RA BRIEF

Date Prepared: April 25, 2019 **Priority Level:** 3 **EPA Goal Supported:** Improve Air Quality

Issue: High cancer risk estimates for Ethylene Oxide (EtO) in Region 3—Status of Review

Location: RA's Meeting Room

Context:

1. EPA updated its EtO cancer risk estimate in 2016. (maybe add magnitude change or at least direction?) May add what EtO is used for?
2. National Air Toxics Assessment (NATA)(date is was released) used this new estimate for its upcoming assessment and found it (what is it? Risk?) to be 30-60 times higher than previous values.
3. Nationally, there are 11 EtO facilities identified in the 2014 NATA with estimates of risks (for people living close to these facilities) greater than 1000 in a million.
4. Region 3 has 2 of those facilities:
    - B. Braun Med Inc., Allentown, PA
    - Union Carbide, So. Charleston, WV
5. Region 3 in total has about 27 known EtO facilities that was reported in NATA.
6. Region 5 conducted air sampling of Sterigenics (a commercial sterilizer) in Willowbrook, IL. The results show high concentrations of EtO (greater than 1000 in a million cancer risk). (I don't think this is true? Based on new runs by OAQPS?) These results have garnered national concern and attention to EtO facilities (commercial sterilizers, hospitals, chemical plants). (when the IL DEP shut the place down? I think this is important for context) The Illinois Department of Health issued a cancer incidence assessment which showed higher than expected cancers related to EtO (lymphoma, breast cancer).
7. Office of Air and Radiation directed regional offices to share information and develop consistent messaging and communication with State/Local (S/L) agencies, communities and facilities.

~~7.~~8. Region 3 inspected the B. Braun Facility in October 2019 and did not identify any areas of concern with their CAA compliance at the time of the inspection.

Critical Messages:

1. Region 3's highest risk sources have been from coke oven emissions; the newly revised EtO risk estimates have surpassed many of the coke oven risks. We have 2 facilities with risks greater than Sterigenics (Braun, Allentown, PA and Union Carbide, Institute, WV)
2. The vast majority of R3 communities identified in NATA for EtO can be considered potential areas for Environmental Justice concerns based on preliminary analysis using the economic and demographic indices in EJ Screen.
3. Communities and environmental groups may be asking about health impacts,

regulations, and permitting questions.

4. R3 has developed a plan to evaluate our EtO facilities:
   - First tier (5 facilities): focus on 100-1000 in a million risk
     - Confirm latest emissions, obtain modeling parameters, work with S/Ls
     - Remodel risk using latest emissions, determine latest cancer risk
     - Develop communication plan, focus on risk communication
     - Engage in discussions with facilities
     - Engage S/Ls and local communities
   - Second tier (remainder of list): We go down the list of the remaining facilities to confirm latest data to determine if additional remodeling is needed. If the risk remains low, a communication plan will be developed to reach out to the communities and facilities. Again, we would be working with our S/Ls.
   - R3 Air Enforcement and OECA are working on a pilot project to identify facilities using EtO who may not show up in known databases.

Commented [KH1]: Do we want to include this? To show that the universe is possibly much larger?

Considerations:

1. Note that NATA is conducted on a national scale and it is meant to be used as a screening tool; high risk sources, such as EtO, are now being further assessed at a local level with local conditions.
2. This version of NATA uses 2014 emissions data, which does have a lag time as the 2017 emissions data are not due to EPA until early 2019. As such, we consulted with State and Local (S/L) agencies regarding more recent emission estimates and current conditions of the facilities.
3. We have been part of a national EtO workgroup to share experiences concerning air monitoring, community outreach and S/L collaboration. We also work closely with air enforcement as we moved forward in finding additional EtO sources.
4. We are notifying S/L air agencies of our activities and plan to share state-specific information packages when completed in order to conduct outreach.

History & Demographics:

1. EtO is a listed hazardous air pollutant in the 1990 Clean Air Act Amendments. Based on EPA's 2016 update of its inhalation cancer risk estimate, EtO is categorized as carcinogenic to humans, sufficient exposure can cause lymphoid cancer and breast cancer in females. Children under 16 have greater susceptibility to EtO's inhalation cancer risk.
2. There is a Maximum Achievable Control Technology (MACT) (date?) regulation for EtO sterilization and fumigation facilities such as medical equipment suppliers, pharmaceuticals, other health related industries, spice manufacturers, large libraries, large museums and archives, and contract sterilizers.
   - Office of Air Quality Planning and Standards is planning to issue an interim final EtO sterilizer MACT this summer. A final rule is planned for Dec. 2019. A separate EtO rule is being considered for hospitals. A Miscellaneous Organic

NESHAP (National Emission Standards for Hazardous Air Pollutants) is also being developed for some EtO operations.

First Tier Review (greater than 100 in a Million Risk—2014 NATA):

Facility	State	County	City
B BRAUN MED INC/ALLENTOWN	PA	Lehigh	ALLENTOWN
UNION CARBIDE CORPORATION-INSTITUTE	WV	Kanawha	INSTITUTE
Sterigenics	**IL**	**Dupage**	**Willowbrook**
UNION CARBIDE CORP -SO CHARLESTON FAC.	WV	Kanawha	SOUTH CHARLESTON
Covestro LLC - SOUTH CHARLESTON (Bayer Materialscience)	WV	Kanawha	SOUTH CHARLESTON
CRODA INC.	DE	New Castle	NEW CASTLE

Second Tier Review (less than 100 in a Million Risk—2014 NATA)

ST LUKES HOSP/MAIN BOILER PLT	PA	Lehigh	BETHLEHEM
Hercules Inc Aqualon Div	VA	Hopewell city	Hopewell
Evonik Goldshmidt Corp	VA	Hopewell city	Hopewell
UPMC MCKEESPORT/HOSPITAL	PA	Allegheny	MCKEESPORT
SUNOCO LOGISTICS MARCUS HOOK INDUSTRIAL COMPLEX	DE	New Castle	CLAYMONT
Rhodia Inc	PA	Delaware	Marcus Hook
OAKLAND VA MED CTR/PGH	PA	Allegheny	PITTSBURGH
SOUTH HILLS HEALTH SYS/JEFFERSON REG MED CTR	PA	Allegheny	PITTSBURGH
CAMC General Hospital	WV	Kanawha	CHARLESTON
Elite Spice	MD	Howard	Jessup
ICL-North America Inc - GALLIPOLIS FERRY PLANT	WV	Mason	GALLIPOLIS FERRY
VA MED CTR AND NHCU/PHILA	PA	Philadelphia	PHILADELPHIA
DuPont Teijin Films	VA	Chesterfield	Chester
CHRISTIANA CARE HEALTH SERVICES - CHRISTIANA HOSPITAL	DE	New Castle	NEWARK
LONZA INC/WILLIAMSPORT PLT	PA	Lycoming	WILLIAMSPORT
COVESTRO - New Martinsville	WV	Marshall	Proctor
Medical Mfg Corp	PA	Erie	Erie
CRODA INC/DRAKETOWN ROAD	PA	Clinton	MILL HALL
YORK WALLCOVERINGS INC/YORK	PA	York	YORK
Virginia Tech	VA	Montgomery	Blacksburg
CHILDRENS HOSP OF PGH/LAWRENCEVILLE*	PA	Allegheny	PITTSBURGH

*--Not reported in 2014 NATA but reported in 2017 National Emissions Inventory, need modeling.