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11 South Coast Air Quality Management District

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BEFORE THE HEARING BOARD OF THE  
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**In the Matter of**

SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT,

Petitioner,

v.

STERIGENICS US, LLC  
[Facility ID Nos. 126197 and 126191]

Respondent.

CASE NO. 6225-1

**NOTICE OF INTENT TO  
INTRODUCE DOCUMENTS AS  
EXHIBITS**

**On Hearing a Petition for Order for  
Abatement  
[STIPULATED]**

Health & Safety Code § 41700,  
District Rule 402

Date: August 9, 2022  
Time: 9:00 a.m.  
Place: 21865 Copley Drive  
Diamond Bar, CA 91765

PETITIONER hereby offers notice of intent to introduce witness declarations, copies of which are attached, as exhibits on the hearing of the Petition for Order for Abatement [Stipulated] in the above-captioned matter. The declarants are expected to be additionally available to be called as witnesses and examined or cross-examined on any matter relevant to the issues. This voluntary filing merely provides courtesy notice and the possibility of advance review of written materials that Petitioner intends to introduce as evidence at hearing.

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DATED: August 4, 2022

SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT

By: \_\_\_\_\_  
Brian Tomasovic  
Attorney for Petitioner

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 4, 2022, I emailed Petitioner's Notice of Intent to Introduce Documents as Exhibits in Case No. 6225-1 to the Clerk of the South Coast AQMD Hearing Board with accompanying emailed service on the counsel for Respondent, Ms. Maya Grasse, at Maya.Grasse@aslston.com. The Respondent in this case has agreed to accept emailed service of documents as acknowledged in an email by Respondent's counsel to the clerk on July 15, 2022.

*Declaration of Angela Haar*

1 **DECLARATION OF ANGELA HAAR, PH.D.**

2 I, ANGELA HAAR, declare:

3 1. I am employed as a Principal Air Quality Chemist in the Monitoring & Analysis  
4 Division of the South Coast Air Quality Management District (“District”). Unless otherwise stated  
5 expressly below, I make this declaration based on personal knowledge and, if called as a witness in  
6 this action, could and would testify competently to the matters discussed herein.

7 2. I have served as a Principal Air Quality Chemist at the District since 2019. My  
8 responsibilities as a Principal Air Quality Chemist include supervising the District’s qualitative and  
9 quantitative analyses to identify and quantify air contaminants. I hold two Bachelor of Science  
10 degrees, one in Chemistry and the other in Earth and Environmental Science from the University of  
11 California, Irvine. I have a Master of Science and a Doctor of Philosophy in Chemistry (specializing  
12 in Atmospheric/Analytical Chemistry), also from the University of California, Irvine. My areas of  
13 expertise and professional experience are focused on air monitoring, atmospheric chemistry, and  
14 laboratory analytical techniques including gas chromatography, mass spectrometry, and spectroscopy  
15 among others.

16 3. Since April 2022, I have visited the operations of Respondent Sterigenics in Vernon or  
17 the surrounding vicinity of those operations at least two times. I am familiar with the buildings in  
18 Vernon designated as Facility ID Nos. 126197 and 126191 with facility addresses 4900 S. Gifford  
19 Ave. and 4801-63 E. 50th Street, respectively, in Los Angeles, California 90058, and referred to as  
20 the Vernon Facilities in the Petition for Order for Abatement. I am personally knowledgeable in the  
21 details of the District’s activities to monitor Ethylene Oxide (“EtO”) at or around the Vernon  
22 facilities. Specifically, I am part of the District’s monitoring team that has been dedicated to sample  
23 collection and the lab analysis and verification of all sample results by approved test methods.

24 4. Beginning in or around April 2022, the District began ambient air monitoring for EtO  
25 by collecting 24-hours samples in and around the Vernon Facilities, specifically at a site located  
26 downwind of the Vernon Facilities on 49th Street (“49th St. site”). Two more monitors were set up in  
27 May 2022, one on Gifford Avenue (“Gifford site”) and one in the nearest residential community on  
28 Fruitland Avenue (“Fruitland site”). Presently, the District has set up two air monitoring locations  
around the Vernon Facilities and one community air monitoring location at the Fruitland site to

1 measure ambient EtO levels. Information about these efforts can be found on the District’s website at  
2 <http://www.aqmd.gov/sterigenics> (as of August 2, 2022) [“Sterigenics Investigation Page”].

3 5. I and other District staff conducted the local air sampling to determine levels of EtO in  
4 the surrounding community and to evaluate potential sources of emissions coming from the Vernon  
5 Facilities. Attached as Attachment 1 is a true and correct copy of Figure 1<sup>1</sup> from the Sterigenics  
6 Investigation Page. Figure 1 shows the locations of individual “grab samples” (air samples which are  
7 collected at one location at one point in time) that were taken near the Vernon Facilities.

8 6. Attached as Attachment 2 is a true and correct copy of Figure 2 from the Sterigenics  
9 Investigation Page. Figure 2 shows levels of EtO in the community based on grab samples that were  
10 obtained near the surrounding community and closest school. The data collected so far shows the  
11 concentrations near the surrounding community and closest school to not be elevated as compared to  
12 known results typical of other urban air monitors also maintained by South Coast AQMD.

13 7. Attached as Attachment 3 is a true and correct copy of Figure 3 from the Sterigenics  
14 Investigation Page. Figure 3 shows the location of each of the 24-hour sampling locations that  
15 initiated monitoring from April 2022 to the time of this declaration.

16 8. Attached as Attachment 4 is a true and correct copy of Figure 4 from the Sterigenics  
17 Investigation Page. Figure 4 is a time series plot which shows the EtO concentrations at each 24-  
18 hour sampling site from April 22, 2022 through and including July 25, 2022 locations.

19 9. Attached as Attachment 5 is a true and correct copy of Figure 5 from the Sterigenics  
20 Investigation Page. Figure 5 is a table which lists the EtO concentrations from each 24-hour  
21 sampling site from April 22, 2022 through and including July 25, 2022.

22 10. Measurements from the District’s monitors may vary according to a facility’s operations  
23 and extant environmental conditions, such as prevailing wind direction or rain on the day the  
24 measurement is taken. Based upon my knowledge and observations of the Vernon Facilities’  
25 operations, monitored levels of EtO, prevailing wind directions, and other environmental conditions,  
26 I believe that the elevated levels of ambient EtO concentrations at or around the Vernon Facilities are  
27 due in part to fugitive emissions from Respondent’s operations.  
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<sup>1</sup> Copies of Figures 1 through Figure 5 may be viewed online at the Sterigenics Investigation Page.

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11. I have reviewed the stipulated proposed conditions for long-term air monitoring to measure ambient air levels of EtO. These conditions reflect the professional input and technical judgment of the District's Monitoring & Analysis Division staff experts on how to conduct ongoing air monitoring to best maintain consistency and continuity with the District's existing monitoring efforts. Compliance with the stipulated conditions relating to ambient air monitoring will ensure appropriate and active oversight on the effectiveness of actions taken by Respondent to reduce emissions.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

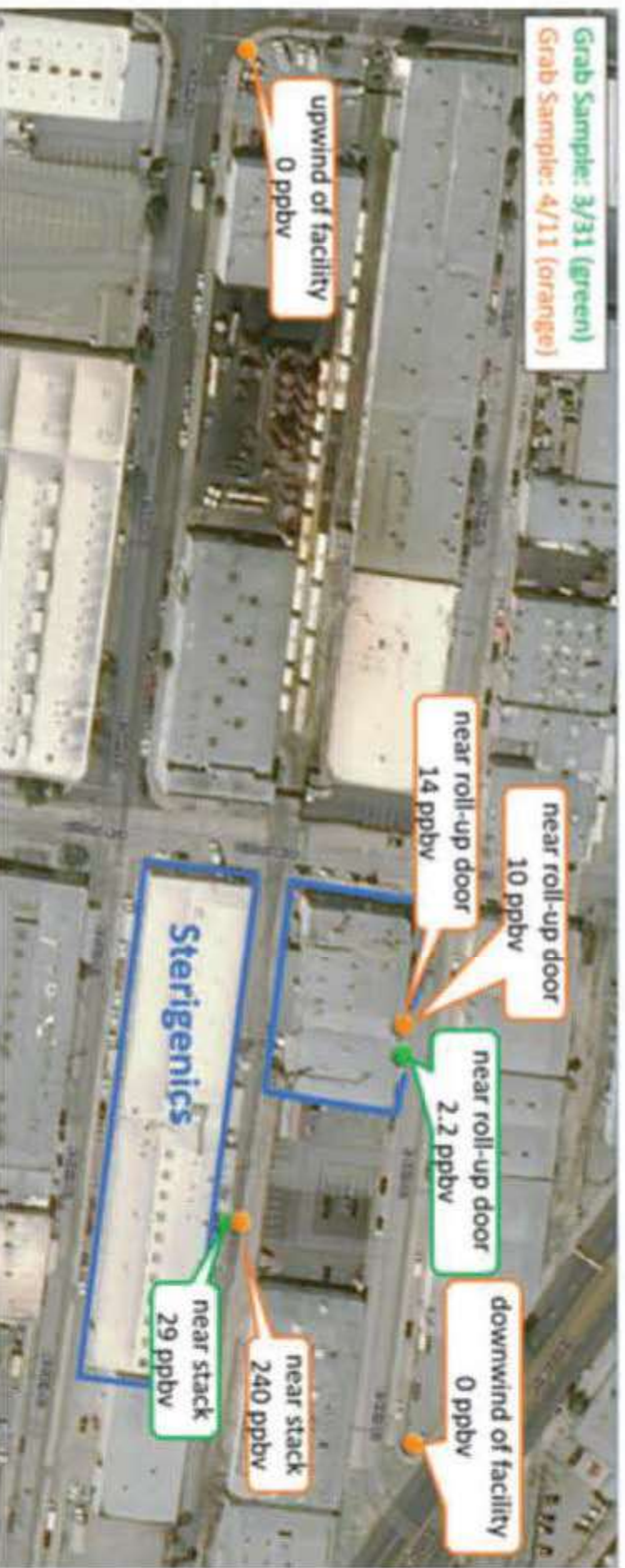
Executed on August 2, 2022 at Henderson, Nevada.

  
ANGELA HAAR, PH.D.

# Attachment 1



## Grab Samples



**Figure 1.** Map of grab samples. Concentrations are in parts per billion volume (ppbv).

## Attachment 2

## Community Grab Samples



**Figure 2.** Map of community grab samples. Concentrations are in parts per billion volume (ppbv).

# Attachment 3

### 24-Hour Integrated Sample Locations



Figure 3. Map of 24-hour sampling locations.

# Attachment 4

### 24-Hour Samples

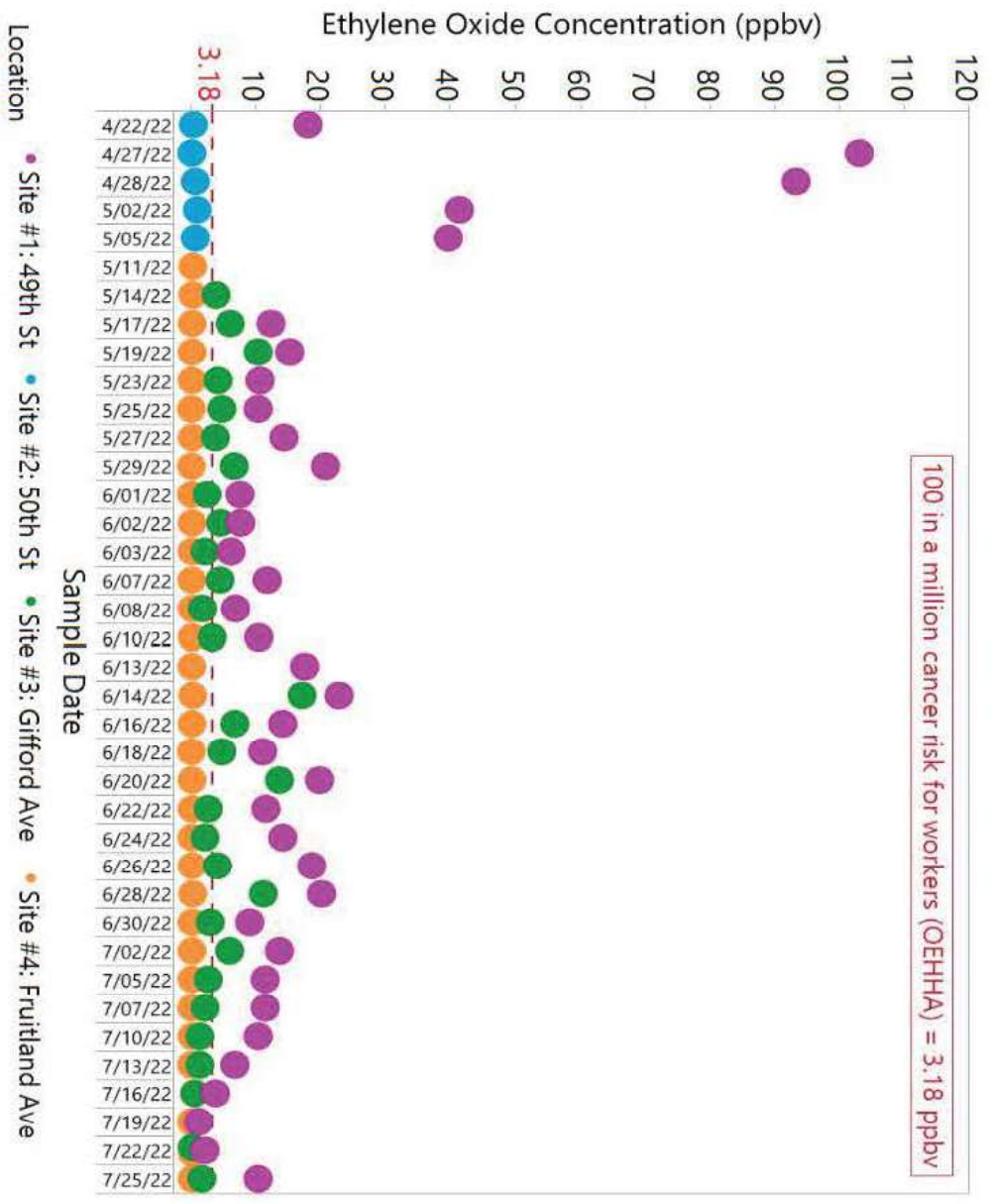


Figure 4. Plot of 24-hour time integrated sample concentrations.

# Attachment 5



Sample Begin Time	Site #1 (49th St.)	Site #2 (50th St.)*	Site #3 (Gifford Ave.)	Site #4 (Fruitland Ave.)
04/22/2022 12:00	18	0.3		
04/27/2022 00:00	103	0.07		
04/28/2022 12:00	93.2	0.6		
05/02/2022 00:00	41.4	0.9		
05/05/2022 00:01	39.7	0.6		
05/11/2022 00:01	Invalid		Invalid	0.2
05/14/2022 00:00	Invalid		3.8	0.2
05/17/2022 00:00	12.3		6.0	0.1
05/19/2022 00:00	15.2		10.3	0.1
05/23/2022 00:00	10.6		4.1	0.08
05/25/2022 00:00	10.3		4.7	ND
05/27/2022 00:00	14.3		3.7	0.1
05/29/2022 00:00	20.7		6.6	ND
06/01/2022 00:00	7.5		2.4	ND
06/02/2022 00:00	7.6		4.5	0.1
06/03/2022 00:00	6.1		2.1	0.1
06/07/2022 00:00	11.7		4.4	0.05
06/08/2022 00:00	6.8		1.7	0.1
06/10/2022 12:00	10.4		3.2	0.1
06/13/2022 12:00	17.5		Not Sampled	0.06
06/14/2022 12:00	22.8		17.1	0.2
06/16/2022 12:00	14.1		6.7	0.09
06/18/2022 12:00	11.0		4.7	ND
06/20/2022 12:00	19.8		13.6	0.08
06/22/2022 12:00	11.5		2.6	0.08
06/24/2022 12:00	14.1		2.1	0.06
06/26/2022 12:00	18.6		4.0	0.1
06/28/2022 12:00	20.1		11.1	0.2
06/30/2022 12:00	9.0		2.9	0.07
07/02/2022 12:00	13.6		5.9	0.09
07/05/2022 12:00	11.4		2.6	0.07
07/07/2022 12:00	11.4		2.1	0.05
07/10/2022 12:00	10.3		1.3	0.09
07/13/2022 12:00	6.7		1.3	ND
07/16/2022 12:00	3.7		0.5	Invalid
07/19/2022 12:00	1.1		Invalid	ND
07/22/2022 12:00	2.1		0.2	0.08
07/25/2022 12:00	10.3		1.6	0.1

\*Discontinued sampling at Site 2

ND - Not Detected

Figure 5: 24-hour Time-integrated Sample data (concentrations in ppbv)

*Declaration of Jason Aspell*

1 **DECLARATION OF JASON ASPELL**

2 1. I, JASON ASPELL, declare:

3 2. I am the Deputy Executive Officer for the Engineering and Permitting Division (E&P) of  
4 the South Coast Air Quality Management District (District). Unless otherwise stated expressly  
5 below, I make this declaration based on personal knowledge and, if called as a witness in this  
6 action, could and would testify competently to the matters discussed herein.

7 3. I have worked for the District for over 20 years, and I currently oversee operations and staff  
8 with responsibility for the District's permit system. Prior to my current position, I was a Senior  
9 Enforcement Manager of the Toxics and Waste Management team. Earlier in my career, I held  
10 various positions involved in source testing, technology review programs and policies, permit  
11 engineering, and inspections and enforcement. I hold a B.S. in Chemical Engineering from UCLA  
12 and a M.S. in Industrial Hygiene from the University of Montana.

13 4. I am familiar with the Respondent Sterigenics' facilities in Vernon that are the subject of  
14 the petition in this case, and I am also familiar with the District's community investigation into  
15 elevated readings of ethylene oxide (EtO) in relation to the Vernon facilities. I have visited these  
16 facilities several times and examined Sterigenics' currently submitted and pending permit  
17 applications, as well as many of the historical engineering files for the facilities. Thus, I am  
18 familiar with the equipment, facility locations and layout, and the pending permit applications for  
19 the facilities.

20 5. If the Order for Abatement is issued with the parties' proposed stipulated conditions, the  
21 facilities would be subject to conditions for interim control measures, testing, and air monitoring  
22 until the facilities install and operate permanent total enclosures (PTEs) consistent with U.S. EPA  
23 Method 204 or as otherwise specified in the permits that will be issued by the District. The  
24 Respondent has already submitted to the District applications with appropriate expediting fees for  
25 permits to install and operate the PTEs. The principle behind PTEs is that the buildings will run  
26 under negative pressure, meaning that no air will leave the buildings without first being  
27 appropriately routed to control equipment. Additionally, inward air velocities at building openings  
28 and distances from emission sources to building openings are also evaluated to minimize the

1 potential for fugitive emissions to escape the PTE. This will help address possible sources of  
2 fugitive or uncaptured emissions from the sterilization process or from post-sterilization processes  
3 that are not otherwise fully captured and routed to control equipment, such as wet scrubbers or  
4 catalytic oxidizers. While the proposed stipulated conditions for interim control measures are  
5 important, PTEs are the ultimate objective. These have been achieved in practice for this class of  
6 source, and PTEs are highly likely to be the most stringent emissions control technique.

7 6. Currently, the District is looking to revise its Rule 1405 on *Control of Ethylene Oxide and*  
8 *Chlorofluorocarbon Emissions from Sterilization or Fumigation Processes*, which applies to the  
9 Vernon facilities. The U.S. EPA may also in the next several years update its hazardous air  
10 pollutant standards in 40 CFR Part 63, subpart O (Subpart O), which specifically regulates  
11 emissions of EtO from commercial sterilization operations. Subpart O also applies to  
12 Respondent's operations. Last, in June 2022, Respondent's facilities in Vernon were designated a  
13 Potentially High Risk Level Facility under South Coast AQMD Rule 1402, which will separately  
14 require a plan to reduce health risk caused by EtO levels. While it is possible the Vernon facilities  
15 will face additional or more detailed requirements under its future permits and these other ongoing  
16 efforts, achieving compliance with the proposed stipulated conditions should enhance the  
17 Respondent's ability to comply more quickly and adeptly and, most importantly, help reduce EtO  
18 emissions on an aggressive but still feasible timeline.

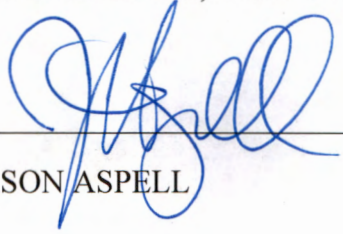
19 7. In addition, the stipulated proposed conditions are supported by requirements for long-term  
20 air monitoring to measure ambient air levels of EtO that would maintain some consistency with the  
21 District's existing monitoring efforts. The purpose of ongoing air monitoring is to demonstrate the  
22 effectiveness of actions taken by Respondent to reduce emissions.

23 8. The stipulated proposed conditions are the product of significant technical and engineering  
24 exchanges between Respondent's team and the staff of the District. The proposed conditions have  
25 been developed to promote continued work to reduce emissions and to reduce potential exposures  
26 in the community, while also recognizing that further detailed engineering plans and evaluations  
27 will still be needed both to satisfy the conditions of the abatement order and to successfully permit  
28 any new controls and equipment.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 3rd day of August, 2022, at Diamond Bar, California.

  
\_\_\_\_\_  
JASON ASPELL

*Declaration of Fortune Chen*

1 **DECLARATION OF FORTUNE CHEN**

2 1. I, Fortune Chen, declare:

3 2. I am a Senior Air Quality Engineer for the Planning, Rule Development & Implementation  
4 Division for the South Coast Air Quality Management District (District). Unless otherwise stated  
5 expressly below, I make this declaration based on personal knowledge and, if called as a witness in  
6 this action, could and would testify competently to the matters discussed herein.

7 3. I received my Master of Science degree in Environmental Engineering from University of  
8 Southern California. I also received my Bachelor of Arts degree in Quantitative Economics and  
9 Decision Sciences from University of California San Diego.

10 4. Prior to my employment at the District, I was an air quality engineer at environmental  
11 consulting firms for four years. I have been employed at the District since January 1999, and as an  
12 air quality engineer since January 2000. I have held my current position as a Senior Air Quality  
13 Engineer since August 2016. As part of my duties as Senior Air Quality Engineer, I have reviewed  
14 dozens of Air Toxic Inventory Reports and Health Risk Assessments under the Air Toxics “Hot  
15 Spots” Information and Assessment Act, or AB 2588, that compare modeled or measured pollutant  
16 levels to various standards that exist to protect public health.

17 5. As relevant to this case (Case No. 6225-1), I am knowledgeable in the health effects of  
18 ethylene oxide (EtO) exposure. In the program implementation requirements for AB 2588, EtO is  
19 identified as a toxic air contaminant. Health Risk Assessments conducted under the AB 2588  
20 Program must evaluate associated health risks posed by facilities that release EtO. District Rule  
21 1401, *New Source Review of Toxic Air Contaminants*, lists EtO in Table 1 as a toxic air  
22 contaminant, and identifies that it has carcinogenic and chronic risk values. EtO is also a toxic air  
23 contaminant under both AB 2588 and District Rule 1401, *Control of Toxic Air Contaminants from*  
24 *Existing Sources*, because it is an air pollutant which may pose a present or potential hazard to  
25 human health as listed by California’s Office of Environmental Health Hazard Assessment  
26 (OEHHA). Specifically, EtO has been identified by OEHHA as a known human carcinogen by  
27 inhalation. EtO has also been identified by U.S. EPA as a known human carcinogen.

28 6. District staff are required to use health values and methodologies developed by OEHHA

1 when estimating health risk in its air toxics program. Using OEHHA health values and  
2 methodology, EtO concentrations of 3.18 parts per billion (ppb) would pose a significant risk of  
3 cancer incidence of 100 in a million for a 25-year worker exposure. Exposures are a “significant”  
4 risk per the definitions in District Rule 1402(c)(10) and (c)(19), which sets a significant risk level  
5 that includes cancer risk of 100 in a million. Rule 1402 implements AB 2588 and includes a  
6 requirement to establish a significant risk level and a requirement to reduce emissions below the  
7 significant risk level within a specified timeline.

8 7. According to District Rule 1402(g)(2), within 90 days of the District’s notification  
9 that a facility has been designated a Potentially High Risk Level Facility, the facility must submit  
10 an Early Action Reduction Plan that identifies measures that can be implemented immediately to  
11 reduce the facility-wide health risk. As of June 7, 2022, South Coast AQMD designated the  
12 Vernon Facilities as a Potentially High Risk Level Facility.

13 8. According to District Rule 1402(f)(3)(A)(iv), a facility that has been designated a  
14 Potentially High Risk Level Facility must reduce the cancer risk impact of total facility emissions  
15 to 25 in a million according to OEHHA health values and methodology as quickly as feasible, but  
16 no later than two years from approval of the Risk Reduction Plan.

17 9. I have studied several area maps of Respondent’s Facilities in Vernon. From an aerial view  
18 perspective, I am familiar with the location of monitors that were placed at the facilities to  
19 investigate EtO emissions in the area. The monitor that has indicated highest readings since April  
20 22, 2022 is located at the 49<sup>th</sup> St. Site and is proximate to working area for off-site workers. All  
21 district monitoring outside the fenceline of the Vernon Facilities aims to sample and quantify EtO  
22 in the ambient air to which the public has access, but the 49<sup>th</sup> St. Site is considered a receptor  
23 location for risk calculation purposes. Using the average EtO concentrations measured between  
24 April 22, 2022 and July 25, 2022, of 18.3 ppb, I have calculated the estimated cancer risk based on  
25 the risk assessment guidelines published by OEHHA in 2015, based on a 25-year worker exposure.  
26 The estimated cancer risk is 575 in a million.

27 10. At the time of this declaration, the average of the four lowest concentrations sampled from  
28 the 49<sup>th</sup> Street site was 3.25 ppb, which remains above the 100 in a million significant risk level



1 and indicates further control measures will be needed through compliance with an abatement order,  
2 through the addition or improvement of control equipment, and through implementation of a risk  
3 reduction plan under District Rule 1402.

4  
5 I declare under penalty of perjury under the laws of the State of California that the  
6 foregoing is true and correct.

7 Executed this 3rd day of August, 2022, at Diamond Bar, California.

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Fortune Chen

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*Declaration of Dr. Nichole Quick*

1 **DECLARATION OF DR. NICHOLE QUICK**

2 1. I, NICHOLE QUICK, declare:

3 2. I am a contracted health effects consultant for the South Coast Air Quality Management  
4 District (District). Unless otherwise stated expressly below, I make this declaration based on  
5 personal knowledge and, if called as a witness in this action, could and would testify competently  
6 to the matters discussed herein.

7 3. I have served as a contracted consultant for the District since November, 2021. I hold a  
8 Doctor of Medicine from the University of Utah School of Medicine and a Master of Public  
9 Health-Environmental Health from San Diego State University. Currently, I am the Medical  
10 Director for KCS Health Center, which provides community health services in Orange County. I  
11 am also the Director of the Health Facilities Inspection Division at LA County Department of  
12 Public Health. Prior to this, I was the County Health Officer for Yuba County and subsequently the  
13 County of Orange, where I occasionally interfaced with air quality management districts and their  
14 work centering on the public health concerns of air pollution.

15 4. Currently, the District has a vacant position for a Health Effects Officer, who would be a  
16 program director and technical specialist on the health effects of air pollution. My consulting role  
17 for the District is similar. Specifically, I provide expertise on the health effects of air pollution,  
18 referencing applicable technical, public health and toxicological literature and using my  
19 background in medical and environmental health.

20 5. I am familiar with ethylene oxide (EtO) as toxic or hazardous air pollutant that is regulated  
21 by the District and the U.S. Environmental Protection Agency (EPA). I am generally familiar with  
22 the toxicological profile for ethylene oxide, including the September 2020 Draft for Public  
23 Comment by the U.S. Agency for Toxic Substances and Disease Registry (ATSDR), and the  
24 designation of this gas as a human carcinogen according to state, federal, and international public  
25 health officials. Specifically, there is scientific consensus based on the latest peer-reviewed  
26 evidence that exposures to EtO increase the risk of lymphohematopoietic cancers (including non-  
27 Hodgkin lymphoma, myeloma, and lymphocytic leukemia) and, for females, breast cancer.

28 6. I have engaged with District staff in the weeks after it began monitoring in the City of

1 Vernon and detected elevated levels of EtO in proximity to the Respondent's sterilization facilities.  
2 I have reviewed the other declarations being submitted by the Petitioner for Case No. 6225-1, and  
3 they provide information that is consistent with the District's publicly posted website information  
4 on community investigations for the Sterigenics Facilities in Vernon, CA.

5 7. For its health risk programs, the District uses the methodologies of California's Office of  
6 Environmental Health Hazard Assessment (OEHHA). Specifically, in February 2015, OEHHA  
7 published its Guidance Manual for Preparation of Health Risk Assessments, which furnishes an  
8 inhalation cancer potency factor specific to EtO and the calculation approaches for looking at off-  
9 site worker exposure.

10 8. The data attached to the declaration of Angela Haar confirms the presence of elevated  
11 concentrations of EtO in ambient air surrounding Respondent's facilities in Vernon. Based on the  
12 measured concentrations and proximity to receptors for off-site workers, heightened cancer risks  
13 may exist for some community members and workers exposed to airborne EtO in this community.  
14 If the measured concentrations represent chronic exposures, EtO emissions from the Vernon  
15 facility pose a public health hazard. This assessment assumes that concentrations measured in the  
16 data would continue, if no actions are taken, over 25 years for workers. EtO cancer risks may have  
17 been similarly elevated or even substantially greater for the years the facility operated before the  
18 District started its community investigation, but historical risk cannot be evaluated with available  
19 emission data.

20 9. If measured data represents typical EtO concentrations in ambient air, an elevated cancer  
21 risk exists for off-site workers in the community surrounding the Respondent's operations in  
22 Vernon. These elevated risks present a public health hazard to this population, which can also be  
23 stated as the EtO emissions endangering the health or safety of the public if no actions are taken to  
24 reduce emissions. Based on this assessment, it is appropriate for Respondent to take all  
25 appropriate immediate, near-term, and long-term actions to reduce EtO emissions at the Vernon  
26 facilities, which I understand the stipulated order for abatement will help accomplish.

27 10. Of final note, the District's air monitoring data to date does not show that concentrations of  
28 EtO are elevated above background levels at houses and schools nearest to Respondent's facilities

1 in Vernon. Additionally, the measured EtO concentrations indicate that non-cancer health effects  
2 are unlikely for residents and off-site workers in the Vernon community surrounding the  
3 Sterigenics facilities. While both these points are important and reassuring, this does not put aside  
4 my opinion regarding endangerment closer to the facility and that Sterigenics should have to take  
5 required actions to reduce its EtO emissions and subsequent exposures in the community.

6 I declare under penalty of perjury under the laws of the State of California that the  
7 foregoing is true and correct.

8 Executed on August 3, 2022, at County of Orange, California.

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11 DR. NICHOLE QUICK  
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*Declaration of Crystal Villanueva*

1 **DECLARATION OF CRYSTAL VILLANUEVA**

2 1. I, Crystal Villanueva, declare:

3 2. I am employed as a Supervising Air Quality Inspector in the Compliance & Enforcement  
4 Division of the South Coast Air Quality Management District (District). Unless otherwise stated  
5 expressly below, I make this declaration based on personal knowledge and, if called as a witness in  
6 this action, could and would testify competently to the matters discussed herein.

7 3. I have served as an Air Quality Inspector at SCAQMD since 2008. I hold a Bachelor of  
8 Science from the University of California, Riverside. In my current position, I conduct air quality  
9 inspections.

10 4. As an inspector, I have visited operations of Respondent Sterigenics in Vernon and the  
11 surrounding vicinity. I am familiar with the buildings in Vernon designated as Facility ID Nos.  
12 126197 and 126191 with facility addresses 4900 S Gifford Ave. and 4801-63 E 50<sup>th</sup> Street,  
13 respectively, in Los Angeles, California 90058, and referred to as the Vernon Facilities in the  
14 Petition for Order for Abatement.

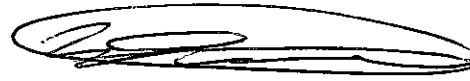
15 5. Specifically, I have to date been in the City of Vernon for the purpose of investigating  
16 Respondent's compliance with District rules three times. All the properties adjacent to or  
17 immediately neighboring Sterigenics' operations are industrial or commercial, with the nearest  
18 residential properties two blocks to the south.

19 6. The District has conducted ambient air monitoring and taken grab samples to characterize  
20 and quantify emissions of ethylene oxide (EtO) from Respondent's operations. One of the  
21 locations with highest readings of EtO is an immediately neighboring parking lot for the business  
22 Complete Clothing Co., located at 4950 E 49<sup>th</sup> St, which sits generally to the northeast of  
23 Respondent's operations, as marked in the attached aerial map. Certain workers for Complete  
24 Clothing Co. work outdoors in this parking lot in the course of the business day. Respondent's  
25 operations have exposed at least 5 off-site workers, and at most approximately 30-40 off-site  
26 workers, to elevated levels of EtO, in view of the District's ambient air monitoring results.

27 I declare under penalty of perjury under the laws of the State of California that the  
28 foregoing is true and correct.

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Executed this 3rd day of August 2022, at Diamond Bar, California.



Crystal Villanueva



Aerial Map - Complete Clothing Co.  
4950 E 49<sup>th</sup> St  
Vernon



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