



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Air Protection Branch

4244 International Parkway
Suite 120
Atlanta, Georgia 30354
404-363-7000

April 1, 2020

Ms. Kathleen Hoffman
Senior Vice President – Global Environmental, Health & Safety and Technical Services
Sterigenics U.S. LLC
2015 Spring Road, Suite 650
Oak Brook, IL 60523

RE: Georgia Air Quality Permit 7389-067-0093-S-05-0
Permit Application No. 27153
Sterigenics, U.S. LLC, Atlanta, Georgia

Dear Ms. Hoffman:

I write to notify you that Air Quality Permit 7389-067-0093-S-05-0 which was issued to Sterigenics U.S. LLC (“Sterigenics”) on May 27, 2014, for the operation of Sterigenics’ Atlanta facility in Cobb County, Georgia (“the Facility”), as amended, remains in effect until the Division has taken final action with regard to Permit Application No. 27153 submitted to the Division on July 31, 2019. *See* O.C.G.A. § 50-13-18(b) (“When a licensee has made timely and sufficient application for the renewal of a license or for a new license with reference to any activity of a continuing nature, the existing license does not expire until the application has been finally determined by the agency...”).

As you know, on August 7, 2019, the Director executed Consent Order No. EPD-AQC-6980 with Sterigenics to establish an enforceable agreement whereby, among other things, Sterigenics would install new pollution control equipment to reduce its emissions of ethylene oxide at the Facility. The Division approved both a testing protocol for Sterigenics’ new pollution control equipment and Sterigenics’ Work Practice Plan on October 31, 2019. On March 24, 2020, EPD staff attended a negative pressure test at the Facility. While there, EPD staff observed that the new pollution control equipment has been installed and is operational.

EPD understands that Sterigenics intends to commence full operations as soon as possible in light of the Temporary Restraining Order (TRO) issued in the United States District Court for the Northern District of Georgia today.¹ The Division expects that Sterigenics will operate its facility at all times using the new pollution control equipment, the indoor air capture system including the dry bed system, and the modified control device configuration on the sterilization chambers. In addition, the Division expects that all emissions will be routed through the taller stacks at the Facility. These measures submitted as part of

¹ EPD is not a party to the litigation underlying the TRO and does not intend to imply with this letter that it takes any position with regard to the pending litigation. This letter is merely intended to provide guidance to Sterigenics regarding EPD’s expectation for the operations of the Facility.

Sterigenics' permit application are designed to significantly reduce the Facility's ethylene oxide emissions.

The Division expects Sterigenics to implement the EPD-approved testing protocol. The Division is aware that, under the approved testing protocol, testing cannot commence until Sterigenics is sterilizing at the Facility's maximum loading. Sterigenics must commence testing as soon as the Facility is operating at maximum loading and must notify EPD prior to testing.

Lastly, the Division expects Sterigenics to report any spill or release of ethylene oxide, regardless of the amount, to the Division in writing within 24 hours of discovering such spill or release.

Thank you for your cooperation. If you have any questions concerning this correspondence, please feel free to contact Sean Taylor at 404-363-7047 or Sean.Taylor@dnr.ga.gov.

Sincerely,

A handwritten signature in black ink that reads "Karen Hays". The signature is written in a cursive, flowing style.

Karen D. Hays, P.E.
Chief
Air Protection Branch

KDH:sgw

c: Daryl Mosby, Sterigenics