

2V

**PETITION FOR VARIANCE
BEFORE THE HEARING BOARD OF THE SOUTH COAST AQMD
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

SOUTH COAST AQMD
CLERK OF THE BOARD
2026 SEP 11 P 4:01

PETITIONER: STERIS, Inc.

CASE NO: 6297-1

FACILITY ID: 120829

FACILITY ADDRESS: 43425 Business Park Drive

[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: Temecula, CA 92590

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

☐ INTERIM ☐ SHORT ☒ REGULAR ☐ EMERGENCY ☐ EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

J. Tom Boer, Esq.

Eva Mejia

Hogan Lovells Cadwalader US LLP

Plant Manager, Applied Sterilization Technologies

4 Embarcadero Center, Suite 3500

43425 Business Park Drive

San Francisco, CA Zip 94111

Temecula, CA Zip 92590

☎ (415) 374-2336 Ext.

☎ (951) 694-9340 Ext.

Fax ()

Fax ()

E-mail tom.boer@hlc.com

E-mail Eva_Mejia@steris.com

3. RECLAIM Permit ☐ Yes ☒ No Title V Permit ☐ Yes ☒ No

Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov.

If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

Not applicable – this petition does not seek an Emergency or Interim Variance. Rather, the petition seeks a regular variance with sufficient time for required public notice.

5. Briefly describe the type of business and processes at your facility.

The facility relevant to this variance petition is located at 43425 Business Park Drive in Temecula California (the "Facility") and operates as a contract sterilization provider.

Under contract with its customers, the Facility provides ethylene oxide ("EtO") sterilization services for critical healthcare products. Approximately 110 medical device manufacturers rely upon the Facility for sterilization services related to a broad range of products utilized in patient diagnosis, treatment, disease management, and surgical intervention. Products sterilized at the Facility, for example, include devices used in cardiovascular and structural heart procedures, orthopedic and trauma reconstruction, minimally invasive and robotic surgery, electrophysiology and cardiac mapping, ophthalmology, vascular access, airway management, surgical instrumentation, and single-use procedural kits. The demand for sterilization services needed to ensure an uninterrupted supply of sterilized medical devices to the healthcare market is very high and, as a result, the Facility operates twenty-four hours a day, seven days a week.

EtO sterilization remains an essential sterilization modality within the medical device industry due to its ability to effectively sterilize products with complex geometries, sensitive materials, and packaged configurations that may not be compatible with alternative sterilization methods. Estimates by the medical device industry indicate that approximately 50 percent of all single-use medical devices requiring sterilization are processed using EtO. This includes many life-sustaining and life-saving medical devices that are designed, tested, validated, and commercialized using EtO sterilization as an integral component of their manufacturing process. Consequently, continued access to qualified EtO sterilization capacity is critical to the medical device supply chain and healthcare delivery system. In addition to commercial sterilization processing, the Facility also supports customers throughout the product lifecycle by performing validation studies, engineering (R&D) runs, process development activities, and requalification work necessary for product commercialization and to maintain regulatory compliance. These services are often required to introduce new medical devices into the marketplace and to maintain existing product approvals. Interruption in the availability of EtO sterilization by the Facility, therefore, could delay product launches, disrupt manufacturing schedules, and adversely affect product availability to patients.

There are a limited number of medical sterilization facilities servicing Southern California. Building a facility requires substantial regulatory oversight and approvals, including by the U.S. Food and Drug Administration. As a result, the service provided by the Facility cannot be supplemented within the timeframe requested for this variance. Further, approximately 75 percent of the Facility's customers are validated by the Food & Drug Administration exclusively for sterilization services performed at the Facility. As a result, many customers do not have a qualified alternative sterilization provider readily available. Even if an alternative provider were identified, validating that provider for regulated products typically requires several months to a year. Consequently, due to limited alternatives for sterilization services and regulatory requirements, the Facility's customers are unlikely to be able to transition to alternative sterilization services within the timeframe requested for this variance.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Catalytic Oxidizer, Donaldson, Model 20000 SCFM	A/N 664738 Facility ID 120829	N/A	N/A

*Attach copy of denial letter

Exhibit 1 to this Variance Petition is a copy of Permit to Construct, A/N 664738, for Facility ID 120829 (Granted as of 2/4/2026)

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

The Facility cannot perform EtO sterilization operations without its catalytic oxidizer. This is because the catalytic oxidizer is an integral component of the Facility's air pollution control system required to treat EtO-containing exhaust streams from the sterilization chambers and associated process areas.

Operation of the catalytic oxidizer is mandated by the Facility's South Coast AQMD permit and the applicable requirements of Rule 1405. Specifically, Permit Condition 5 requires that the air pollution control system be "in full use whenever drums containing EtO are stored in the drum room and whenever the sterilization chambers and/or aeration rooms are in operation."

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes ☒ No ☐

If yes, how often: See below Date of last maintenance and/or inspection See below

Describe the maintenance and/or inspection that was performed.

Prior to the unexpected results from the July 30, 2026 source testing, the Facility's regular maintenance activities contributed to the catalytic oxidizer operating in a manner that achieved the required removal efficiency of 99.99%.

The Facility uses an electronic preventive maintenance system to schedule regular maintenance tasks and track the completion of maintenance activities. Regular maintenance of the air pollution control system (including the catalytic oxidizer) is a combination of (i) annual preventive maintenance, which requires the Facility to shut down, and (ii) monthly preventive maintenance, which can be performed while the equipment is operating.

Exhibit 2 to this Variance Petition is a table that illustrates the scope of planned, regular maintenance and inspection activities for the Facility's pollution control equipment (including the catalytic oxidizer).

The Facility also conducts unplanned and non-recurring maintenance activities on an as-needed basis. For example, in July 2025, the Facility conducted upgrades on the catalytic oxidizer, peak shaver, and the control system. The project focused on modernization and reliability upgrades, including the following tasks:

1. Installation of an updated control system for the catalytic oxidizer and peak shaver to address operational vulnerabilities with older/original controls and to meet modern National Fire Protection Association safety requirements for control and monitoring. This included testing to verify proper operation of all 135 alarms.
2. Mechanical evaluation performed on the pollution control system to address any issues with catalytic oxidizer internals, pumps, fans, flanges, and joints for noise, vibration, and leaks.
3. Addition of strainers to the peak shaver water loop to increase its ability to control EtO levels sent to the catalytic oxidizer.

9. List all South Coast AQMD rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
Rule 1405(d)(1)(C) [A/N 664738 Condition No. 9A]	The Facility has been unable to demonstrate the required control efficiency of 99.99% for the catalytic oxidizer, or concentrations at or below 0.01 parts per million, by volume at stack conditions, via the most recent source tests.
Rule 1405(d)(1)(E)(iii) [A/N 664738 Condition No. 9]	The Facility has not successfully completed a source test demonstrating the required control efficiency of 99.99% for the catalytic oxidizer within twelve (12) months after the date of the prior successful source test.
A/N 664738 Condition No. 4	The Facility cannot operate in compliance with all applicable requirements of Rule 1405, i.e., the requirements specified in Rule 1405(d)(1)(C) and Rule 1405(d)(1)(E)(iii).
Rule 202(a)	The permit to construct shall serve as a temporary permit for operation of the equipment until the permit to operate is granted or denied. The equipment shall not be operated contrary to the conditions specified in the permit to construct.

10. Are the equipment or activities subject to this request currently under variance coverage? Yes ☐ No ☒

Case No.	Date of Action	Final Compliance Date	Explanation

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes ☐ No ☒

Case No.	Date of Action	Final Compliance Date	Explanation

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes ☒ No ☐

If yes, you must attach a copy of each notice.

Exhibit 3 to this Variance Petition is a copy of Notice to Comply E58618 and Notice to Comply E62358.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes ☐ No ☒

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

Prior to identifying that the catalytic oxidizer was operating with a removal efficiency below the 99.99% standard, the Facility diligently conducted ongoing maintenance of the pollution control system as discussed in response to Question No. 8. The catalytic oxidizer had also successfully demonstrated compliance with the 99.99% removal efficiency requirement during the prior source test conducted in August 2025. There were no new conditions or operational changes at the Facility indicating that the catalytic oxidizer would be unable to demonstrate the required performance during subsequent testing in 2026.

On July 30, 2026, the Facility conducted a source test of the catalytic oxidizer (approximately two weeks in advance of the deadline specified by Rule 1405). The preliminary test results indicated that the unit did not meet the applicable performance requirement of 99.99% removal efficiency. Given the successful August 2025 source test and the absence of known operational conditions indicating a performance deficiency, the July 30 results were unexpected. Nonetheless, in response the Facility promptly initiated an evaluation and took corrective action that was anticipated, based on the information available at the time, to remedy the condition. Additional catalyst was installed, and the catalytic oxidizer was subsequently retested on August 11, 2026.

When the August 11 source test failed to demonstrate compliance with the 99.99% removal efficiency requirement, the Facility promptly undertook more extensive corrective action. This included replacing the catalyst in its entirety. A third source test was conducted on August 28, 2026. Despite these actions, the August 28 source test again did not demonstrate the required performance of 99.99% removal efficiency.

The Facility has acted diligently and in good faith by instituting corrective action and promptly conducting additional source tests. Following each failed test, the Facility evaluated the information available, implemented corrective measures reasonably anticipated to remedy the performance issue, and conducted subsequent testing to evaluate the effectiveness of those measures. The persistence of the performance issue despite these multiple efforts, including complete replacement of the catalyst, demonstrates that further technical evaluation is necessary to resolve the underlying cause or causes affecting catalytic oxidizer performance and ensure that long-term operations will be in conformance with Rule 1405 and applicable Permit conditions.

The Facility is continuing that technical evaluation and has already taken additional affirmative measures, including ordering additional air pollution control equipment to supplement the existing control system. This additional equipment goes beyond the air pollution control equipment required pursuant to the Facility's existing permit and reflects the Facility's commitment to implementing an effective and sustainable compliance solution.

Accordingly, the circumstances were beyond the Facility's reasonable control because: (i) the catalytic oxidizer had previously demonstrated compliance via a 2025 source test, (ii) routine maintenance was performed on the catalytic oxidizer during the year following the 2025 source test, (iii) no new conditions or operational changes at the Facility indicated that the catalytic oxidizer might fail the 2026 source test, (iv) the Facility could not have reasonably anticipated the performance issue based on information available prior to the July 30, 2026, source test, and (v) upon identifying the compliance issue, the Facility promptly communicated with Air District staff, undertook successive corrective actions that were reasonably anticipated to remedy the condition, and conducted two additional source tests of the catalytic oxidizer.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

Following the July 30, 2026, source test, the Facility became aware of a performance issue with the catalytic oxidizer. The Facility conducted a controlled shutdown on August 2, 2026, to investigate the issue and implemented corrective actions reasonably anticipated to remedy the condition.

Following implementation of the corrective actions, a second source test was conducted on August 11, 2026. The results demonstrated that the corrective action had not resolved the performance issue. At that time, the Facility became aware that the difficulty in achieving the required 99.99% removal efficiency for the catalytic oxidizer persisted and that additional corrective actions would be necessary to ensure long-term compliance.

It is notable, however, that the preliminary source test results indicate that the catalytic oxidizer is operating at a 99.92% removal efficiency and that the facility-wide mass emission rate, specified by Permit Condition 9(B)(i) and Rule 1405(d)(1)(D)(i), continues to be met as further discussed in response to Questions 20 and 21.

16. List date(s) and action(s) you have taken since that time to achieve compliance. That the Petition Form HB-V, and any related instructions, include requirement that the Petitioner include a timeline in suitable, chronological format to address the events, dates, and actions called for by Questions 15 and 16, including the dates of communication with the South Coast AQMD to notify them of the occurrence(s) giving rise to the requested variance.

The following chronology summarizes the identification of the issue with the removal efficiency of the catalytic oxidizer and the actions undertaken by the Facility in response, including efforts to expeditiously achieve compliance and communicate with staff at the South Coast AQMD:

July 30–31, 2026: The Facility was required to perform a source test by mid-August. A source test for the catalytic oxidizer was scheduled to proceed approximately two weeks in advance of that deadline. Preliminary test results indicated that the removal efficiency for the catalytic oxidizer was below the required 99.99% standard. As a result, the test results did not demonstrate the performance required by Rule 1405 or the Facility's Permit. The Facility notified South Coast AQMD on July 31, 2026 (Notification No. 898895). The Facility promptly initiated an investigation and corrective actions, including a system shutdown, catalyst top-off, peak shaver water cleanup, and catalyst sample evaluation.

August 2–6, 2026: The Facility conducted a controlled shutdown to investigate the catalytic oxidizer performance issue and complete corrective actions.

August 6, 2026: The Facility communicated with South Coast AQMD staff (Peter Homsey) regarding the operational status of the Facility and catalytic oxidizer. Facility operations resumed following completion of the initial investigation and corrective actions.

August 7, 2026: The Facility communicated with South Coast AQMD staff regarding a schedule change for a second catalytic oxidizer source test.

August 11–12, 2026: The Facility conducted a second source test of the catalytic oxidizer on August 11, 2026. The preliminary results indicated that the initial corrective actions had not resolved the performance issue because the catalytic oxidizer continued to operate below 99.99% removal efficiency. The Facility notified South Coast AQMD staff of the results on August 12, 2026 (Notification No. 900515). The Facility proceeded with additional corrective actions, including procurement of 27 barrels of replacement catalyst for a complete catalyst replacement and additional peak shaver water cleanup.

August 16–21, 2026: The Facility conducted another controlled shutdown to implement the additional corrective actions, including complete replacement of the catalyst. Facility operations resumed on August 21, 2026.

August 27–28, 2026: The Facility conducted a third source test of the catalytic oxidizer following the complete catalyst replacement. The preliminary test results continued to indicate that the corrective actions had not resolved the performance issue because the catalytic oxidizer continued to operate below 99.99% removal efficiency. The Facility notified South Coast AQMD staff on August 28, 2026.

Following the August 28, 2026 Source Test: The Facility continued its technical evaluation and initiated the purchase of additional dry-bed polishing equipment to supplement the existing catalytic oxidizer control system.

September 1, 2026: The Facility communicated with South Coast AQMD staff (Peter Homsey) regarding the catalytic oxidizer performance issue and processing reductions associated with ongoing corrective action efforts.

September 2, 2026: The Facility communicated with South Coast AQMD staff (Dana Maxie) about corrective action efforts and the intention to pursue a variance.

September 3, 2026: Tom Boer, outside counsel for STERIS, spoke by phone with Mary Reichert, Senior Deputy District Counsel, about the compliance status of the Facility, ongoing corrective action efforts, and the anticipated need for a variance.

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses: \$ Approximately \$1.6 million/month

Number of employees laid off (if any): Up to 30, depending on duration of shut down

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

If the Facility were required to shut down, the Company would lose approximately \$1.6 million per month of revenue.

The Facility has approximately 30 employees across operations, quality assurance, maintenance, validation services, customer support, and administrative functions. These employees possess specialized knowledge and experience related to sterilization operations, quality systems, regulatory compliance, validation activities, and customer-specific processing requirements. Prolonged interruption in operations could adversely affect workforce stability, employee retention, and the preservation of specialized technical expertise developed through years of operational experience. Loss of this expertise could affect the Facility's operational readiness and its ability to continue supporting Customer requirements.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

It is not feasible to curtail or terminate operations as an alternative to obtaining a variance. As discussed in response to Question No. 5, the Facility provides the medical industry with critical sterilization services. The demand for these services is substantial, generally requiring the Facility to operate 24 hours a day, seven days a week. Many of the Facility's customers do not have an alternative contract sterilization provider that has been validated by the Food & Drug Administration to sterilize their products. As a result, these customers may be unable to maintain production if sterilization services at the Facility become unavailable, given that validating an alternative sterilization provider can take several months to a year. As such, any shut-down of the Facility, or material curtailment of operations, would likely have a material impact on the healthcare industry in Southern California.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
N/A			

* Column A minus Column B = Column C

Excess Opacity: N/A %

20. Show calculations used to estimate quantities in No. 19, or explain why there will be no excess emissions.

Preliminary results from the three recent source tests of the catalytic oxidizer and dry bed scrubbers, conducted under normal operating conditions in July and August, demonstrated that emissions were only 56 percent of the Rule 1405 pounds per hour emission limit (i.e., preliminary results show an average emission rate of 0.0083 pounds per hour of EtO as measured against a limit of 0.015 pounds per hour specified by Rule 1405 and permit conditions). As such, the Facility does not anticipate excess emissions, beyond the facility-wide mass emission rate specified by Permit Condition 9(B)(i) and Rule 1405(d)(1)(D)(i) during the variance period.

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

Preliminary results from the three recent source tests, conducted under normal operating conditions in July and August, confirmed that the facility-wide mass emission rate was below 0.015 pounds of EtO per hour (lbs/hr) in compliance with Permit Condition 9(B)(i) and Rule 1405(d)(1)(D)(i) requirements. Although the preliminary results indicated that the removal efficiency of the catalytic oxidizer was below the required 99.99%, the catalytic oxidizer was still operating with a removal efficiency of approximately 99.92%. Therefore, the Facility does not anticipate any excess emissions – above the mandated facility-wide mass emission rate – during the variance period. As such, the Facility has not identified a need to further reduce emissions during the variance period.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

The Facility is required to conduct monthly mobile monitoring for EtO pursuant to Rule 1405(d)(7). More than thirty (30) monthly monitoring events, conducted between February 2024 and August 2026, have identified no EtO concentrations at levels triggering a requirement for grab sample collection. The most recent monthly mobile monitoring, conducted on August 28, 2026, had an average concentration of EtO of 1.06 ppb with a standard deviation of 0.85 ppb.

The Facility will continue to conduct monthly mobile monitoring in compliance with Rule 1405(d)(7). If deemed necessary to demonstrate that EtO emissions are not elevated beyond the Facility's property boundary, the Facility is prepared to discuss conducting an additional one or two rounds of mobile monitoring, during the variance period, with Air District staff.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

The Facility has initiated a comprehensive technical evaluation of the catalytic oxidizer and associated systems to identify and implement necessary measures to achieve compliance with applicable performance requirements specified in Rule 1405 and the Permit. This evaluation includes assessment of the heat exchanger; pressure, temperature, and airflow across the catalyst bed; gasket condition; leak and dye testing of associated infrastructure; and evaluation of the peak shaver system, including capacity, automated flushing, and potential chiller installation.

In parallel with this evaluation, the Facility has already purchased supplemental dry-bed polishing equipment to be incorporated into the catalytic oxidizer exhaust system as an additional stage of air pollution control. Engineering design for the supplemental dry-bed system is anticipated to occur during September 2026. Installation will require a permit modification from South Coast AQMD. The Facility will submit the required permit modification application and will proceed with installation in accordance with applicable South Coast AQMD permitting requirements.

In addition, the Facility is evaluating modifications to the catalytic oxidizer catalyst trays. Additional abatement trays have already been ordered, with filling and installation anticipated during November 2026.

The ongoing technical evaluation may identify additional equipment modifications, operational changes, or other corrective measures.

24. State the date you are requesting the variance to begin: October 20, 2026; and the date by which you expect to achieve final compliance: No later than March 31, 2027.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See South Coast AQMD Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:

The Facility has identified four project phases necessary for the catalytic oxidizer to achieve the required 99.99% removal efficiency: (i) Engineering / Design, (ii) Procurement, (iii) Permitting / Approvals (for the additional pollution control equipment to be installed at the Facility), and (iv) Implementation / Compliance. Work has already begun, including on the engineering / design work and procurement, as noted in response to Question 23, with the ordering of some required equipment. Exhibit 4 to this Variance Petition is a Gantt Chart identifying the anticipated project schedule based upon current available information and reasonable estimates for the required phases. Because the variance is not requested to extend beyond one year, a Schedule of Increments of Progress is not included.

25. List the names of any South Coast AQMD personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

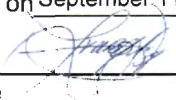
Mary Reichert – Senior Deputy District Counsel, Ext. 2575; Peter Homsey - Air Quality Inspector, Compliance and Enforcement, Ext. 3084; Dana Maxie - Sr Air Quality Engineer, Source Test Engineering, Ext. 2274; Colin Eckerle - Sr Air Quality Engineer, Source Test Engineering, Ext. 2476; Bill Welch - Manager, Source Test Engineering Monitoring & Analysis Division, Ext. 2243

26. If the petition was completed by someone other than the petitioner, please provide their name and title below.
The Petition was prepared by the Company, including Earl Marcum, Senior Environmental Compliance Manager and Sara Lupfer, Environmental Compliance Manager, with the assistance of outside counsel (J. Tom Boer, Partner at Hogan Lovells Cadwalader US LLP).

The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on September 11, 2026, at Temecula, California

Signature


Eva Mejia

Print Name

Title: Plant Manager

THIS SECTION IS FOR SMALL BUSINESSES ONLY

27. **SMALL BUSINESS ELIGIBILITY and TABLE III SCHEDULE A FEES:** To be eligible for reduced fees for small businesses, individuals, or entities meeting small business gross receipts criterion [see District Rule 303(h)], you must complete the following:

Declaration For Reduced Fee Eligibility

1. The petitioner is
a) ☐ an individual, or
b) ☐ an officer, partner or owner of the petitioner herein, or a duly authorized agent of the petitioner authorized to make the representations set forth herein.

If you selected 1a, above, skip item 2.

2. The petitioner is
a) ☐ a business that meets the following definition of Small Business as set forth in District Rule 102:

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

PAGE 10 OF 12

SMALL BUSINESS means a business which is independently owned and operated and meets the following criteria, or if affiliated with another concern, the combined activities of both concerns shall meet these criteria:

- (a) the number of employees is 10 or less; **AND**
- (b) the total gross annual receipts are \$500,000 or less **or**
- (iii) the facility is a not-for-profit training center.

-OR-

- b) ☐ an entity with total gross annual receipts of \$500,000 or less.

3. Therefore, I believe the petitioner qualifies for reduced fees for purpose of filing fees and excess emission fee calculations, in accordance with Rule 303(h).

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

Executed on _____, at _____, California

Signature _____

Print Name _____

Title _____

ATTACHMENT A

ITEM 1

Type of Variance Requested:

- (a) **SHORT:** If compliance with South Coast AQMD rule(s) can be achieved in **90 days or less**, request a short variance. *(Hearing will be held approximately 21 days from date of filing--10-day posted notice required.)*
- (b) **REGULAR:** If compliance with South Coast AQMD rule(s) will take **more than 90 days**, request a regular variance. If the variance request will extend beyond one year, you **must** include a specific detailed schedule of increments of progress [see Page 8, No. 24] under which you will achieve final compliance. *(Hearing will be held approximately 45 days from date of filing--30-day published notice required.)*
- (c) **EMERGENCY:** If non-compliance is the result of an unforeseen emergency, such as a sudden equipment breakdown, power failure, or accidental fire, you may request an emergency variance. You may request an *ex parte* emergency variance in addition to an emergency variance. **An emergency variance cannot be granted for more than 30 days.** *(Hearing will be held within 2 working days from the date of filing, whenever possible, excluding Mondays, weekends, and holidays.) If you request an emergency variance, you must answer No. 4 on page 1.*
- (d) **EX PARTE EMERGENCY:** If variance coverage is required on a weekend or when the Board is not in session, and you cannot wait until an emergency variance hearing can be held, you may request an *ex parte* emergency variance. An *ex parte* emergency variance will be granted or denied solely on the information contained in the petition and the South Coast AQMD's response to the petition. Under most circumstances, an *ex parte* emergency variance will remain in effect only until a hearing can be held. **If you request an *ex parte* variance, you must answer No. 4 on page 1.**
- (e) **INTERIM:** If you require immediate relief (other than for emergencies) to cover the time until a short or regular variance hearing can be held, request an interim variance. If you request an interim variance, you must also request a short or a regular variance on the same petition. *(Hearing will be held approximately 2 working days from date of filing, whenever possible, excluding Mondays, weekends and holidays.) If you request an interim variance, you must answer No. 4 on page 1.*

ITEM 4

GOOD CAUSE: The Hearing Board is required to provide public notice of variance hearings, as the public has a right to attend and testify at such hearings. In order for the Hearing Board to hold an Interim, *Ex Parte* Emergency or Emergency Variance hearing without the required public notice, a petitioner must present facts which will support a determination by the Board that "good cause" exists to hear a variance without notifying the public about the variance and providing the public with an opportunity to present evidence concerning the variance.

ITEM 6**Example #1:**

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Tenter frame		D32	
Chrome-plating tank	M99999		
Bake oven	123456		
Create special effects (fog)	N/A	N/A	N/A
Mfg., sale, distribution, use of non-compliant coating	N/A	N/A	12/10/95

ITEM 9

a) If you are requesting relief from Rule 401 and the excess opacity during the variance period will reach or exceed 40%, you should also request relief from California Health and Safety Code Section 41701.

b) If you are requesting relief from a permit condition(s), you should also request relief from the rule requiring compliance with conditions of the permit: 202(a), (b) or (c) - Temporary Permit to Operate; 203(b) - Permit to Operate; 2004(f)(1) – RECLAIM Permit; 3002(c) – Title V Permit.

Example #2:

Rule	Explanation
404(a)	tenter frame is vented to damaged air pollution control equipment
2004 (f)(1) [Condition No. 28-2 of Facility P/O No. 099999]	source test cannot be conducted as required until new ESP is installed
1113(c)(2)	petitioner manufactures and sells clear wood finishes with VOCs in excess of 350 grams per liter
401(a) & California H&S Code Section 41701	Opacity will exceed 45%.

ITEM 24**Example #3:****Sample Schedule of Increments of Progress**

- Permit application(s) will be submitted to the South Coast AQMD by [date].
- Contracts for the purchase of emission control systems will be awarded by [date].
- On-site construction will be completed by [date].

English	<i>“If you require a language interpreter in order to participate in the hearing, contact the Clerk of the Board at least five (5) calendar days before your hearing at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov . Specify the case name and number, hearing date, and the language for which you are requesting an interpreter.”</i>
Farsi	“اگر برای شرکت در جلسه استماع به مترجم نیاز دارید، حد اقل پنج (5) روز تقویمی قبل از جلسه استماع، با منشی هیئت توسط شماره تلفن 909-396-2500 یا بوسیله نامه الکترونیکی با نشانی clerkofboard@aqmd.gov تماس بگیرید. نام پرونده و شماره آن، تاریخ جلسه استماع و زبانی را که برای آن مترجم درخواست کرده اید، مشخص کنید.”
Arabic	“إذا كنت في حاجة لمترجم من أجل المشاركة في جلسة الاستماع، اتصل بكتّاب المحكمة قبل موعد جلسة الاستماع بخمسة (5) أيام على هاتف 2500-396-909 . حدد اسم ورقم القضية و تاريخ الاستماع واللغة التي تريد في clerkofboard@aqmd.gov 909-396-909 أو بالبريد الإلكتروني على مترجم لها.”
Armenian	“Դեկլարացիան մասնակցելու համար, եթե թարգմանչի կարիքն ունենաք, ցանքսան ձեր ռեկվիզիտացիոն, ասեմաքիչն հիմզ (5) օրացույցային օրից առաջ կապվեք համաձայնիքի բարոտաչափի հետ, 909-396-2500 հեռախոսահամարով կամ էլեկտրոնային ցանախով clerkofboard@aqmd.gov : Նշեք զարթի անունը և համարը, ռեկվիզիտացիոն թվականը, և լեզուն, որի համար թարգմանչի էք խանդավարում”
Vietnamese	“Nếu quý vị cần Thông Dịch Viên cho buổi điều trần, xin vui lòng điện-thoại cho Thư Ký Hội Đồng tại số 909-396-2500 trễ nhất là năm [5] ngày, không tính hai ngày Thứ Bảy và Chủ Nhật, trước buổi điều trần hoặc gửi điện thư đến clerkofboard@aqmd.gov . Nhớ ghi rõ tên và số hồ sơ, ngày điều trần, và ngôn ngữ quý vị cần có người để thông dịch.”
Chinese	如果你要求翻譯來協助你參加聽證會，請在你的聽證會前至少提前五天（5個日曆日）打電話到909-396-2500或發電子郵件到 clerkofboard@aqmd.gov 與局裏的辦事人員聯絡。並且明確說明你的案子的名稱和號碼，聽證日期，以及你要求的翻譯的語種。
Japanese	公聴会（ヒアリング）に参加するために通訳が必要な場合、少なくとも5日前までに事務局（Clerk of the Board）にご連絡ください。電話でのご連絡は909-396-2500、e-メールでのご連絡は clerkofboard@aqmd.gov . までお願いします。その際、案件名（case name）と案件番号（case number）、ヒアリングの日付、通訳が必要な言語を特定して下さい。
Korean	“만약 귀하나 귀하의 증인들이 심리에 참여하기 위해 통역사가 필요하시면, 심리일 5일 전까지 기관부서의 서기에게 909-396-2500으로 연락하시거나, clerkofboard@aqmd.gov 로 연락 하십시오. 통역이 필요하신 사건의 이름, 심리날짜, 그리고 언어를 정확하게 말씀해 주십시오.”
Spanish	Si usted requiere un intérprete para poder participar en la audiencia, favor de comunicarse con el Secretario de la Junta cuando menos cinco (5) días hábiles antes de su audiencia al teléfono (909) 396-2500 ó por correo electrónico al clerkofboard@aqmd.gov . Especifique el nombre y el número de su causa, la fecha de la audiencia y el idioma del cual está solicitando el intérprete.
Tagalog	“Kung kailangan ninyo nang interpreter sa Pilipino para makasali kayo sa pagdinig sa kaso, tumawag lang po kayo sa Clerk of the Board sa numero 909-396-2500 or kung hindi mag-email kayo sa email clerkofboard@aqmd.gov . Kailangan na tumawag kayo sa loob nang limang araw (5 days) bago ang inyong hearing date at itingay and inyong pangalan at case number, araw nang inyong pagdinig sa kaso at inyong gusto na may lenguahe na interpreter”.
Thai	หากคุณต้องการล่ามในการขึ้นศาล ให้ติดต่อเจ้าหน้าที่ล่วงหน้าอย่างน้อย 5 วันก่อนวันขึ้นศาล โดยติดต่อที่เบอร์โทร 909-396-2500 หรือโดยe-mailที่ clerkofboard@aqmd.gov ให้บอกชื่อและหมายเลขของคดี พร้อมทั้งวันเวลาในการขึ้นศาล และภาษาที่คุณต้องการล่าม

Exhibit 1



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
PERMIT TO CONSTRUCT

Page 1
Application No.
664738

Granted as of 2/4/2026

ID 120829

**Legal Owner
or Operator:**

STERIS, INC.
43425 BUSINESS PARK DR
TEMECULA, CA 92590

Equipment Location: 43425 BUSINESS PARK DR, TEMECULA, CA 92590

Equipment Description :

Air Pollution Control System of Permanent Total Enclosure (PTE) consisting of:

Enclosure, Permanent Total Enclosure No. 1, Total Area of 12,415 Sq. Feet, with Negative Air Containing Areas Encompassing One (1) Chamber Room Containing Six (6) Sterilization Chambers, One (1) Ethylene Oxide Drum Room, and One (1) Aeration Room.

Including:

Ethylene Oxide Air Pollution Control System, consisting of:

1. Dry Bed System, DB-4, consisting of Two (2) Dry Bed Scrubbers, Advanced Air Technologies, Inc, Model No. DR-490B/C, 5'-4" W. x 6'-4" L. x 6'-5" H. Per Scrubber, Containing a Minimum of 900 Pounds of Reactant Media Per Bed.
2. Exhaust System No. 1, One (1) 15 HP Blower, 3,000 CFM, Controlling Off Gases from the Drum (Gas Storage) Room and Vented to the Chamber Room.
3. Adsorb/Desorb Tank, "Peak Shaver", Anguil Environmental Systems, Inc., Model No. SPT-42-120, 12'-0" Dia. x 26'-0" H., 7,000 Gallons Capacity, with a 20 HP Blower, and Associated Pumps and Motors.
4. Catalytic Oxidizer, Donaldson, Model 20000 SCFM, 14'-0" W. x 33'-8" L. x 7'-0" H., One Low NOx Burner, Maxon, Model CROSSFIRE Straight 1.5ELXFSTR, 3.75 MMBtu/hr, Natural Gas Fired, with a Prefilter, a Heat Exchanger, and a 5 HP Combustion Air Blower.
5. Exhaust System No. 2, One (1) 125 HP Blower, Rated at 25,000 CFM, Controlling Off Gases from all EtO Sterilization Chambers, Chamber Room, Peak Shaver, and Aeration Rooms and Vented to the Catalytic Oxidizer.
6. Exhaust System No. 3, One (1) 60 HP Blower, Rated at 10,000 CFM, Controlling Off Gases from the Chamber Room and Vented to Air Pollution Control System DB-1.

ORIGINAL



PERMIT TO CONSTRUCT

Conditions :

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
2. This equipment shall be properly maintained and kept in good operating condition at all times.
3. A gauge shall be installed and maintained to indicate, in inches of water column, the differential pressure drop across Dry Bed Scrubber System DB-4. The pressure differential shall be between 2.0 inches to 8.0 inches of water column during operation of this equipment and shall be recorded at least once per week.
4. This equipment shall operate in compliance with all applicable requirements of Rule 1405.
5. The air pollution control system shall be in full use whenever drums containing EtO are stored in the drum room and whenever the sterilization chambers and/or aeration rooms are in operation.
6. The operator shall implement a Leak Detection and Repair (LDAR) to monitor all components of the Control System up to the exhaust stack that are not within Permanent Total Enclosure. All components and elements of the LDAR program shall be leak tested every 60 calendar days thereafter in accordance with the requirements of Rule 1405, using the latest CARB Test Method 21, or other alternate method approved in writing by the Executive Officer.
7. Operation of this equipment shall not result in the release of uncontrolled ethylene oxide into the atmosphere. Any breakdown or malfunction which results in emissions of uncontrolled ethylene oxide shall be reported pursuant to Rule 430 requirements.
8. The operator of this equipment shall comply with all applicable requirements specified in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Ethylene Oxide commercial sterilization and fumigation operations under Code of Federal Regulations, Title 40, Part 63 Subpart O (40 CFR 63, Subpart O) and all applicable requirements specified in Ethylene Oxide Airborne Toxic Control Measure (ATCM) for sterilizers and aerators, Parts 1 and 2 under Title 17 of California Code of Regulations, Sections 93108 and 93108.5 (17 CCR, Sections 93108 & 93108.5).
9. The owner or operator shall conduct a source test according to the implementation schedule listed in Rule 1405, unless otherwise approved in writing by the Executive Officer, to demonstrate compliance with the following stack emission requirements listed below in Rule 1405. The owner or operator shall conduct subsequent source tests to comply with this Condition no later than 12 months of the most recent source test, unless they monitor the Control System by operating a SCEMS or CEMS that is certified by the Executive Officer and conduct an annual Relative Accuracy Test Audit (RATA) for the SCEMS or CEMS monitoring the Control System:
 - A. For each Control System either;
 - i. Meet a control efficiency of 99.99% or greater, by weight, of Ethylene Oxide emissions; or
 - ii. Not exceed an Ethylene Oxide concentration of 0.01 parts per million (ppm), by volume at stack conditions.
 - B. The facility-wide mass emission rate from all exhaust stacks for all Control Systems at the facility does not exceed either:

ORIGINAL



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
PERMIT TO CONSTRUCT

Page 3
Application No.
664738

- i. 0.015 pounds per hour (lbs/hr) of Ethylene Oxide; or
 - ii. A calculated facility-wide mass emission rate of Ethylene Oxide, based on permitted Ethylene Oxide usage and the required control efficiency of 99.99% or greater, by weight, determined pursuant to Appendix 1 in Rule 1405.
10. The initial source test after modification and subsequent source tests shall be conducted under the following requirements:
 - A. The test shall be performed by a testing laboratory certified by the California Air Resources Board or South Coast AQMD Laboratory Approval Program (LAP) in the required test methods for criteria pollutant(s) to be measured, and in compliance with South Coast AQMD Rule 304 (No Conflict of Interest).
 - B. The source test shall be conducted under the following requirements and in accordance with CARB Test Method 431, EPA Method TO-15, TO-15A, or an acceptable source testing method approved by the Executive Officer:
 - i. Ethylene oxide emissions at all inlets of the Control System, in lb/hr
 - ii. Ethylene oxide emissions at all exhausts of the Control System at stack conditions, in ppmv and lb/hr
 - iii. Inlet and Exhaust flowrates (acfm and dscfm)
 - iv. Control efficiencies (%), calculated on a mass basis
 - C. Triplicate runs shall be conducted at either typical operating conditions or at maximum operating parameters, with each run being a minimum of 60 minutes.
 - D. Sampling facilities shall comply with South Coast AQMD guidelines for construction of sampling and testing facilities pursuant to Rule 217.
 - E. Notification of the source test shall be provided 10 days prior to the commencement of the source test so that a South Coast AQMD representative can be present. Notification shall be made to: Rule1405notifications@aqmd.gov, bwelch@aqmd.gov, and cpolintan@aqmd.gov.
11. In addition to Rule 1405 compliance requirements, the following information shall be recorded during testing and provided in the test report(s):
 - A. Differential pressure across dry bed scrubbers (DB-4) (in H₂O)
 - B. Catalytic oxidizer temperature, in degrees Fahrenheit
 - C. Differential pressure across dry bed scrubbers (DB-1) (in H₂O)
12. Two complete copies of the source test report shall be submitted to the South Coast AQMD (addressed to Attn: Clarisse Polintan, South Coast Air Quality Management District, 21865 Copley Drive, Diamond Bar, CA 91765), within 60 days after the source testing date. The source test shall include but not be limited to, all testing data required by this permit.
13. The operator shall maintain the PTE, according to the implementation schedule listed in Rule 1405, at a negative pressure of at least 0.007 inches of water column averaged over a rolling one (1) hour period and demonstrate an inward air velocity of at least 200 feet per minute (fpm) at each natural draft opening at least once per calendar quarter.

ORIGINAL



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
PERMIT TO CONSTRUCT

Page 4
Application No.
664738

14. The operator shall install, operate, and maintain a digital pressure monitoring system for the PTE according to the implementation schedule listed in Rule 1405 wherein:
- A. A minimum of one (1) digital differential pressure monitor at each of the following three (3) walls in the PTE having a total ground surface area of 10,000 square feet or more: the leeward wall, the windward wall and an exterior wall that connects the leeward and windward wall at a location defined by the intersection of a perpendicular line between a point on the connecting wall and a point on its furthest opposite exterior wall.
 - B. Certified by the manufacturer to be capable of measuring and displaying negative pressure in the range of 0.005 to 0.110 inches of water column with a minimum increment of measurement of plus or minus 0.001 inches of water column.
 - C. Digital differential pressure monitoring systems for the PTE shall be equipped with a continuous strip chart recorder or electronic recorder approved by the Executive Officer. If an electronic recorder is used, the recorder shall be capable of writing data on a medium that is secure and tamper-proof.
 - D. Digital differential pressure monitoring systems for the PTE shall be calibrated in accordance with manufacturer's specifications at least once every 12 calendar months or more frequently if recommended by the manufacturer.
 - E. Digital differential pressure monitoring systems for the PTE shall be equipped with a backup, uninterruptible power supply to ensure continuous operation of the monitoring system during a power outage.
 - F. The differential pressure reading shall be recorded at a minimum of every one (1) minute for each differential pressure monitor;
15. All access doors in process, storage, and shipping areas shall be kept closed at all times except when they are in active use.
16. The catalytic oxidizer shall operate in compliance with all applicable requirements of Rule 1147.
17. This catalytic oxidizer shall be fired on natural gas only.
18. The temperature of the catalyst bed shall be maintained at no less than 320 degrees Fahrenheit. The operator shall install and maintain a temperature reading device to accurately indicate the temperature of the catalyst bed.
19. The burner of this air pollution control system shall comply with the following emission limits:
- NOx: 30 ppm @3% O₂
CO: 400 ppm @3% O₂
- The emission limits apply when burning 100% natural gas fuel and not when the burner is incinerating air toxics, VOCs, or other vapors.
20. The operator of this equipment shall conduct a source test on the catalytic oxidizer's burner every five years, pursuant to the following requirements to verify compliance with Condition No. 19 and Rule 1147.

ORIGINAL



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
PERMIT TO CONSTRUCT

Page 5
Application No.
664738

- A. The source test shall be conducted by an independent, qualified testing laboratory and conducted in accordance with acceptable South Coast AQMD procedures and test methods outlined in applicable South Coast AQMD rules and regulations.
 - B. The test shall measure NOx, carbon dioxide, oxygen content, moisture content, temperature, and the exhaust flow rate at the outlet of this equipment, at the maximum heat input that the unit normally operates, using the appropriate test methods specified in Rule 1147. The report shall present the emission data in pounds per hour and parts per million on a dry basis corrected to 3% oxygen.
 - C. The test(s) shall determine the firing rate (as percent of the rated heat input capacity) of the burner during the test.
 - D. The South Coast AQMD shall be notified of the date and time of the test at least 14 calendar days prior to the test or within a time period agreed upon by the South Coast AQMD.
21. The operator shall perform combustion system maintenance in accordance with manufacturer recommended maintenance schedule. Copy of the manufacturer's manual or other written guidance materials supplied by the manufacturer or distributor and records of maintenance activities shall be retained on-site for at least five years and shall be made available to South Coast AQMD personnel upon request.
22. Records shall be maintained to demonstrate compliance with the conditions in this permit. Records shall be kept in a format acceptable to the South Coast AQMD, shall be retained at the facility for a minimum of five years, and shall be made available to the South Coast AQMD personnel upon request.

ORIGINAL



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
PERMIT TO CONSTRUCT

Page 6
Application No.
664738

Approval or denial of this application for Permit to Operate the above equipment will be made after an inspection to determine if the equipment has been constructed in accordance with the approved plans and specifications and if the equipment can be operated in compliance with all applicable Rules and Regulations of the South Coast Air Quality Management District (SCAQMD).

Please notify CLARISSE POLINTAN at (909) 396 - 2685 when construction of equipment is complete.

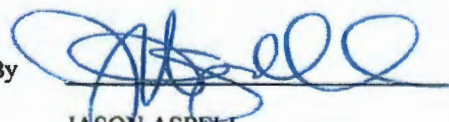
This Permit to Construct is based on plans, specifications, and data submitted as it pertains to the release of air contaminants and control measures to reduce air contaminants. No approval or opinion concerning safety and other factors in design, construction or operation of equipment is expressed or implied.

This Permit to Construct shall serve as a temporary Permit to Operate provided the Executive Officer is given prior notice of such intent to operate.

This Permit to Construct will become invalid if the Permit to Operate is denied or if the application is cancelled. This PERMIT TO CONSTRUCT SHALL EXPIRE ONE YEAR FROM THE DATE OF ISSUANCE unless an extension is granted by the Executive Officer.

DMB/CP06

By


JASON ASPELL
DEPUTY EXECUTIVE OFFICER

ORIGINAL

Exhibit 2

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	Lubricate catalytic oxidizer blower bearings, inspect main blower for any unusual noises and signs of wear or vibration Inspect combustion blower for any unusual noises and signs of wear or vibration Record Dwyer Magnehelic Gauge (PDI111A) reading at the catalyst bed inlet Record Dwyer Magnehelic Gauge (PDI111B) reading at the catalyst bed outlet
Semiannual PM Abator Thermocouple Probe Change Out	Install the replacement thermocouple probe and record the probe number indicated on the tag Record the certification expiration date for the thermocouple probe
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	Inspect blower for any unusual noises and signs of wear or vibration Add 12 oz of de-foaming agent to peak shaver sump Record recirculation water gallons per minute reading Inspect recirculation pump for any unusual noises and signs of wear or vibration Inspect the recirculation PVC piping for leaks Record recirculation water pressure in PSI

Exhibit 3

Notice to Comply	Status
Notice to Comply E58618 (December 24, 2025)	Request for various records to demonstrate compliance with South Coast AQMD rule requirements and permit conditions. Consistent with extension, all requested records were provided on January 13, 2026. Follow-up questions received from Air District staff on February 3, 2026. All requested records were provided on February 6, 2026.
Notice to Comply E62358 (May 29, 2026)	Requested information to determine compliance with Rule 430(b) requirements involving breakdown reports. Information and follow-up responses provided to Air District staff by June 10, 2026.



NOTICE TO COMPLY

Facility Name: Steris, Inc.	Facility ID #: 120829	Sector: EO
Location Address: 43425 Business Park Dr.	City: Temecula	Zip: 92590
Mailing Address: 43425 Business Park Dr.	City: Temecula	Zip: 92590

This Notice to Comply is being issued to:

- D Request additional information needed to determine compliance with clean air requirements.
- D Correct a minor violation found during an inspection.

Failure to respond or take corrective action, or providing false statements in response to this Notice to Comply can lead to issuance of a Notice of Violation pursuant to the California Health and Safety Code. The facility cited above is subject to re-inspection at any time to ensure compliance.

YOU ARE HEREBY DIRECTED TO COMPLY WITH:

#	AQMD RULE/ CAL H&S CODE	REQUIREMENT	COMPLIANCE DUE DATE	COMPLIANCE ACHIEVED DATE
1	42303	For Permits to Operate G80361, G80362, and G80363 (same permit conditions) provide: - A list indicating the operational status of this equipment, including any ID numbers used by the facility to identify the equipment - Manufacturer specifications (manual or data place if accessible) showing model number, dimensions, number of dry bed scrubbers, media capacity, and horsepower rating for each piece of equipment. - Weekly logs showing pressure differential readings for the 2025 calendar year. - Records of any breakdown or malfunction in the 2025 calendar year. - Records of EtO concentration measurements (Condition 9 of permits). - Copy of latest source test reports, including Rule 1405 emission limits. - Quarterly measurements of inward air velocity of Permanent Total Enclosure (PTE) for 2025. - Records of digital pressure monitoring system requirements in Condition 15	1-9-26	
2	42303	For Permit to Operate G72323 provide: - The operational status of this equipment, including any ID numbers used by the facility to identify the equipment - Manufacturer specifications (manual or data place if accessible) showing model number, dimensions, BTU rating, and horsepower rating for each piece of equipment - A photo of a temperature gauge indicating the temperature of the catalyst bed. - A photo of a continuous monitoring device indicating the operating temperature of the equipment - Records of leak tests conducted in 2025 - Records of any breakdown or malfunction in the 2025 calendar year - Copy of latest source tests and proof of compliance with Rule 1147 and Rule 1405 - Provide records of latest activity test and combustion system maintenance	1-9-26	

Served To: Earl Marcum	Served By: Mel Valdivia		
Title: Senior Environmental Compliance Manager	Date Served: 12/24/2025	Phone: 909-396-2070	Fax:
Email Address: earl_marcum@steris.com	Phone: 216-970-1370	Email Address: mvaldivia	Forms/Applications/Info available at: @aqmd.gov www.aqmd.gov

I hereby certify that the facility cited in this Notice to Comply has achieved compliance with the requirements listed above.

NAME OF OWNER/RESPONSIBLE OFFICIAL	TITLE	SIGNATURE	DATE
------------------------------------	-------	-----------	------

Instructions:

- For each minor violation cited above, compliance shall be achieved by the compliance deadline specified for that particular violation.
- Within 5 working days of achieving compliance for each respective violation, the owner/responsible officer of the cited facility must complete and return a signed copy of this Notice to Comply to the South Coast Air Quality Management District at the address listed above.
- Please copy and return this Notice to Comply as many times as necessary to provide the required information. On each copy, include the date on which compliance was achieved. **Date, sign, and send all completed copies to the attention of the inspector named above**



South Coast Air Quality Management District
21865 COPLEY DR., P.O. Box 4941, DIAMOND BAR, CA 91765-0941

12 / 5 / 25

DATE OF INSPECTION

NOTICE TO COMPLY

Facility Name: Steris, Inc. Facility ID#: 120829 Sector: EO

This Notice to Comply is being issued to:

- ☐ Request additional information needed to determine compliance with clean air requirements.
☐ Correct a minor violation found during an inspection.

Failure to respond or take corrective action, or providing false statements in response to this Notice to Comply can lead to issuance of a Notice of Violation pursuant to the California Health and Safety Code. The facility cited above is subject to re-inspection at any time to ensure compliance.

YOU ARE HEREBY DIRECTED TO COMPLY WITH:

#	AQMD RULE/ CAL H&S CODE	REQUIREMENT	COMPLIANCE DUE DATE	COMPLIANCE ACHIEVED DATE
3	42303	For Permit to Operate F32663 provide: - A photo of the hour meter on the ICE. - A photo of the manufacturer's specifications (manual or data plate if accessible) showing model and serial number and horsepower rating - Records showing the sulfur content of the fuel used with this equipment - Records of any breakdown or malfunctions - Proof of compliance with Rule 1110.2 - Hour logs for 2025	1-9-26	
4	42303	For Permits to Operate F91322, F91323, G35199, G35200, G35201, and G35202 (same permit conditions) provide: - A list indicating the operational status of this equipment, including any ID numbers used by the facility to identify the equipment. Indicate the control device each sterilizer is vented to - Manufacturer specifications (manual or data place if accessible) - Logs indicating the sterilization chamber identification number, the sterilization start-up and completion time, the time of the day when the chamber is purged, and pounds of ETO used for each sterilization cycle shall be maintained for each ETO sterilization chamber. Provide logs for the following dates in 2025: 1/9, 2/5, 3/24, 4/15, 3/8, 6/24, 7/22, 8/14, 9/10, 12/4	1-9-26	
5	42303	For Permit to Operate F19326 provide: - The operational status of this equipment, including any ID numbers used by the facility to identify the equipment. - Manufacturer specifications (manual or data place if accessible) showing the dimensions of each piece of equipment. - The permit number of the air pollution control system this equipment is vented to	1-9-26	
Served To: Earl Marcum		Served By: Mel Valdivia		
Title: Senior Environmental Compliance Manager		Date Served: 12/24/2025	Phone: 909-396-2070	Fax:
Email Address: earl_marcum@steris.com		Phone: 216-970-1370	Email Address: mvaldivia@aqmd.gov	Forms/Applications/Info available at: www.aqmd.gov

I hereby certify that the facility cited in this Notice to Comply has achieved compliance with the requirements listed above.

NAME OF OWNER/RESPONSIBLE OFFICIAL TITLE SIGNATURE DATE

Instructions:

- For each minor violation cited above, compliance shall be achieved by the compliance deadline specified for that particular violation.
- Within 5 working days of achieving compliance for each respective violation, the owner/responsible officer of the cited facility must complete and return a signed copy of this Notice to Comply to the South Coast Air Quality Management District at the address listed above.
- Please copy and return this Notice to Comply as many times as necessary to provide the required information. On each copy, include the date on which compliance was achieved. Date, sign, and send all completed copies to the attention of the inspector named above

NOTICE #: E58618 (Continued)

Page 2 of 3

FILE COPY (Blue)

FACILITY COPY (Gold)

INSPECTOR COPY (White)



NOTICE TO COMPLY

Facility Name: Steris, Inc. Facility ID#: 120829 Sector: EO

This Notice to Comply is being issued to:

- ☐ Request additional information needed to determine compliance with clean air requirements.
☐ Correct a minor violation found during an inspection.

Failure to respond or take corrective action, or providing false statements in response to this Notice to Comply can lead to issuance of a Notice of Violation pursuant to the California Health and Safety Code. The facility cited above is subject to re-inspection at any time to ensure compliance.

YOU ARE HEREBY DIRECTED TO COMPLY WITH:

#	AQMD RULE/ CAL H&S CODE	REQUIREMENT	COMPLIANCE DUE DATE	COMPLIANCE ACHIEVED DATE
6	42303	- Provide records of facility wide EtO usage for each month of 2025. - Provide a copy of the facility's 2025 Ethylene Oxide (EtO) Airborne Toxic Control Measure (ATCM) report.	1-9-26	
7	42303	Provide additional information about the equipment under permit applications 655497 and 660068, specifically, whether the equipment is currently operating and a description of any equipment modifications.	1-9-26	
8	42303	Provide a list indicating the operational status and manufacturer specifications (manual or data plate if accessible) for the following Registered equipment: 520630 - Refrigeration system, 616384 - Boiler, 483506 - Boiler.	1-9-26	
9	42303	- Provide Facility diagrams pursuant to subparagraphs (d)(4)(D), (e)(3)(B), or (f)(3)(B). - Provide all LDAR records for 2025 including Plot-plan, audio-visual checks, and leak inspections/leak tests for all equipment. Provide any records of corrective actions taken.	1-9-26	
10	42303	Provide data from Continuous Emission Monitoring System (CEMS) or Semi-Continuous Emission Monitoring System (SCEMS) showing emissions data for calendar year 2025.	1-9-26	
Served To: Earl Marcum		Served By: Mel Valdivia		
Title: Senior Environmental Compliance Manager		Date Served: 12/24/2025	Phone: 909-396-2070	Fax:
Email Address: earl_marcum@steris.com	Phone: 216-970-1370	Email Address: mvaldivia	@aqmd.gov	Forms/Applications/info available at: www.aqmd.gov

I hereby certify that the facility cited in this Notice to Comply has achieved compliance with the requirements listed above.

NAME OF OWNER/RESPONSIBLE OFFICIAL _____ TITLE _____ SIGNATURE _____ DATE _____

Instructions:

- For each minor violation cited above, compliance shall be achieved by the compliance deadline specified for that particular violation.
- Within 5 working days of achieving compliance for each respective violation, the owner/responsible officer of the cited facility must complete and return a signed copy of this Notice to Comply to the South Coast Air Quality Management District at the address listed above.
- Please copy and return this Notice to Comply as many times as necessary to provide the required information. On each copy, include the date on which compliance was achieved. **Date, sign, and send all completed copies to the attention of the inspector named above**

NOTICE #: E58618 (Continued)

Page 3 of 3



South Coast Air Quality Management District
21865 COPLEY DR., P.O. Box 4941, DIAMOND BAR, CA 91765-0941

NOTICE TO COMPLY

5/14/26

DATE OF INSPECTION

Facility Name: STERIS, INC.		Facility ID: 120829	Sector: E0
Location Address: 43425 BUSINESS PARK DRIVE	City: TEMECULA	Zip: 92590	
Mailing Address: 43425 BUSINESS PARK DRIVE	City: TEMECULA	Zip: 92590	

This Notice to Comply is being issued to:

- ☒ Request additional information needed to determine compliance with clean air requirements.
☐ Correct a minor violation found during an inspection.

Failure to respond or take corrective action, or providing false statements in response to this Notice to Comply can lead to issuance of a Notice of Violation pursuant to the California Health and Safety Code. The facility cited above is subject to re-inspection at any time to ensure compliance.

YOU ARE HEREBY DIRECTED TO COMPLY WITH:

#	AQMD RULE/ CAL H&S CODE	REQUIREMENT	COMPLIANCE DUE DATE	COMPLIANCE ACHIEVED DATE
1	430(b)(1)	FAILED TO REPORT A BREAKDOWN TO THE SOUTH COAST AQMD WHERE THERE WAS A VIOLATION OF A RULE AND/OR PERMIT CONDITION.	5/29/26	
2	↓		↓	
3	430(b)(2)	PROVIDE A BREAKDOWN EMISSIONS REPORT NO LATER THAN 30 CALENDAR DAYS FROM THE INITIAL DATE OF BREAKDOWN.	6/14/26	
4				
5				
6				

Served To: SARA LUPFER		Served By: PETER HOMSEY	
Title: ENVIRONMENTAL COMPLIANCE MNGR.	Date Served: 5/29/26	via email	Phone: 9093963084
Email Address: SARA-LUPFER@STERIS.COM	Phone: 812-430-6655	Email Address: PHOMSEY@aqmd.gov	Fax: www.aqmd.gov

Instructions:

- For each minor violation cited above, compliance shall be achieved by the compliance deadline specified for that particular violation.
- Within 5 working days of achieving compliance for each respective violation, the owner/responsible officer of the cited facility must complete and return a signed copy of this Notice to Comply to the South Coast Air Quality Management District at the address listed above.
- Please copy and return this Notice to Comply as many times as necessary to provide the required information. On each copy, include the date on which compliance was achieved. Date, sign, and send all completed copies to the attention of the inspector named above.

I hereby certify that the facility cited in this Notice to Comply has achieved compliance with the requirements listed above.

NAME OF OWNER/RESPONSIBLE OFFICIAL

TITLE

SIGNATURE

DATE

NOTICE#: **E 62358**

FILE COPY (Blue)

FACILITY COPY (Gold)

INSPECTOR COPY (White)

Exhibit 4

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.