Message

From: Bertram, Emily [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=463C65AD3E0C415BB1612500C957D6E8-LINN, EMILY]
Sent: 10/6/2020 5:52:11 PM
To: Supplee, Gwendolyn [Supplee.Gwendolyn@epa.gov]; Chow, Alice [chow.alice@epa.gov]
CC: Opila, MaryCate [Opila.MaryCate@epa.gov]
Subject: RE: [External] Question on Plan Approval for Oxidizer - B Braun Medical

Gwen, I am not seeing it in the Pa Bulletin on 12/21/19. I think we need to discuss.

Emily Bertram
Physical Scientist
Permits Branch
Air and Radiation Division
U.S. EPA Region 3
1650 Arch Street, 3AD10
Philadelphia, PA 19103
215-814-5273 | bertram.emily@epa.gov

From: Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>
Sent: Tuesday, October 06, 2020 1:51 PM
To: Chow, Alice <chow.alice@epa.gov>
Cc: Bertram, Emily <Bertram.Emily@epa.gov>; Opila, MaryCate <Opila.MaryCate@epa.gov>
Subject: FW: [External] Question on Plan Approval for Oxidizer - B Braun Medical

OK, PADEP doesn't have a copy of the notice, but the date that it was noticed according to PADEP is 12/21/19. I'm very nervous about this information because I am not seeing it in the PA Bulletin.

Gwendolyn K. Supplee
Life Scientist
U.S. Environmental Protection Agency, Region 3
Air and Radiation Division
Permits Branch (3AD10)
Supplee.Gwendolyn@epa.gov
215-814-2763

From: Wejkszner, Mark <mwejkszner@pa.gov>
Sent: Tuesday, October 06, 2020 1:49 PM
To: Patel, Shailesh <spatel@pa.gov>; Bertram, Emily <Bertram.Emily@epa.gov>; Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>; Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>
Cc: aschweitze <aschweitze@pa.gov>
Subject: RE: [External] Question on Plan Approval for Oxidizer - B Braun Medical

We don't have a copy of the notice but it was published on 12/21/19.

Mark J Wejkszner, P.E. | Program Manager
Department of Environmental Protection | Air Quality

Northeast Regional Office
2 Public Square | Wilkes-Barre PA 18701
Phone: 570.826.2528 | Fax: 570.826.2357
www.dep.state.pa.us

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From: Patel, Shailesh <spatel@pa.gov>
Sent: Tuesday, October 6, 2020 1:47 PM
To: Bertram, Emily <Bertram.Emily@epa.gov>; Wejkszner, Mark <mwejkszner@pa.gov>; Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>; Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>
Cc: Schweitzer, Andrew <aschweitze@pa.gov>
Subject: RE: [External] Question on Plan Approval for Oxidizer - B Braun Medical

B Braun is not a major facility, hence Draft PA wasn't sent to EPA for their review & comments.

Shailesh R Patel, P.E. | Air Quality Engineer
Department of Environmental Protection
2 Public Square
Wilkes-Barre, PA 18711
Phone: 570-826-2341| Fax: 570-826-2357
www.dep.pa.gov.

From: Bertram, Emily <Bertram.Emily@epa.gov>
Sent: Tuesday, October 6, 2020 1:17 PM
To: Wejkszner, Mark <mwejkszner@pa.gov>; Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>; Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>; Patel, Shailesh <spatel@pa.gov>
Cc: Schweitzer, Andrew <aschweitze@pa.gov>
Subject: RE: [External] Question on Plan Approval for Oxidizer - B Braun Medical

Also, could you forward the EPA notification email of that draft plan approval B action? I have no record of receiving the draft for EPA review and comment.

Thanks,
Emily

Emily Bertram
Physical Scientist
Permits Branch
Air and Radiation Division
U.S. EPA Region 3
1650 Arch Street, 3AD10
Philadelphia, PA 19103
215-814-5273 | bertram.emily@epa.gov

From: Wejkszner, Mark <mwejkszner@pa.gov>
Sent: Tuesday, October 06, 2020 1:16 PM
To: Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>; Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>; Patel, Shailesh <spatel@pa.gov>

Cc: aschweitze <aschweitze@pa.gov>; Bertram, Emily <Bertram.Emily@epa.gov>
Subject: RE: [External] Question on Plan Approval for Oxidizer - B Braun Medical

Our Engineer that reviewed the application would have that. Shai can you provide the PA Bulletin notice for B. Braun's new oxidizer?

Thanks,

Mark J Wejkszner, P.E. | Program Manager
Department of Environmental Protection | Air Quality
Northeast Regional Office
2 Public Square | Wilkes-Barre PA 18701
Phone: 570.826.2528 | Fax: 570.826.2357
www.dep.state.pa.us

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From: Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>
Sent: Tuesday, October 6, 2020 1:00 PM
To: Wejkszner, Mark <mwejkszner@pa.gov>; Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>
Cc: Schweitzer, Andrew <aschweitze@pa.gov>; Bertram, Emily <Bertram.Emily@epa.gov>
Subject: RE: [External] Question on Plan Approval for Oxidizer - B Braun Medical

Mark –

By chance do you have a copy of the public notice that states that the public could request a public meeting/hearing if they wanted one? I believe this would be the public notice that Braun would have been required to publish as part of it's Plan Approval application. If the actual notice isn't available, do you have a date when the public notice of the application was published? I appreciate all of your assistance in responding to these inquiries, it's very helpful!
Thanks, Gwen

Gwendolyn K. Supplee
Life Scientist
U.S. Environmental Protection Agency, Region 3
Air and Radiation Division
Permits Branch (3AD10)
Supplee.Gwendolyn@epa.gov
215-814-2763

From: Wejkszner, Mark <mwejkszner@pa.gov>
Sent: Tuesday, October 06, 2020 11:07 AM
To: Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>; Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>
Cc: aschweitze <aschweitze@pa.gov>; Bertram, Emily <Bertram.Emily@epa.gov>
Subject: RE: [External] Question on Plan Approval for Oxidizer - B Braun Medical

Gwen, there was no request for a public hearing.

Mark J Wejkszner, P.E. | Program Manager
Department of Environmental Protection | Air Quality
Northeast Regional Office
2 Public Square | Wilkes-Barre PA 18701
Phone: 570.826.2528 | Fax: 570.826.2357
www.dep.state.pa.us

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From: Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>
Sent: Tuesday, October 6, 2020 10:57 AM
To: Wejkszner, Mark <mwejkszner@pa.gov>; Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>
Cc: Schweitzer, Andrew <aschweitze@pa.gov>; Bertram, Emily <Bertram.Emily@epa.gov>
Subject: [External] Question on Plan Approval for Oxidizer - B Braun Medical

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Hi Mark –

We had a quick inquiry come in from OAQPS and I'm hoping you can provide an answer to their question – did PADEP hold any public meetings for the Plan Approval associated with the oxidizer installation? If PADEP did – can you provide me with the dates of any meetings that were held?

Many thanks,
-gwen

Gwendolyn K. Supplee
Life Scientist
U.S. Environmental Protection Agency, Region 3
Air and Radiation Division
Permits Branch (3AD10)
Supplee.Gwendolyn@epa.gov
215-814-2763

From: Wejkszner, Mark <mwejkszner@pa.gov>
Sent: Friday, August 21, 2020 8:35 AM
To: Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>; Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>
Cc: aschweitze <aschweitze@pa.gov>; Bertram, Emily <Bertram.Emily@epa.gov>
Subject: RE: [External] Update on Status of Oxidizer - B Braun Medical

Gwen, that facility has no permits and we don't believe they have any sterilization activities at the location.

Thanks,

Mark J Wejkszner, P.E. | Program Manager
Department of Environmental Protection | Air Quality
Northeast Regional Office
2 Public Square | Wilkes-Barre PA 18701
Phone: 570.826.2528 | Fax: 570.826.2357
www.dep.state.pa.us

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From: Wejkszner, Mark
Sent: Thursday, August 20, 2020 11:06 AM
To: Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>; Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>
Cc: Schweitzer, Andrew <aschweitze@pa.gov>; Bertram, Emily <Bertram.Emily@epa.gov>
Subject: RE: [External] Update on Status of Oxidizer - B Braun Medical

I don't believe they have any sterilization or a permit but let me verify with my staff. Andy/Norm can you check on this?

Thanks,

Mark J Wejkszner, P.E. | Program Manager
Department of Environmental Protection | Air Quality
Northeast Regional Office
2 Public Square | Wilkes-Barre PA 18701
Phone: 570.826.2528 | Fax: 570.826.2357
www.dep.state.pa.us

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From: Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>
Sent: Thursday, August 20, 2020 11:01 AM
To: Wejkszner, Mark <mwejkszner@pa.gov>; Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>
Cc: Schweitzer, Andrew <aschweitze@pa.gov>; Bertram, Emily <Bertram.Emily@epa.gov>
Subject: RE: [External] Update on Status of Oxidizer - B Braun Medical

Mark –

I could use your assistance with one more question related to B Braun. Braun has an injection molding facility located in Bethlehem. Do you know whether there are any EtO sterilization activities performed at this facility, and if the facility has a permit? If there is a permit, can you forward me a copy if it is available electronically?

I appreciate your help in tracking down this information.
Many thanks, Gwen

Gwendolyn K. Supplee

Life Scientist
U.S. Environmental Protection Agency, Region 3
Air and Radiation Division
Permits Branch (3AD10)
Supplee.Gwendolyn@epa.gov
215-814-2763

From: Wejkszner, Mark <mwejkszner@pa.gov>
Sent: Wednesday, August 12, 2020 8:43 AM
To: Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>; Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>
Cc: aschweitze <aschweitze@pa.gov>; Bertram, Emily <Bertram.Emily@epa.gov>
Subject: RE: [External] Update on Status of Oxidizer - B Braun Medical

Gwen, we were notified (see attached e-mail) that the new oxidizer has been installed and was commencing operation. Due to COVID restrictions we have not been able to inspect the facility. Let me know if you need more information.

Thanks,

Mark J Wejkszner, P.E. | Program Manager
Department of Environmental Protection | Air Quality
Northeast Regional Office
2 Public Square | Wilkes-Barre PA 18701
Phone: 570.826.2528 | Fax: 570.826.2357
www.dep.state.pa.us

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From: Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>
Sent: Wednesday, August 12, 2020 8:35 AM
To: Wejkszner, Mark <mwejkszner@pa.gov>; Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>
Cc: Schweitzer, Andrew <aschweitze@pa.gov>; Bertram, Emily <Bertram.Emily@epa.gov>
Subject: [External] Update on Status of Oxidizer - B Braun Medical

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Hi Mark –

Hope you are doing well. We are looking for an update on the status of the Oxidizer installation for B Braun Medical. Do you know whether the oxidizer has been installed yet? Based on your last update, construction had stopped due to COVID-19. I wasn't sure when/if construction has resumed and if you knew the status? I appreciate any updates you're able to provide.

Many thanks,
-gwen

Gwendolyn K. Supplee
Life Scientist
U.S. Environmental Protection Agency, Region 3
Air and Radiation Division
Permits Branch (3AD10)
Supplee.Gwendolyn@epa.gov
215-814-2763

From: Wejkszner, Mark <mwejkszner@pa.gov>
Sent: Wednesday, April 29, 2020 11:52 AM
To: Bertram, Emily <Bertram.Emily@epa.gov>; Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>
Cc: Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>; aschweitze <aschweitze@pa.gov>
Subject: RE: [External] RE: Copy of RFD Submitted for B Braun Medical

Emily/Gwendolyn, the dry bed scrubber is installed and operating. They received a plan approval for a new system including a new oxidizer. Last I heard they were installing the new system (RTO) but with COVID-19 construction had to be stopped. I heard they were requesting a waiver from the Governor but I can't confirm if construction has been completed. I can't get access to the RFD but Ray or Norm should be able to.

Below is a writeup of what has been implemented at B. Braun.

On January 31st, 2020, the Department issued a Plan Approval to B. Braun Medical Inc. to construct and operate enhanced emissions control equipment to further reduce emissions associated with B. Braun's medical instrument apparatus sterilization operations. The Plan Approval allows B. Braun to replace the existing Wet Scrubber Deoxx Unit and Catalytic Oxidizer with the Anguil System which consists of a peak shaver and catalytic oxidizer. Based on information provided by Anguil, the Anguil System is expected to achieve 99.9% emissions reduction or, for a lower concentration inlet stream, an exhaust concentration below 1 part per million by volume (ppmv). B. Braun will determine the specific emissions control efficiency via stack testing upon installation. In addition, B. Braun has installed a Dry Bed Unit control device for EtO emissions from the sterilization unit back vents. The Dry Bed Unit is an additional voluntary EtO control device that may further reduce actual EtO emissions. The Dry Bed Unit is expected to achieve greater than 99% emissions reduction which will be confirmed through future stack testing. The Department provided EPA with B. Braun's 2014 facility emissions data for their National Air Toxics Assessment (NATA) modeling project which resulted in the facility's estimated excess lifetime cancer risks exceeding the EPA level of concern of 100 in a million. Because of this study, B. Braun initiated this enhanced control initiative and the Department worked with B. Braun to expedite the review and issuance of the plan approval.

Mark J Wejkszner, P.E. | Program Manager
Department of Environmental Protection | Air Quality
Northeast Regional Office
2 Public Square | Wilkes-Barre PA 18701
Phone: 570.826.2528 | Fax: 570.826.2357
www.dep.state.pa.us

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From: Bertram, Emily <Bertram.Emily@epa.gov>
Sent: Wednesday, April 29, 2020 11:07 AM
To: Kempa, Raymond <rkempa@pa.gov>; Frederick, Norman <nfrederick@pa.gov>
Cc: Wejkszner, Mark <mwejkszner@pa.gov>; Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>
Subject: [External] RE: Copy of RFD Submitted for B Braun Medical

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Additionally, I believe there may have been talk of B Braun installing a new scrubber via a Plan Approval action- do you know a status on that?

Thanks again!

Emily Bertram
Physical Scientist
Permits Branch
Air and Radiation Division
U.S. EPA Region 3
1650 Arch Street, 3AD10
Philadelphia, PA 19103
215-814-5273 | bertram.emily@epa.gov

From: Bertram, Emily
Sent: Wednesday, April 29, 2020 10:44 AM
To: rkempa@pa.gov; nfrederick@pa.gov
Cc: mwejkszner@pa.gov; Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>
Subject: RE: Copy of RFD Submitted for B Braun Medical

Good morning Ray and Norm,

Would either of you know if the control device referenced below has been installed and is it in operation at B. Braun?

Thanks!
Emily

Emily Bertram
Physical Scientist
Permits Branch
Air and Radiation Division
U.S. EPA Region 3
1650 Arch Street, 3AD10
Philadelphia, PA 19103
215-814-5273 | bertram.emily@epa.gov

From: Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>
Sent: Thursday, January 30, 2020 1:25 PM
To: rkempa@pa.gov; nfrederick@pa.gov

Cc: Bertram, Emily <Bertram.Emily@epa.gov>
Subject: Copy of RFD Submitted for B Braun Medical

Hi Ray and Norman –

EPA is looking for a copy of an RFD submitted by B Braun Medical for its' facility located in Allentown, PA. The one we are looking for is Request for Determination No. 7956 for the dry bed scrubber. As we continue to track facilities that use Ethylene Oxide, this is of interest to our Monitoring Group because it involves the installation of a control device. Would it be possible for you to email me a copy of the RFD?

If you have any further, questions, please let me know.
Thanks, Gwen

Gwendolyn K. Supplee
Life Scientist
U.S. Environmental Protection Agency, Region 3
Air and Radiation Division
Permits Branch (3AD10)
Supplee.Gwendolyn@epa.gov
215-814-2763