

1 **HOGAN LOVELLS CADWALADER US LLP**

2 J. Tom Boer (State Bar No. 199563)

3 tom.boer@hlc.com

4 4 Embarcadero Center, Suite 3500

5 San Francisco, California 94111

6 Telephone: (415) 374-2300

7 Facsimile: (415) 374-2499

8 Attorneys for Petitioner

9 *STERIS, INC.*

10 **BEFORE THE HEARING BOARD OF THE SOUTH COAST AIR**
11 **QUALITY MANAGEMENT DISTRICT**

12 In the Matter of

13 STERIS, INC.,

14 Petitioner,

15 v.

16 SOUTH COAST AIR QUALITY
17 MANAGEMENT DISTRICT,

18 Respondent.

CASE NO. 6297-1

FACILITY ID NO. 120829

**DECLARATION OF JOHN WEST IN
SUPPORT OF STERIS, INC.'S
APPLICATION FOR A REGULAR
VARIANCE**

Date: October 20, 2026

Time: 9:30 AM

Location: 21865 Copley Drive
Diamond Bar, CA 91765

1 I, John West, declare:

2 1. I am a Senior Director of Engineering at STERIS Applied Sterilization Technologies
3 ("STERIS AST"). I have served in this position since October 2022.

4 2. Prior to assuming my current position, I served as Plant Manager at STERIS AST's
5 sterilization facility in South Carolina and as Operations Manager at a Becton, Dickinson and
6 Company manufacturing site. I have more than 30 years of experience in management and operations
7 roles with various companies.

8 3. I received Bachelor of Science in Chemical Engineering from Ohio University.

9 4. As Senior Director of Engineering at STERIS AST, my responsibilities include
10 overseeing employees that manage the engineering, maintenance, and capital improvements of the air
11 pollution controls at the facility located at 43425 Business Park Drive, Temecula, California (the
12 "Facility").

13 5. Through my position and responsibilities, I am familiar with the Facility's air pollution
14 control system, including the history of maintenance on the system, recent corrective measures, and
15 efforts being undertaken to upgrade components of the system.

16 6. I submit this declaration in support of the Facility's application for a regular variance
17 before the South Coast Air Quality Management District ("SCAQMD") Hearing Board. This
18 declaration describes the Facility's maintenance of its air pollution control system, its efforts to
19 investigate and remedy the catalytic oxidizer performance issue identified through source testing in
20 July 2026, the corrective measures implemented to date, the Facility's ongoing technical evaluation,
21 and the prospective compliance plan, including installation of additional air pollution control
22 equipment and the anticipated schedule for achieving compliance.

23 **Facility Maintenance of Air Pollution Control System**

24 7. The Facility utilizes a traditional three-step ethylene oxide ("EtO") sterilization process
25 that takes place in preconditioning rooms, sterilization vessels/chambers, and aeration rooms. In
26 addition, the Facility can perform "All-in-One" processing where preconditioning, sterilization, and
27 aeration are completed within the sterilization chamber itself.

1 8. Prior to the unexpected results of the July 30, 2026 source test, the Facility's routine
2 maintenance program was one element that supported operation of the catalytic oxidizer in a manner
3 that would achieve the required 99.99 percent EtO removal efficiency. The Facility utilizes an
4 electronic preventive maintenance system to schedule routine maintenance activities and track their
5 completion.

6 9. Routine maintenance of the air pollution control system at the Facility, including the
7 catalytic oxidizer, consists of both (i) annual preventive maintenance activities, which require the
8 Facility to temporarily suspend operations, and (ii) monthly preventive maintenance activities, which
9 can be performed while the equipment remains in service. Attached as Exhibit 1 is a table summarizing
10 the planned maintenance and inspection activities routinely performed on the Facility's air pollution
11 control equipment, including the catalytic oxidizer.

12 10. In addition to routine maintenance, the Facility conducts unplanned and non-recurring
13 maintenance activities as necessary. For example, in July 2025, the Facility completed upgrades to the
14 catalytic oxidizer, peak shaver, and associated control systems. The project focused on modernization
15 and reliability improvements and included the following activities:

- 16 i. Installation of an updated control system for the catalytic oxidizer and peak shaver
17 to address operational vulnerabilities and to satisfy current National Fire Protection
18 Association requirements for system control and monitoring. The project included
19 testing to verify the proper operation of all 135 alarms.
- 20 ii. A mechanical evaluation of the air pollution control system to identify and address
21 issues affecting catalytic oxidizer internals, pumps, fans, flanges, and joints,
22 including potential sources of noise, vibration, and leaks.
- 23 iii. Installation of new strainers within the peak shaver water recirculation loop to
24 improve the system's ability to control EtO concentrations entering the catalytic
25 oxidizer. The strainers were not a new feature of the peak shaver system. The
26 original peak shaver design included a Y-strainer located downstream of the
27 recirculation pumps. At some point, that configuration was replaced with basket-

1 type strainers. The July 2025 work involved replacement of portions of the peak
2 shaver recirculation piping and installation of new strainers, consistent with the
3 manufacturer's recommendations. The strainers replaced existing components that
4 performed a function incorporated into the original system design.

5 11. Pursuant to Rule 1405(m), the Facility also implements a leak detection and repair
6 ("LDAR") program. Under the LDAR program, the Facility conducts inspections of all applicable
7 areas and components every 60 calendar days to identify potential leaks and verify that EtO
8 concentrations are within acceptable bounds. The most recent LDAR inspection, conducted on August
9 24, 2026, confirmed that none of the inspected areas at the Facility had measurable EtO concentrations.
10 The work order and completed inspection work sheet from the August 24, 2026 LDAR inspection is
11 attached hereto as Exhibit 2.

12 **Technical Evaluation and Compliance Plan**

13 1. The Facility conducted a series of source tests of the catalytic oxidizer on July 30, 2026,
14 August 11, 2026, and on August 27 and 28, 2026, respectively.

15 2. Following receipt of the preliminary results from the third source test, indicating that
16 the 99.99 percent removal efficiency was still not achieved, the Facility initiated a comprehensive
17 technical evaluation of the catalytic oxidizer and associated systems to identify and implement
18 measures necessary to achieve compliance with the applicable performance requirements of Rule 1405
19 and the Facility's permit. This evaluation includes assessment of the heat exchanger; pressure,
20 temperature, and airflow across the catalyst bed; gasket integrity; leak and dye testing of associated
21 infrastructure; and evaluation of the peak shaver system, including capacity, automated flushing, and
22 potential installation of a chiller.

23 3. In parallel with this evaluation, the Facility has already purchased supplemental dry-
24 bed polishing equipment to be incorporated into the catalytic oxidizer exhaust system as an additional
25 stage of air pollution control. Engineering and design activities for the supplemental dry-bed system
26 occurred in September 2026. Installation of the equipment will require a permit modification from
27
28

1 SCAQMD. The Facility intends to submit the required permit modification application and proceed
2 with installation in accordance with applicable permitting requirements.

3 4. The Facility is also evaluating modifications to the catalytic oxidizer catalyst trays.
4 Additional catalyst trays have already been ordered and delivery is expected in November 2026. The
5 catalyst trays are replacement-in-kind components and do not represent a change to the design of the
6 catalytic oxidizer. The replacement trays will maintain the same function, configuration, and operating
7 purpose as the existing catalyst trays and will not change the design or method of operation of the
8 catalytic oxidizer. Accordingly, the replacement of the catalyst trays is considered replacement-in-
9 kind and is not anticipated to require a permit modification from the SCAQMD.

10 5. The Facility's ongoing technical evaluation may identify additional equipment
11 modifications, operational changes, or other corrective measures necessary to achieve and maintain
12 compliance.

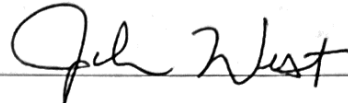
13 6. The Facility has requested a variance beginning October 20, 2026, and ending no later
14 than March 31, 2027. The proposed timeline for the variance period was developed to accommodate
15 the necessary work identified via an analysis of the four phases being pursued to achieve 99.99 percent
16 removal efficiency for the catalytic oxidizer:

- 17 i. Engineering and design;
- 18 ii. Procurement;
- 19 iii. Permitting and regulatory approvals; and
- 20 iv. Implementation and compliance verification.

21 7. Attached as Exhibit 3 is a Gantt chart depicting the anticipated project schedule based
22 on currently available information and reasonable estimates for each project phase.

23 8. The engineering and design phase is complete and work on the procurement phase has
24 begun, including the purchase of additional equipment as described above.

1
2 I declare under penalty of perjury under the laws of the State of California that the foregoing
3 is true and correct. Executed this 14th day of October, 2026 at Chillicothe, Ohio.
4

5 

6 John West
7 Senior Director of Engineering
8 STERIS AST
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit 1

Preventive Maintenance Work	Task(s) to be completed
2026 Annual Abator PM Work Order	Replacing belts, filters, UV scanner and greasing bearings
Monthly Abator PM	<p>Lubricate catalytic oxidizer blower bearings, inspect main blower for any unusual noises and signs of wear or vibration</p> <p>Inspect combustion blower for any unusual noises and signs of wear or vibration</p> <p>Record Dwyer Magnehelic Gauge (PDI111A) reading at the catalyst bed inlet</p> <p>Record Dwyer Magnehelic Gauge (PDI111B) reading at the catalyst bed outlet</p>
Semiannual PM Abator Thermocouple Probe Change Out	<p>Install the replacement thermocouple probe and record the probe number indicated on the tag</p> <p>Record the certification expiration date for the thermocouple probe</p>
Annual Peak Shaver PM	Grease motors, inspect spray head for proper alignment, visually inspect demister pad for any signs of excessive polymerized glycol buildup, inspect spark arrestors and clean if needed
Monthly Peak Shaver PM	<p>Inspect blower for any unusual noises and signs of wear or vibration</p> <p>Add 12 oz of de-foaming agent to peak shaver sump</p> <p>Record recirculation water gallons per minute reading</p> <p>Inspect recirculation pump for any unusual noises and signs of wear or vibration</p> <p>Inspect the recirculation PVC piping for leaks</p> <p>Record recirculation water pressure in PSI</p>

Exhibit 2



Safety Note: 'Perform Lockout Tagout as required and don proper PPE prior to performing task'

WO No.: 58650

WO Date: 08/23/2026

WO Time: 05:02:13

Project #:

Sched. Date: 08/23/2026

Est. Hours: 0.00

Asset ID: STERIS_TEMECULA

Asset Description: STERIS TEMECULA

Request #:

Requested By: P.M. Schedule

Assign To Type: Employee

Assign To: (STEVE CARLTON)

Open / History: H

Job Status: Closed

Task Type:

WO Type: PM

Problem Type:

Completed Date: 08/24/2026

Closed Date: 08/25/2026

Downtime: 0.00

Site: TM 116

Department:

Priority:

Perform For Type: Employee

Perform For:

Task No.:

Brief Description: Rule 1405 60 Day Checklist For Ethylene Oxide Leaks

Insp. Round WO#:

Safety Note: 'Perform Lockout Tagout as required and don proper PPE prior to performing task'

Work Description: Using The MiniRae 3000 11.7eV Lamp/AuraRaw 2 Handheld Detector, Monitor The Locations Indicated On The Attached Map. Record Readings On The Attached Work Permit. Notify The Maintenance Manager Immediately If Any Reading Exceeds 2 PPM

Technician Comment: ALL TEST LOCATIONS TESTED AND WORK PERMIT COMPLETED
MMONTES 8-24-26

Weblink:

Change Control Required?: False

Work Order Charges

	Tranid	Category	Wo	Contactid	Trandate	Qty	Unitcost	Excost	Comment	Start time	Stop time
Employee											
	_7JM10YVPZ	Employee	58,650	MMONTES - MARCOS MONTES	08/24/2026	1.45	0.00	0.00			
	_7JM111P83	Employee	58,650	MMONTES - MARCOS MONTES	08/24/2026	0.95	0.00	0.00		08/24/2026 01:20:00 PM	08/24/2026 02:17:05 PM
Sub						2.40		0.00			
Total						2.40		0.00			

Work Permits

Unique ID	WO No.	Permit Type	Comments	Permit Description	RAD PDF Id	Required?	Completed?	Completed Document
_7JL0H88X0	58650	1405 Leak Test Form (60) Day		1405 Leak Test Form (60) Day	437,177	☒	☒	60 Day Leak Test Form 58650 7JM10UVAD.pdf 60 Day Leak Test Form 58650 7JM10UVAD.pdf

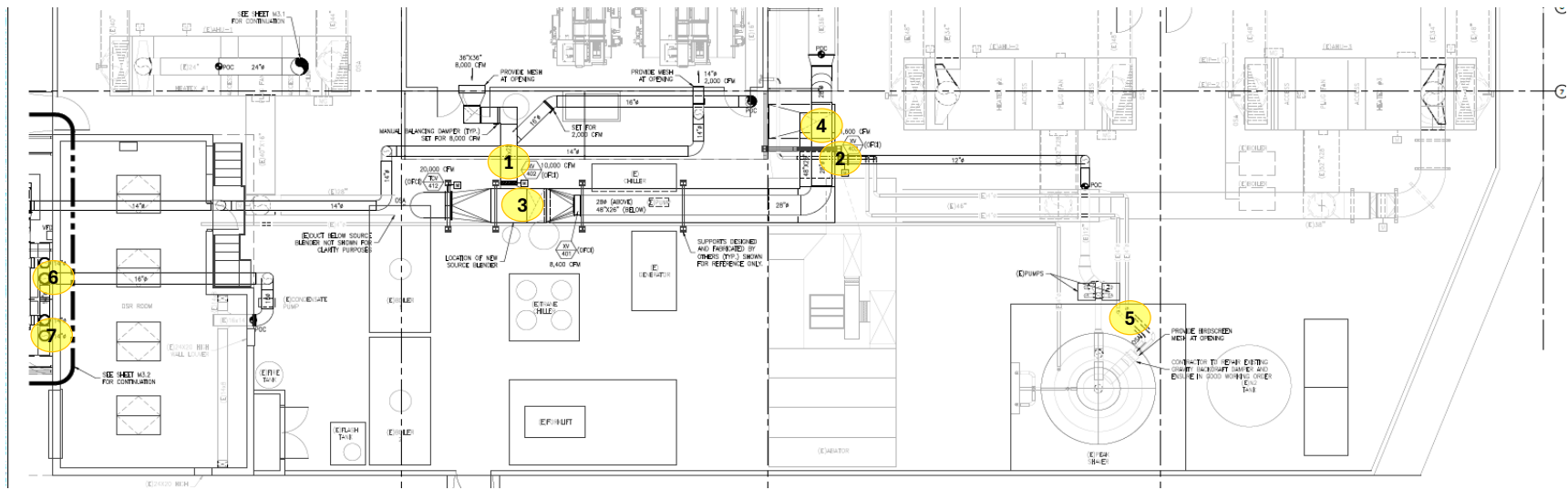
Work Permits

Unique ID	WO No.	Permit Type	Comments	Permit Description	RAD PDF Id	Required?	Completed?	Completed Document
_7JL0H88X0	58650	1405 Leak Test Form (60) Day		1405 Leak Test Form (60) Day	437,177	☒	☒	60 Day Leak Test Form 58650 7JM10UVAD.pdf 60 Day Leak Test Form 58650 7JM10UVAD.pdf

Audit Trail

Date / Time (EST)	User ID	Field Name	Old Value (c)	New Value (c)
08/24/2026 02:12:18 PM	MMONTES	DCOMPLETED	//	08/24/2026
08/24/2026 02:12:18 PM	MMONTES	STATTYPE	Open	Completed
08/24/2026 02:14:36 PM	MMONTES	COMMENTS		ALL TEST LOCATIONS TESTED AND WORK PERMIT COMPLETED MMONTES 8-24-26
08/25/2026 07:16:11 AM	STEVENCA95	STATTYPE	Completed	Closed
08/25/2026 07:16:11 AM	STEVENCA95	WORKSTATUS	O	H
08/25/2026 07:16:12 AM	STEVENCA95	WORKSTATUS	O	H
08/25/2026 07:16:12 AM	STEVENCA95	EDITUSER	MMONTES	STEVENCA95
08/25/2026 07:16:12 AM	STEVENCA95	EDITDATE	08/24/2026	08/25/2026
08/25/2026 07:16:12 AM	STEVENCA95	EDITTIME	14:14:36	07:16:11
08/25/2026 07:16:12 AM	STEVENCA95	STATTYPE	Completed	Closed

08/25/2026 07:16:12 AM	STEVENCA95	CLSDBY		STEVENCA95
08/25/2026 07:16:12 AM	STEVENCA95	DCLOSED	//	08/25/2026



Temecula, CA Rule 1405 Leak Detection Monitoring

Conducted By:	Marcos Montes	Monitoring Date:	8-24-2026
Location #	Area to check for Ethylene Oxide Leaks	PID Reading (PPM) If leak detected greater than 2 ppm, notify Maintenance Manager for proper notification to SCAQMD within 24 hours.	
1	Outlet connection from the Chamber Room at the source blender inlet connection.	0.0	
2	Outlet Connection from the Peak Shaver at the source blender inlet connection.	0.0	
3	Outlet connection from the Aeration Room at the source blender inlet connection.	0.0	
4	Outlet Connection from the source blender to the Abator inlet connection	0.0	
5	Outlet connection from Chamber Room vacuum pumps at the Peak Shaver inlet connection.	0.0	
6	Inlet Connection to drum room AAT-1	0.0	
7	Inlet Connection to drum room AAT-2	0.0	

Work Order #

58650

Exhibit 3

Critical Activities for Temecula, CA STERIS Facility – Variance Compliance Plan								
Activity	Description / Dependency	Sep 2026	Oct 2026	Nov 2026	Dec 2026	Jan 2027	Feb 2027	Mar 2027
ENGINEERING / DESIGN								
Complete catalytic oxidizer & associated systems technical evaluation	Evaluation supporting final corrective measures and design basis.							
Develop AAT dry bed control system design	Advance design to a level sufficient to support permitting; detailed design may continue thereafter.							
Evaluate and develop peak shaver modifications	Define selected modifications through engineering evaluation.							
Complete design of selected peak shaver modifications	Complete design sufficient to support permitting and implementation.							
PROCUREMENT								
Order long-lead equipment	Advance procurement in parallel where permissible.							
Order new catalyst trays	Procure catalyst trays identified by engineering.							
Complete remaining equipment procurement	Procure remaining equipment after design requirements are sufficiently defined.							
PERMITTING / APPROVALS								
Prepare SCAQMD permit modification application(s)	Prepare after design basis is sufficiently developed; preparation may overlap late-stage design.							
Submit SCAQMD permit modification application(s)	Target submittal following development of sufficient design information.							
SCAQMD permit review / approval*	Agency-dependent review period; timing is not controlled by the facility.							
Obtain other required construction permits / approvals*	As applicable; schedule dependent on external review.							
IMPLEMENTATION / COMPLIANCE								
Complete authorized pre-shutdown work	Advance work that may proceed before final shutdown and installation, subject to required approvals.							
Install permitted equipment and modifications*	Installation to proceed after receipt of required regulatory/construction approvals.							
Execute planned shutdown and commission equipment*	Final installation tie-ins, startup, and commissioning.							
Conduct compliance source testing*	Conduct testing following installation and commissioning to demonstrate compliance.							

Legend: Blue = facility-controlled activity / target timing; Gray = agency or external dependency.

* Schedule reflects the facility's current anticipated timeline based on information available as of September 2026. Certain activities and completion dates are dependent upon the results of ongoing engineering evaluations, equipment availability, and receipt of applicable South Coast AQMD and other regulatory or construction approvals. SCAQMD review and approval timing is outside the facility's control. The facility will continue to advance activities within its control as expeditiously as practicable. Installation of equipment or modifications requiring approval will proceed only after receipt of the applicable authorization.