Elé corporation

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February 5, 2018

Margaret Sieffert
UEPA, Region 5
Air & Radiation Division
Air Toxics and Assessment Branch
77 W. Jackson Blvd. (AT-181)
Chicago, IL 60604

Re: Response to December 22, 2017 Letter

Dear Ms. Sieffert:

We are in writing in response to USEPA's letter to Mr. John Lapinski of Elé Corporation, dated December 22, 2017. A copy of that letter is enclosed for your convenience.

We appreciate USEPA's offer to work with us on a voluntary basis with regard to our continual efforts to maintain a safe and environmentally responsible workplace and community. While we understand, as stated in your letter, that the carcinogenic designation for ethylene oxide (EtO) has been revised, our emissions of EtO fall well below our permitted emissions limits and our use and emissions of EtO in 2015 and 2016 were below the 2014 level cited in your letter. Further, our emissions control technology for EtO has been tested and proven to be 99.7% effective and our regular monitoring of workers has indicated no adverse exposures to EtO. We believe that our record of compliance – indeed, we have never had a non-compliant emission of EtO – demonstrates our strong commitment to the health and safety of our workers and neighbors.

Your letter suggests that our emissions, although compliant with all environmental regulations, pose a risk to human health by exceeding a "typical" cancer risk acceptability. We query how USEPA arrived at this assumption given the numerous factors that need to be considered in any specific toxicological assessment. As you know, people are exposed to ethylene oxide in their daily lives via automobile exhaust or by smoking tobacco or inhaling second-hand smoke. We, therefore, strongly dispute that the controlled and regulatory compliant EtO emissions from our facility – which are less than the 2014 emissions cited in your letter – present an unacceptable or atypical cancer risk.

Elé Corporation plans to continue to comply with all regulatory requirements with respect to ethylene oxide to protect its workers, neighbors and the environment. Given the above, we do not believe that a meeting with agency personnel is necessary at this time. However, we welcome all information that you can provide concerning voluntary programs that USEPA has developed for our industry that may assist us in our compliance efforts. Please send any such information to my attention.

Sincerely,

John Lesnik
EHSS Manager, Elé Corporation

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