(b) (6) [redacted]

From: Nam, Ed
Sent: Wednesday, March 13, 2019 8:54 PM
To: Newton, Cheryl; Siegel, Kathryn
Cc: Kelley, Jeff
Subject: RE: EtO Coordination Meeting tomorrow
Attachments: EtO status_3.13.19_clean.docx

Cheryl and Jeff,

Please find a briefing paper attached. Thanks to Margaret Sieffert and Katie for putting it together. Here are some high-level bullets for your report out from the paper:

- The State of Illinois issued a seal order at Sterigenics on 2/15. Sampling to understand ambient concentrations after the seal order continue. A technical meeting with the company is being set up for next week.
- (b) (5) [redacted] ARD reviewed company's fugitive emissions estimate. In coordination with WDNR and OAQPS, we are sending Evonik clarifying questions this week and we will be ready to model soon.
- We are coordinating with IEPA on next steps at Medline (tract-level risk of greater than 100 in a million) and Vantage (not modeled as part of NATA) in Lake County. The agencies will conduct pre- and post-control modeling and hold a meeting with local officials.
- Viant (tract-level risk of greater than 100 in a million) announced that it will stop using EtO later this year. MDEQ held a public meeting on 3/6. MDEQ is planning on another round of ambient monitoring soon.
- There are nine American Contract Systems across the country and two are in Region 5. We believe that seven of the nine are uncontrolled, including the one in Ohio. (b) (5) [redacted]
  (b) (5) [redacted]
- Consistent with OAQPS' two-pronged approach, ARD and states have gathered information from two other facilities – Elé and Cook – to determine if we need to take action in advance of the regulatory review process.
  - Elé conducted voluntary stack test on 11/7 to determine actual emissions. OAQPS is currently reviewing that report.
  - Cook committed to backvent controls at the two chambers that were uncontrolled. Installation is anticipated soon.

Please let us know if you have any questions. We look forward to hearing about the call.

Thanks
-Ed

From: Newton, Cheryl
Sent: Wednesday, March 13, 2019 8:25 AM
To: Siegel, Kathryn <siegel.kathryn@epa.gov>
Cc: Nam, Ed <nam.ed@epa.gov>; Kelley, Jeff <kelley.jeff@epa.gov>
Subject: RE: EtO Coordination Meeting tomorrow

Here you go! Thanks

EtO Coordination Call
3/14/19
AGENDA

FOIA EPA-2021-005139

Welcome, introductions, and purpose of calls (10 minutes)
The two-pronged strategy for addressing ethylene oxide (25 minutes)

1. Status of rules under review
    - Commercial Sterilizers NESHAP
    - Miscellaneous Organic Chemicals NESHAP
2. Gathering additional information on priority facilities
    - Status report-out by region
    - Steps to include as you continue gathering information

Willowbrook Status (10 mins)
Outreach (5 minutes)

- Early Community outreach

Tools OAR will be providing in the coming weeks (5 minutes)
What to anticipate for upcoming calls (5 minutes)

From: Siegel, Kathryn
Sent: Wednesday, March 13, 2019 8:24 AM
To: Newton, Cheryl <Newton.Cheryl@epa.gov>
Cc: Nam, Ed <nam.ed@epa.gov>; Kelley, Jeff <kelley.jeff@epa.gov>
Subject: RE: EtO Coordination Meeting tomorrow

Hi Cheryl,

We're on it and will share later today.

Could you also send the agenda for the meeting, in case there's anything else helpful that we can fill in? Thanks!

From: Newton, Cheryl
Sent: Wednesday, March 13, 2019 8:18 AM
To: Siegel, Kathryn <siegel.kathryn@epa.gov>
Cc: Nam, Ed <nam.ed@epa.gov>; Kelley, Jeff <kelley.jeff@epa.gov>
Subject: FW: EtO Coordination Meeting tomorrow

Hi Katie – This is the national coordination call that Jeff and I are on; we'll see if that is going to work long term. Can I get a couple bullets on our facilities per below? I'm going to have to check in with Kurt if this is going to be the standard time it overlaps with our Thursday DD check-in. Thanks

From: Davis, Alison
Sent: Wednesday, March 13, 2019 8:11 AM
To: Bokun, Lisa <Bokun.Lisa@epa.gov>; Brees, Angela <Brees.Angela@epa.gov>; Chow, Alice <chow.alice@epa.gov>; Fiedler, Kerri <Fiedler.Kerri@epa.gov>; Jenkins, Brandi <Jenkins.Brandi@epa.gov>; Kelley, Jeff <kelley.jeff@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Mitchell, Ken <Mitchell.Ken@epa.gov>; Mylott, Richard <Mylott.Richard@epa.gov>; Newton, Cheryl <Newton.Cheryl@epa.gov>; Nitsch, Chad <Nitsch.Chad@epa.gov>; Ruvo, Richard <Ruvo.Richard@epa.gov>; Seager, Cheryl <Seager.Cheryl@epa.gov>; Smith, Darcie <Smith.Darcie@epa.gov>; Smith, Mark A. <Smith.Marka@epa.gov>; Stenger, Wren <stenger.wren@epa.gov>; Weinstock, Lewis <Weinstock.Lewis@epa.gov>
Cc: Donaldson, Guy <Donaldson.Guy@epa.gov>; Verhalen, Frances <verhalen.frances@epa.gov>; Price, Lisa <Price.Lisa@epa.gov>; Olson, Kyle <Olson.Kyle@epa.gov>
Subject: EtO Coordination Meeting tomorrow

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Hi everyone. Agenda has been added to the calendar invite. Please be ready to provide a brief update (technical and comms) on your priority facilities.

Talk to you tomorrow!
-Alison

FOIA EPA-2021-005139

BRIEFING BY AIR DIVISION ON ETHYLENE OXIDE IN REGION 5
March 13, 2019

MATTER: Ethylene Oxide
INDICATE WHETHER BRIEFING IS DECISIONAL OR INFORMATIONAL: Informational
LOCATION OF SITE OR FACILITY: Region 5
ISSUE SPONSOR: Ed Nam
OTHER INVOLVED DIVISIONS OR OFFICES: N/A

I. SUMMARY

ARD and state agencies have engaged all of the Region 5 facilities that the National Air Toxics Assessment (NATA) identified as having elevated risk from ethylene oxide (EtO). Consistent with OAQPS' two-pronged approach, ARD and states are getting more information from these facilities to determine if we need to take action in advance of the regulatory review process. All of the facilities appear to have understood the risks from EtO before our initial discussions. All have been cooperative and, to date, four are proactively installing control equipment and taking additional steps to reduce EtO emissions. ARD provides updates weekly to the Associate Director for Policy (Mike Koerber) as well as to the Region 5 senior leadership.

II. BACKGROUND

Brief History

- December 2016 – EPA updated EtO from a "probable human carcinogen" to a "human carcinogen"
- January 24, 2017 – NATA version 1 released with EtO remodeling; OAQPS requested that regions review EtO emissions
- June 2017 – ARD began participating in OAQPS/regional EtO workgroup
- end of November 2017 – ARD conducted internal modeling of Sterigenics and Elé, showing potential risk
- December 22, 2017 – ARD sent letters to Sterigenics and Elé, copying IEPA, asking sources to confirm their EtO emissions and modeling parameters, consistent with the NATA review process
- January through March 2018 – ARD contacted Sterigenics after sending them the letter and attempted communications until Sterigenics cut off
- March through May 2018 – ARD and OAQPS designed EtO monitoring plan for Sterigenics
- May 16-18, 2018 – ARD conducted monitoring in Willowbrook
- June 27 and July 16, 2018 – ARD and IEPA met with Sterigenics
- July 27, 2018 – Sterigenics finished routing backvent emissions to scrubber
- August 22, 2018 – EPA released the 2014 NATA
- August 22, 2018 to present
    - ARD and state agencies engaged facilities with elevated risk from EtO, collecting process information, point and fugitive emission calculations and modeling parameters
    - ARD management held weekly calls with OAQPS to update them on actions taken
    - staff participated in bi-weekly calls about sterilizers and chemical manufacturing
- February 27, 2019 – OAQPS prioritized sources with a block-level risk over 1,000 in a million

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Current Status

Facility	Tract Risk	Block Risk	State Involvement	Current Status	Congressional Interest	Local Interest
Evonik Milton, WI chemical plant	40	2,127	▪ working jointly with WDNR staff	▪ first meeting on 10/30 ▪ willing to refine emission calculations and reduce emissions, if necessary ▪ submitted information during shutdown ▪ ARD reviewed company's fugitive emissions estimate, sending comments/questions back this week	▪ none	▪ none
Sterigenics Willowbrook, IL sterilizer	300	753	▪ working jointly with IEPA staff and Julie Armitage	▪ installed backvent controls in July, reducing EtO by an estimated 4,195 lbs or 92% (according to company's estimate) ▪ ARD began ambient monitoring in mid-November and expected to stop at end of March ▪ Illinois issued seal order on 2/15	▪ multiple inquiries from Durbin, Duckworth, Foster, Lipinski, Roskam, and now, Casten	▪ public meeting on November 29th ▪ much interest from local officials and press

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Medline Waukegan, IL sterilizer	300	310	▪ working jointly with IEPA staff and Julie Armitage	▪ committed to backvent controls ▪ IEPA discussing permit application with Medline including control of fugitives ▪ previously anticipated March installation, but expected later ▪ ARD needs to coordinate on modeling with IEPA	▪ multiple inquiries from Durbin, Duckworth, Schneider, and now, Underwood	▪ Lake County Health Department and mayors requested monitoring and may conduct it themselves; held technical call about best monitoring practices on 3/8 ▪ in-person meeting with local officials on 11/28 ▪ interest from local officials and press increasing
Vantage Gurnee, IL chemical plant	EtO emissions not modeled as part of NATA	EtO emissions not modeled as part of NATA	▪ working jointly with IEPA staff and Julie Armitage	▪ committed to install second scrubber by the end of March ▪ after scrubber installation, committed to ambient fenceline monitoring ▪ ARD reviewed company's fugitive emissions estimate ▪ ARD needs to coordinate on modeling with IEPA		

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Viant **f/k/a MedPlast** Grand Rapids, MI sterilizer	100	273	▪ working jointly with MDEQ staff and Mary Ann Dolehanty. MDEQ has lead.	▪ MDEQ alleged violations in July and January ▪ MDEQ conducted ambient monitoring in November and has plans to conduct additional sampling ▪ Viant announced it will stop using EtO later this year, timeline tbd	▪ MDEQ managing communications with elected officials	▪ interest from local officials and press increasing ▪ MDEQ held public meeting on 3/6
Elé McCook, IL chemical plant	60	580	▪ working jointly with IEPA staff and Julie Armitage	▪ conducted voluntary stack test on 11/7 to determine actual emissions ▪ OAQPS reviewing the report	▪ inquiries from Lipinski	▪ inquiries from Cook County
Cook Medical Ellettsville, IN sterilizer	50	505	▪ working jointly with Matt Stuckey of IDEM	▪ committed to backvent controls for the two uncontrolled chambers ▪ anticipate early-winter installation	▪ none	▪ none

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American Contract Systems Tiffin, Ohio and Waunakee, WI sterilizer	EtO emissions not modeled as part of NATA	EtO emissions not modeled as part of NATA	▪ working jointly with Ohio EPA and WDNR staff	▪ newly identified EtO source as of 11/1 with 9 facilities located around US ▪ 7 out of 9 facilities do not have any controls ▪ in discussion with OECA, OAR, and other regions on path forward	▪ none	▪ none

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