

November 1, 2018

VIA ELECTRONIC DELIVERY

The Honorable Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20004

Dear Acting Administrator Wheeler:

Just days ago, the Chicago Tribune shed light on the multiple ways the administrations of both Illinois Governor Bruce Rauner and President Donald Trump, through inaction or neglect at your department, failed to protect residents of my state from exposure to the toxic chemical ethylene oxide in the area surrounding Sterigenics, a Willowbrook-based company that uses the chemical to sterilize medical products and equipment. Ethylene oxide has been classified as a known carcinogen by the U.S. Environmental Protection Agency (EPA).

In light of this damning report, which also uncovered the intentional and needless delay in public disclosure of known cancer risks, it is critical that the EPA swiftly work to enhance transparency at and restore public confidence in EPA so Illinoisans—and all Americans—can trust that their government is doing everything in its power to protect them.

With that goal in mind, I write to request additional action and information regarding an update EPA staff provided my office on October 29, 2018, regarding stack testing and public engagement conducted and planned in Willowbrook, Illinois.

Specifically, it is critical for you to:

1. Immediately publish online the complete results of the October 19, 2018 stack test conducted at Sterigenics, ideally in a machine-readable, open format. This is not confidential information and the longer it is inaccessible to the public, the longer it can be altered;
2. Immediately publish online the threshold public health standard that EPA will use to determine whether a public health risk remains in Willowbrook. EPA and Sterigenics continue to tout the percentage reduction of fugitive ethylene oxide from the back-vent at the facility with no measure of whether those reductions meet a standard that is protective of public health;
3. Publish online and provide my office with information on the upgrades from prior years' configuration made in advance of the testing (information which EPA may obtain pursuant to Section 114 of the Clean Air Act (CAA)) and confirm whether EPA staff requested this information.

4. Publish online and provide my office with a hard copy no later than one week before the November 29, 2018 community meeting with EPA, the requests for information made upon Sterigenics under Section 114 of the CAA, the Company's response, and notes or reports of any Agency inspections and interviews conducted; and
5. Publish online and provide my office no later than one week before the November 29, 2018 community meeting with EPA, any additional information regarding Sterigenics' emissions.

Troublingly, EPA has indicated that it is using modeling to direct the placement of air monitors, despite several public safety concerns associated with that method. To alleviate those concerns, the EPA must:

1. EPA includes reasonable worst case conditions and the very worst case conditions in its models. Willowbrook will not be reassured by a model conducted under the most ideal scenarios, fabricated by a stack test for which the facility has weeks to prepare.
2. Use continuous monitoring at fence-line concentrations rather than the every third-day schedule EPA is currently planning. Title V of the CAA gives EPA the authority to provide continuous stack and fence-line monitoring and real-time reporting. Continuous monitoring is the only type of monitoring that has the capacity to determine what impact Sterigenics has on Willowbrook under non-ideal circumstances.

One area of information that has been lacking from EPA's response are its efforts around health monitoring. To reiterate my longstanding request, I urge EPA to conduct health monitoring and specifically request these efforts prioritize vulnerable populations like children. Health monitoring will ensure EPA is able to convey the full extent of the public health risk, if any, to the community. Because ethylene oxide enters and exits the body quickly, monitoring will be far less helpful after exposures are reduced.

Simply put, health status surveys or medical diagnoses must happen quickly, not after the company has "solved" the problem.

I appreciate your attention and timely response to this urgent request.

Sincerely,



Tammy Duckworth
United States Senator