



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

July 19, 2019

OFFICE OF
AIR AND RADIATION

Mr. Richard Moore
Chairman
National Environmental Justice Advisory Council
Los Jardines Institute
803 La Vega Drive, SW
Albuquerque, New Mexico 87105

Dear Chairman Moore:

Thank you for your May 2, 2019 letter regarding ethylene oxide. Addressing this chemical is a high priority for the U.S. Environmental Protection Agency (EPA), and I appreciate the time and thought the National Environmental Justice Advisory Council (NEJAC) have put into discussing this issue.

Your letter requested a response on the following three points:

- Continued use of the best available science, including the 2016 IRIS value
- Additional information on the agency's efforts to address emissions of ethylene oxide from the industrial sources the agency has identified, and
- That the Agency take prompt regulatory action to reduce ethylene oxide emissions from chemical manufacturing and other sources, together with other toxic pollutants that includes notice-and-comment rulemaking.

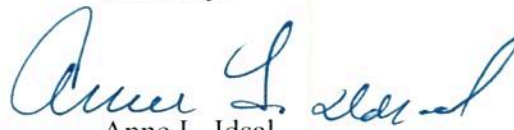
EPA is taking a two-pronged approach to address industrial emissions of ethylene oxide. Under the first prong, we are reviewing regulations. EPA intends to use the best available science, including assessment of risk based on the 2016 IRIS value and other key inputs. We have begun our review of regulations with the NESHAP for Miscellaneous Organic Chemical Manufacturing and the NESHAP for Commercial Sterilizers and expect to propose updates to both of those rules later this summer. Both proposals will be open for public comment, and we anticipate holding public hearings. We plan to offer communities webinars during the comment period on the proposed rules to provide information on preparing written comments and speaking at public hearings, as noted above. We are evaluating possible schedules for review of the other rules that directly regulate ethylene oxide, including the NESHAPs for the Polyether Polyols Production, the Synthetic Organic Chemical Manufacturing Industry, Hospital Sterilizers, and Chemical Manufacturing Area Sources. Separately, the Agency expects to issue a proposal addressing *ethylene* production shortly. While that proposal will include information about risks from ethylene oxide, much like the proposed rule for Hydrochloric Acid Production, it does not directly regulate processes and equipment that are sources of ethylene oxide emissions.

In the second prong of our approach to address ethylene oxide, EPA is working with our state and local agency partners to examine emissions from facilities in census tracts identified by the most recent National Air Toxics Assessment (NATA) as potentially having the highest risks from ethylene oxide. That work serves two purposes: it provides information that may be helpful to us as we review our regulations, and it helps us determine whether there are opportunities for facilities to make early reductions. This work is at various stages and may include a range of tasks to verify and update emissions information to help us better understand potential risks including permit reviews, site visits, and stack tests, among others. This emissions verification work is the type of closer check that NATA envisions: the assessment is a screening tool, intended to help state and local air agencies identify locations or pollutants for further examination, so that we can understand risk using the best data available to us.

Additional information on the Agency's work to address ethylene oxide in Willowbrook, Illinois is available at <https://www.epa.gov/il/sterigenics-willowbrook-facility>.

Again, thank you for your letter. I look forward to the NEJAC's continued advice on this issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "Anne L. Idsal". The signature is fluid and cursive, with a large initial "A" and a long, sweeping tail.

Anne L. Idsal
Acting Assistant Administrator