action.

If you have questions regarding this survey, please contact Jonathan Witt in the EPA's Fuels and Incineration Group at 919-541-5645 or witt.jon@epa.gov.

Thank you for your assistance in this effort. The data will provide comprehensive information about the EtO commercial sterilization source category, which will lead to more effective rulemaking.

Sincerely,

Penny Lassiter
Division Director
Sector Policies and Programs Division

[1] Defined as emissions of EtO which are not routed through the existing control equipment

4 Enclosures

cc: Peter D. Lopez, Regional Administrator, U.S. EPA Region 2
Gregory Sopkin, Regional Administrator, U.S. EPA Region 8
John Filippelli, U.S. EPA Region 2
Ken Mitchell, U.S. EPA Region 4
David Garcia, U.S. EPA Region 6
Jeffrey Robinson, U.S. EPA Region 6
Carl Daly, U.S. EPA Region 8
Elizabeth Adams, U.S. EPA Region 9
Steven Flint, New York State Department of Environmental Conservation
Karen Hays, Georgia Environmental Protection Division
Michael Abraczinskas, North Carolina Department of Environmental Quality
Elizabeth Bisbey-Kuehn, New Mexico Environmental Department
Tonya Baer, Texas Commission on Environmental Quality
Bryce Bird, Utah Division of Air Quality
Kurt Karperos, California Air Resources Board
Edie Chang, California Air Resources Board
Wayne Nastri, South Coast Air Quality Management District
Phil Fine, South Coast Air Quality Management District