Message

From: Parker, Cindy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B2A4068E15E442B5BC310BA08ACFB492-PARKER, CINDY]
Sent: 2/19/2019 7:34:52 PM
To: Ahuja, Anupa [ahuja.anupa@epa.gov]
Subject: FW: NRDC: Action needed to protect Americans from toxic EtO pollution

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From: Verhalen, Frances
Sent: Tuesday, February 19, 2019 11:13 AM
To: Parker, Cindy <parker.cindy@epa.gov>; Madden, Joshua <madden.joshua@epa.gov>; Casso, Ruben <Casso.Ruben@epa.gov>
Subject: FW: NRDC: Action needed to protect Americans from toxic EtO pollution

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From: Price, Lisa
Sent: Tuesday, February 19, 2019 10:06 AM
To: Donaldson, Guy <Donaldson.Guy@epa.gov>; Verhalen, Frances <verhalen.frances@epa.gov>
Subject: FW: NRDC: Action needed to protect Americans from toxic EtO pollution

FYI

Lisa Marie Price
Deputy Director
Multimedia Division
US EPA Region 6
214 665 6744

From: Bokun, Lisa
Sent: Friday, February 15, 2019 12:48 PM
To: Stenger, Wren <stenger.wren@epa.gov>; Price, Lisa <Price.Lisa@epa.gov>
Cc: Taheri, Diane <Taheri.Diane@epa.gov>
Subject: FW: NRDC: Action needed to protect Americans from toxic EtO pollution

Sharing.....

From: Carey, Curtis
Sent: Friday, February 15, 2019 12:02 PM
To: Regional Public Affairs Directors <Regional_Public_Affairs_Directors@epa.gov>
Subject: NRDC: Action needed to protect Americans from toxic EtO pollution

Action Needed to Protect Americans from Toxic EtO Pollution

February 14, 2019 Dan West

Ethylene oxide (EtO) is a common, highly hazardous industrial chemical linked to breast cancer and immune system cancers like non-Hodgkin lymphoma and lymphocytic leukemia (see EPA IRIS Exec Summary, Dec 2016). Concerned community members in Illinois made it a 2018 campaign issue after two federal agencies released studies showing elevated cancer risks outside Chicago. Thanks to the effort and organizing of their constituents, members of Congress are now taking action to combat the threat this colorless and highly explosive toxic gas poses to neighborhoods across the country.

EtO is made from ethylene, a petrochemical, and is used primarily to make ethylene glycol, a highly toxic chemical used in antifreeze and as a coolant for cars, gas compressors, and air conditioning systems. It is also commonly used as a sterilizer for medical equipment, and industrial sterilizing facilities around the country vent it, poisoning the air of nearby communities. The U.S. Environmental Protection Agency (EPA) considers EtO emissions from sterilization facilities to be among the most hazardous air pollutants posing the greatest health risks in the largest number of urban areas.

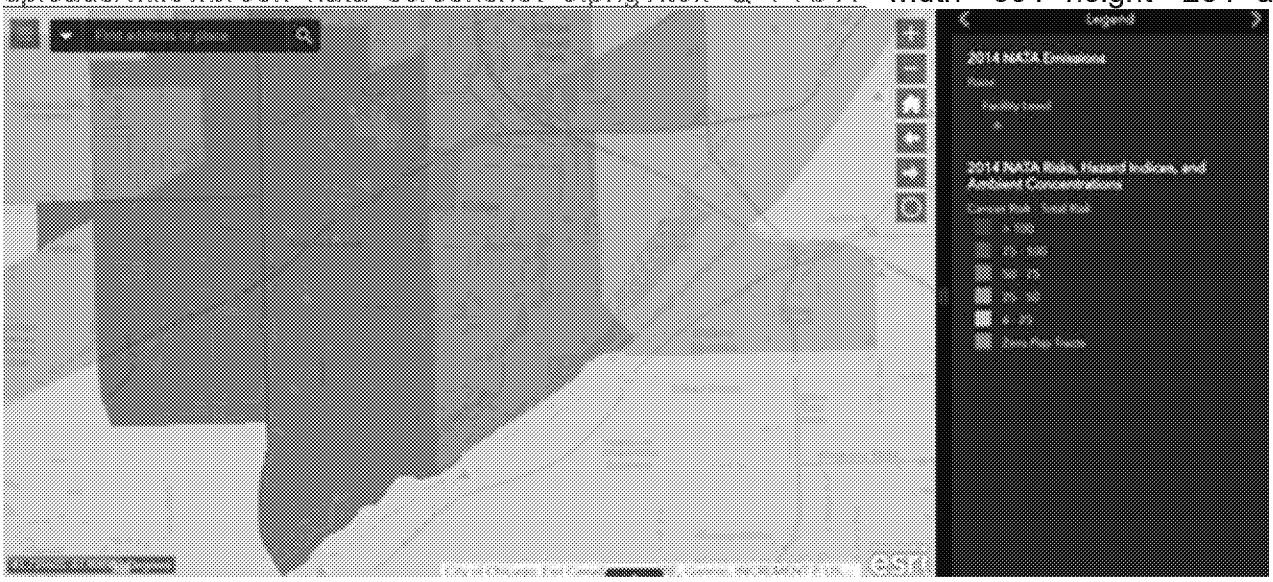
State and federal agencies monitor EtO air emissions, but monitoring is far behind where it should be. Local, publicly-available data is either outdated or nonexistent. The EPA released its most recent National Air Toxics Assessment (NATA) in 2018, but the data is from 2014. The NATA is used as a screening tool to identify places of interest for more detailed study, so comprehensive local monitoring is still needed to pinpoint risk at specific places, like homes or schools, or to compare risks and exposures at local levels, like between neighborhoods, but the NATA is supposed to be the starting point.

Since 2014, EPA updated its Integrated Risk Information System (IRIS), estimating cancer risks from EtO exposure are 30 times worse than previously thought. This was based on a 2016 assessment of all available scientific studies including laboratory animal studies, cellular mechanistic studies, and workplace epidemiologic studies (see Jinot et al 2018). EPA's updated risk assessment confirms that EtO is carcinogenic to humans by inhalation (stronger than its previous classification of 'probably carcinogenic to humans').

In August 2018, the Agency for Toxic Substances and Disease Registry (ATSDR) within the U.S. Department for Health and Human Services (HHS) issued its final Health Consultation report on health risks posed by EtO air emissions from the Sterigenics facility in Willowbrook, a Chicago suburb. But the problem isn't limited to this one facility.

<img typeof="foaf:Image"
src="https://assets.nrdc.org/sites/default/files/styles/full_content/public/media-

uploads/willowbrook_nata_screenshot_0.png?itok=Q-4-7bV7" width="634" height="284" alt="" />



Screenshot of EPA NATA map around Willowbrook, Illinois, released in 2018 with data from 2014. https://gispub.epa.gov/NATA/

Alarmingly, the 2014 NATA already shows 58 EPA monitoring tracts in 18 different counties across 12 states that have EtO air emissions at levels that pose cancer risks higher than 1 in 10 thousand people (see ATSDR 2018 Health Consultation report). This is far higher than the 1 in 1 million that EPA considers an acceptable risk, which triggers federal regulators to notify polluters.

Over 288,000 people live in the monitoring tracts across the country that EPA identified to be at elevated risk of EtO exposure, and nine counties have facilities that are emitting more EtO than the Sterigenics Willowbrook facility. This is not a singular issue affecting one suburb of Chicago, it's a national issue that begs EPA action in how it monitors and regulates air toxics in general.

U.S. Counties with High EtO Cancer Risk

(>1:10,000 people, Source: EPA NATA)

County	State	Facility	Total EtO Emissions (Tons/Year)
St. Charles	Louisiana	Union Carbide	15.03
Jefferson	Texas	Port Neches Plant	10.77
Webb	Texas	Midwest Sterilization Corp	7.86
Harrison	Texas	Texas Operations	7.4
Cape Girardeau	Missouri	Midwest Sterilization Corp	3.49

Lehigh	Pennsylvania	B Braun	3.3
Newton	Georgia	C R Bard	3.02
Kanawha	West Virginia	Union Carbide	2.9
Doña Ana	New Mexico	Sterigenics	2.88
DuPage	Illinois	Sterigenics	2.78
Iberville	Louisiana	BCP Ingredients	2.5
St. John the Baptist	Louisiana	Air Products Performance Manufacturing	1.61
Lake	Illinois	Medline Industries	1.53
New Castle	Delaware	CRODA Inc.	1.35
Jefferson	Colorado	TERUMO	1.11
Harris	Texas	Channelview Plant	0.95
Anasco	Puerto Rico	Edwards Lifesciences Corp	0.69
Warren	New Jersey	BASF	0.5

Successful efforts by community members and journalists in Illinois brought much needed public attention to EtO last year. Since then, Illinois Senators Durbin and Duckworth and Representatives Foster, Lipinski and Schneider introduced the Expanding Transparency Of Information and Safeguarding Toxics (ETO IS Toxic) Act, which directs EPA and ATSDR to modernize their pollution monitoring and chemical assessment programs. They've sent numerous letters already and plan to send more in the coming months.

EPA should update the National Air Toxics Assessment more frequently, coordinate more quickly and transparently with other agencies, and update and enforce stricter regulations on venting. Not only will it save lives if EPA takes these actions, it will help rebuild trust within local communities that the federal government really is trying to protect public health.

Unfortunately, EPA seems to be moving in the opposite direction. On February 4, EPA snuck a review of the health risk factor for EtO into its proposed amendments to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Hydrochloric Acid (HCl) Production source category, even though it acknowledges EtO is not part of the HCl source category under review. This happened a day before EPA released updated data from Willowbrook confirming high levels of EtO in surrounding neighborhoods, and a day after allegations surfaced that Sterigenics was covering up its emissions and operating secret plants.

On February 11, NRDC joined 17 other environmental organizations on a letter to EPA stating the inappropriateness of opening the EtO health risk factor in this source-focused proposal. But since EPA has done so, it should hold at least one public hearing on this proposal as it relates to EtO to give the public a chance to comment. The letter also emphasizes that though most of the national attention generated by this issue is in the Chicago area, EtO is an issue affecting communities around the nation.

Local Illinoisans and the members of Congress who represent them are raising awareness about this issue. Members of the Illinois congressional delegation—Sens. Durbin and Duckworth and Reps. Schneider, Lipinski, Foster, and Casten— most recently re-introduced the ETO IS Toxic Act. The people of Illinois – and all around the country – must be protected from this dangerous toxin. Given EPA's foot-dragging on this issue, members of Congress should join this effort to force the agency to do its job and protect our health and that of our children.