



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

**Richard E. Dunn, Director**

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**Air Protection Branch**

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

**September 4, 2020**

**Via Electronic Transmission to [Jeremy.Currithers@cardinalhealth.com](mailto:Jeremy.Currithers@cardinalhealth.com)**

Mr. Jeremy Currithers  
Director of Operations, Global Replenishment Center  
Cardinal Health  
110 Kendall Park Lane South  
Atlanta, GA 30336

**RE: Notice of Violation**  
Operating without an Air Quality Permit  
KPR LLC, US Warehouse, Atlanta, Georgia

Dear Mr. Currithers:

This letter serves as a Notice of Violation of the Georgia Rules for Air Quality Control (Georgia Rules) to Cardinal Health for operating the KPR LLC, US warehouse (Warehouse), located at 110 Kendall Park Lane South, Atlanta, Georgia, without an air quality permit.

Subparagraph 391-3-1-.03(2)(a) of the Georgia Rules requires any person operating a facility or performing an activity which is not exempt under paragraph 391-3-1-.03(6) from which air contaminants are or may be emitted to obtain an Operating (SIP) Permit from the EPD Director.

On June 26, 2020, Cardinal Health contacted the Environmental Protection Division via phone call. During this call, Cardinal Health indicated that the Warehouse stores product sterilized using ethylene oxide (EtO) at several medical sterilizing facilities in the Southeastern United States. Cardinal Health further indicated that monitoring had been performed at the Warehouse that showed the need for a permit due to greater than 2 tons per year of ethylene oxide emissions based on off-gassing from medical products. The Division has received no further information on this report or a permit application as of the date of this letter.

The Division alleges that Cardinal Health has violated Subparagraph 391-3-1-.03(2)(a) of the Georgia Rules by operating the Warehouse without a SIP Operating Permit. To remedy the violations, the Division requires the following actions and/or responses no later than close of business on September 15, 2020:

1. The ethylene oxide monitoring data mentioned in the phone call with a complete report of all findings and estimates of emission data.
2. Updated information on the actions taken or to be taken to address the ethylene oxide emissions at the warehouse.

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3. The amount of product sterilized using ethylene oxide in the warehouse as of the date of this letter, broken down as pallets or other unit, with either an estimate of the amount of EtO used per pallet/unit, or a calculation of the residual EtO in product and packaging upon delivery to the facility per pallet/unit. Information should include typical operations and average storage amounts on an annual basis.
4. The locations of any other warehouses in Georgia in which Cardinal Health places product sterilized using ethylene oxide. Include in your response the amount of sterilized product stored and similar calculations of EtO usage or residuals in the products.
5. Any other information the Company considers relevant to the alleged violation.

Within 45 days of receipt of this letter, the Company shall submit the following items to the Division:

1. A permit application for the Warehouse, including air toxics modeling using the procedures described in EPD's Toxic Impact Assessment Guideline.
2. A schedule for designing and installing air pollution control equipment to capture and control ethylene oxide emissions from the warehouse. The schedule shall not exceed nine months.

The information provided by the Company will be reviewed by the Division and used to determine if further enforcement action, including monetary penalties, is warranted. The Company is not relieved in any way from liability for civil penalties pursuant to Section 23 of the Georgia Air Quality Act by submitting the requested information. Additional information requests may be forthcoming after the Division evaluates the Company's initial responses. If you have any questions concerning this letter, please contact me at 404-363-7047 or sean.taylor@dnr.ga.gov.

Sincerely,



Sean Taylor  
Program Manager  
Stationary Source Compliance Program

SMT:sdd

Cc: Kathryn.Holen@cardinalhealth.com