



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF: AT-18J

Via email to: stopetoinlakecounty@gmail.com

Dear Stop EtO in Lake County Members:

Thank you for your letter of February 12, 2022. Administrator Regan asked me to respond on his behalf. Ethylene oxide (EtO) continues to be a high priority for EPA, and we appreciate the engagement of Stop EtO on this important issue. We, with our state partners, have made considerable progress in reducing emissions and risk since the release, in 2018, of the 2014 National Air Toxics Assessment (NATA).

A key element of our approach has been to engage with states and facilities to improve the quantification of EtO emissions, focusing on facilities that were determined to be potential sources of high risk in NATA. In some cases, these improvements have shown that actual EtO emissions were lower than previously reported. In other cases, we have found that emissions were under-reported, for instance when facilities failed to account for fugitive emissions. It also included a situation, at Vantage, where an error in reporting led to leaving an important EtO emissions source out of the 2014 NATA; this error was quickly addressed. These types of revisions are not unusual; close examination of emissions often leads to improved emission inventories. The work we have done to improve EtO emissions estimates gives us much more confidence in our understanding of EtO than we had in 2018.

In addition to our improved understanding of emissions, significant progress has been made in reducing actual emissions. Illinois EPA has been far ahead of our federal regulations to reduce emissions. Illinois has applied significant, nation-leading requirements for both emissions controls and continuous emissions monitoring at Medline and Vantage. Our work on protecting the public from EtO risks continues, at the federal and state levels. At the federal level, our focus is on revising nationwide regulations for the most significant sources of EtO emissions, including commercial sterilizers and chemical plants. In addition, EPA is leading the development of improved monitoring techniques for identifying EtO problems and understanding background concentrations of atmospheric EtO. Illinois EPA's focus is the implementation and enforcement of existing state laws and permits, including through annual inspections, annual stack tests, and review of quarterly emissions reports. Illinois EPA has not identified any compliance issues at Medline and Vantage, and review of the quarterly reports available on Illinois EPA's website confirms that both facilities are emitting at levels well below their permit limits.

As I described in my September 29, 2021 letter to Sandra Hart of the Lake County Board, the best evidence for the EtO impact of Medline and Vantage comes from Illinois EPA's modeling of the maximum permitted emissions from the two facilities, along with the indications from the high-quality source monitoring data that actual emissions are below the permitted levels. Given the limitations of current traditional ambient monitoring techniques at the low concentrations expected in this situation, we do not believe that we would get better information through additional ambient monitoring at this time.

Thank you again for your engagement on EtO. From our previous meetings, we are aware of your concerns, and I hope that our past discussions and this response have helped address them. If you have new information or would like to meet with me to discuss, please let me know.

Sincerely,

John Mooney
Director
Air and Radiation Division