



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

August 10, 2020

Submitted electronically to DanielJonas@conmed.com

Daniel S. Jonas, Esq.
Executive VP – Legal Affairs, General Counsel & Secretary
CONMED Corporation
525 French Road
Utica, NY 13502

RE: Request for Air Toxics Assessment
CONMED Corporation - Lithia Springs, Georgia

Dear Mr. Jonas:

The Division sent a request for information to CONMED Corporation on May 27, 2020, regarding the storage of products sterilized with ethylene oxide at your facility in Lithia Springs, Georgia. Your response to the information request indicated that your facility does store medical products that have been sterilized using ethylene oxide. Additional information was also provided calculating an amount of fugitive ethylene oxide being 307 pounds per year from the storage and off gassing of ethylene oxide from products. The information provided also used a factor of 2 to account for off gassing from packaging and pallets to calculate possible emissions of 614 pounds. Based on engineering tests that have been conducted by a sterilization company in Georgia, and the information currently available to the Division, this factor appears to be a reasonable estimate. While this amount is under the 2-ton individual Hazardous Air Pollutant (HAP) limit for requiring permitting, Section 391-3-1-.02(2)(a)(3) of the Georgia Air Rules for Air Quality Control provides that, notwithstanding any other emission limitation or other requirement in the regulations, more stringent emission limits or other requirements may be required of a facility as deemed necessary by the Director to (i) meet any existing Federal laws or regulations; or (ii) to safeguard the public health, safety and welfare of the people of the State of Georgia. The Division hereby invokes this authority to request a detailed Air Toxics Ambient Impact Assessment for your facility.

Within 60 days of receipt of this correspondence, please submit a detailed Air Toxics Ambient Impact Assessment following the current Georgia Guideline for Ambient Impact Assessment for Toxic Air Pollutants. Guidance for these requirements can be found at: <https://epd.georgia.gov/air-protection-branch-technical-guidance-0/air-quality-modeling>.

Should the Assessment indicate no elevated risk from the facility, emissions testing must be performed as soon as practicable, but no later than December 1, 2020, in order to confirm any assumptions made in the air toxics model. A test plan must be provided to the Division at least 30 days prior to the date of the testing, and a 30-day prior written notice of the test date and time must be provided to the Division in order to afford us the opportunity to witness and/or audit the test.

Should the Assessment indicate an elevated risk from the facility, a permit application must be provided to the Division within 30 days of completion of the Assessment. The permit application will be required to include an emissions control system installed on sterilized medical product storage areas to reduce ethylene oxide emissions from the facility. This application must also include updated modeling showing that the added controls lower the risk to an acceptable level. A schedule for installation of the equipment and subsequent testing on the installed equipment effectiveness should be included with the application. The control equipment shall be installed as soon as practicable, but no later than January 31, 2021. Testing to verify the effectiveness of the control system would then be required within 90 days of installation. The test plan and written notice referenced above would also be required within the specified timelines.

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 the permitting process, please contact Heather Brown at (404) 362-2511 or heather.brown@dnr.ga.gov. For questions about the toxic impact modeling, please contact Byeong Kim at (404) 362-4851 or at Byeong.Kim@dnr.ga.gov.

Sincerely,



Sean Taylor
Program Manager
Stationary Source Compliance Program

SMT:sdd

CC: john.griffith@us.dlapiper.com, EricaVisokey@conmed.com, Paul.Wierenga@us.dlapiper.com