



South Coast Air Quality Management District

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Via Email and Certified Mail with return receipt

May 6, 2022

Kevin Wagner
VP Environmental Health & Safety
Sterigenics US, Inc.
4801-63 E 50th St.
Los Angeles, CA 90058-2709

Sterigenics US, Inc.
4900 Gifford Ave.
Los Angeles, CA 90058-2785

Subject: Notice that Sterigenics US, Inc. (South Coast AQMD IDs: 126191 & 126197) May Be Designated as a Potentially High-Risk Level Facility

Dear Mr. Wagner:

Pursuant to South Coast AQMD Rule 1402(g), South Coast AQMD is notifying you that Sterigenics US, Inc. (Sterigenics) may be designated as a Potentially High Risk Level Facility.¹ As discussed below, South Coast AQMD has monitored significantly elevated levels of ethylene oxide, a highly toxic chemical, in the vicinity of where your facilities are located.² If these levels have persisted over a long term period, the estimated cancer risk level would exceed South Coast AQMD significance thresholds. South Coast AQMD needs to expeditiously determine whether your facility contributes to this high level of risk. Based on further information gathered independently and from your facility, South Coast AQMD may designate your facility as a Potentially High Risk Level Facility. If your facility is designated as a Potentially High Risk Level Facility, you will be required to expeditiously reduce risks from your facility and provide reports on your toxic emissions and potential health risks to the surrounding community. Details on the evidence regarding this designation and possible next steps are described below.

¹ Pursuant to Rule 1402 (c)(14), a Potentially High Risk Level Facility is a facility for which the Executive Officer has determined that emissions data, ambient data, or data from a previously approved Health Risk Assessment indicate that the facility has a likely potential to either exceed or has exceeded a Significant Risk Level. Pursuant to Rule 1402 (c)(19), a Significant Risk Level for purposes of this letter is a cancer risk where the Maximum Individual Cancer Risk is greater than 100 in-a-million.

<http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf>

² Operations are currently identified by two facility IDs. South Coast AQMD is evaluating whether the operations together constitute a single facility as defined in Rule 1402 (c)(5), as would align with federal requirements.

Summary of Available Information Regarding Air Quality Impacts from Sterigenics

Ambient Air Quality Monitoring Data

South Coast AQMD staff collected 24-hour air monitoring samples nearby the Sterigenics facility and found elevated levels of ethylene oxide at the 49th street parking lot location (Site #1). Figure 1 shows the sampling locations and measured concentrations. The range of concentrations from the South Coast AQMD downtown Los Angeles regional monitoring station is 0.01 to 0.17 ppb. For context, using the Office of Environmental Health Hazard Assessment (OEHHA) risk methodology, 3.18 ppb would present a cancer risk of 100 chances per million to offsite workers. As seen in Figure 1, the average level of 63.9 ppb of ethylene oxide near your facility (Site #1) are substantially higher than 3.18 ppb, which could result in cancer risks well over the Rule 1402(c)(19) significance risk threshold of 100 chances per million. In addition to known process emissions from permitted equipment, recent sampling inside your facility found that there are multiple units and processes with fugitive ethylene oxide emissions. Lower monitored levels have also been found at monitors located upwind and downwind and farther from your facility, indicating that Sterigenics is the likely source of ethylene oxide found in these areas. Preliminary information shows that estimated health risks at worker sites near Sterigenics are of greatest concern. Preliminary grab samples in the nearest community about 500 feet away (Figure 2) are similar to levels found at the downtown Los Angeles regional monitor.

Figure 1 – Sampling Locations and Measured Concentrations (ppbv) near Sterigenics



Figure 2 – Preliminary Grab Samples in Nearest Community



Facility Visit by South Coast AQMD Staff

As you are aware, South Coast AQMD staff visited your facilities on March 31, 2022, and has had subsequent discussions with facility staff since that time. During the visit, South Coast AQMD staff noted that there were potential sources of ethylene oxide fugitive emissions from the chambers, transport, post-aeration, warehouse, and other parts of the facility.

Designation as a Potentially High Risk Level Facility

Based on the evidence presented above, your facility may be designated as a Potentially High Risk Level Facility pursuant to Rule 1402(g). Prior to making this designation, you are required to confer with us so that you can present any additional relevant information to us as we consider this designation. Please contact me at (909) 396-3244 no later than 5 business days from the date of this letter to schedule a conference.

Rule 1402 Requirements for Potentially High Risk Level Facilities

If designated as a Potentially High Risk Level Facility, Sterigenics will be required to submit an Early Action Reduction Plan, an Air Toxics Emission Inventory Report, a Health Risk Assessment, and a Risk Reduction Plan. The timeline for each submittal is outlined below. Each of the due dates below would be measured from the date of notification by the South Coast AQMD that your facility is a Potentially High Risk Level Facility.

Deliverable	Due Date	Rule Reference
Initial Information for ATIR	30 days	1402(d)(1)
Early Action Risk Reduction Plan	90 days	1402(g)(2)
Air Toxics Inventory Report	150 days	1402(d)(2)
Health Risk Assessment	180 days	1402(g)(3)
Risk Reduction Plan	180 days	1402(g)(4)

Further, Sterigenics will be required to conduct public notification within 30 days after the HRA is approved and will need to implement the Early Action Risk Reduction Plan according to the schedule approved by South Coast AQMD. The final Risk Reduction Plan will also need to be implemented as soon as feasible, but no later than two years after the Risk Reduction Plan is approved. Sterigenics is strongly encouraged to aggressively reduce risks to the surrounding neighborhood as quickly as possible and faster than the timeline provided above.

Guidelines for Preparing Rule 1402 Deliverables

Guidance for preparing each of the previously mentioned documents can be found online in the South Coast AQMD AB 2588 Supplemental Guidelines available here:

<http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab-2588-supplemental-guidelines.pdf>

The California Air Resources Board (CARB) has developed the “Hot Spots” Analysis and Reporting Program (HARP), which includes the emissions inventory and risk assessment requirements of the “Hot Spots” Program in a set of program modules. ATIRs must be prepared with the Emission Inventory Module (EIM) module of HARP, and HRAs must be prepared using the Air Dispersion and Risk Management Tool (ADMRT) module of HARP. A free copy of the HARP software is available here:

<https://ww2.arb.ca.gov/our-work/programs/hot-spots-analysis-reporting-program>

Additional guidance for preparing ATIRs is available in CARB’s Emission Inventory Criteria and Guidelines here:

<https://ww3.arb.ca.gov/ab2588/2588guid.htm>

Guidance for preparing HRAs is available from the OEHHA here:

<https://oehha.ca.gov/air/crn/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>

If you have any questions, please feel free to contact me at (909) 396-3244 or Victoria Moaveni, Program Supervisor at (909) 396-2455.

Sincerely,



Ian MacMillan
Assistant Deputy Executive Officer
Planning, Rule Development & Area Sources

IM:EK:VM