



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

May 27, 2020

Submitted electronically to wilfruizcaban@conmed.com

Mr. Wilfredo Ruiz-Caban
Executive Vice President, Regulatory Affairs/Quality Assurance & Operations
CONMED Corporation
525 French Road
Utica, NY 13502

Re: **Request for Information**
CONMED Corporation – Lithia Springs, Georgia

Dear Mr. Ruiz-Caban:

In late 2016, the U.S. Environmental Protection Agency determined that ethylene oxide was a carcinogen and updated their risk calculations. In August 2018, US EPA released the 2014 National Air Toxics Assessment (NATA). While previous NATAs had not shown elevated cancer risk from ethylene oxide in Georgia, the 2014 NATA identified some census tracts in Georgia requiring further study, with potentially elevated cancer risks due to ethylene oxide emissions. While your facility is not located in one of these census tracts, a warehouse and distribution facility elsewhere in Georgia has shown higher than anticipated fugitive emissions from storage of ethylene oxide-sterilized medical products. It is believed that your facility currently packages medical devices, sends them out for ethylene oxide sterilization, and then receives the sterilized products back for eventual distribution. With this letter, the Georgia Environmental Protection Division (EPD) is requesting information needed to evaluate the impact of your facility's operations on nearby residents and to determine if your facility is required to submit a permit application.¹

Section 391-3-1-.02(6)(b)1. of the Georgia Air Rules for Air Quality Control provides that any person engaged in operations which cause emissions to be released into the atmosphere which may result in air pollution may be required to install, maintain, and use emission monitoring devices, to sample such specific emissions as prescribed by the EPD Director; to make periodic reports on the nature and amounts of emissions and provide such other information as the Director may reasonably require; and to maintain records as the Director may prescribe so as to determine whether emissions from such operations are in compliance with the provisions of the Act or any rules and regulations promulgated there under. EPD hereby invokes this authority to request an estimate of the rate of fugitive ethylene oxide emissions from the ConMed Corporation facility at 1250 Terminus Drive, Building 100, Lithia Springs, Georgia.

Within 30 days of receipt of this correspondence, please submit to EPD the following information: types of products stored that have been sterilized with ethylene oxide, a total estimate of sterilized product stored

¹ Facilities that emit more than 2 tons per year, or more than 15 pounds per day maximum of any single hazardous air pollutant are required to obtain an air quality permit.

at the facility, information about how long products are stored at the facility and total storage space used for storing sterilized products, and any other information that the Company deems pertinent to the information request. If the facility is storing product sterilized with ethylene oxide, EPD requests, within 45 days of receipt of this letter, a test plan to be submitted for determining the rate of fugitive ethylene oxide emissions from your facility. Once the test plan is approved by EPD, please provide EPD a notice of the proposed test date in sufficient time in order to afford us the opportunity to witness and/or audit the test.

The information requested above will be used to determine if your facility requires an air quality permit. For any questions or more information regarding this letter, please contact Stephen Damaske at (404) 363-7067 or Stephen.Damaske@dnr.ga.gov. For questions about testing, please contact Dan McCain at (404) 363-7120 or Daniel.McCain@dnr.ga.gov.

Sincerely,



Sean Taylor
Program Manager
Stationary Source Compliance Program

SMT:sdd