



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

December 14, 2020

Submitted electronically to awinters@medline.com

Mr. Aaron Winters
Sr. Director Government Affairs
Medline Industries
1 Three Lakes Drive
Northfield, IL 60093

Re: **Request for information**
Medline Warehouses in Georgia

Dear Mr. Winters:

As discussed on November 24, 2020, the Division is requesting information on ethylene oxide emissions due to off gassing at Medline's current and future warehouses in Georgia.

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 facilities are not located in one of these census tracts, nor do they actually use ethylene oxide on site, a warehouse and distribution facility elsewhere in Georgia has shown higher than anticipated fugitive emissions from storage of ethylene oxide-sterilized medical products.

On November 24, 2020, a call was held between Medline and the Division to discuss off gassing from Medline's current and future warehouses in Georgia. During the call it was communicated that around 1% of the product stored or that will be stored in two of the Company's warehouses have been sterilized with ethylene oxide. Medline representatives noted that these products often have a long lead time before arriving at the warehouses post sterilization, resulting in minimal off gassing within the McDonough warehouse. Medline noted that the Richmond Hill warehouse is still under construction, but is also expected to have minimal ethylene oxide emissions as well.

The Division is requesting documentation of this assessment, so that we can ensure that the public is adequately protected.

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 Director hereby invokes this authority to request information about your facility and, if applicable, an estimate of the rate of fugitive ethylene oxide emissions from the Medline Industries warehouse at 1500 Medline Place, McDonough, Georgia.

Within 30 days of receipt of this correspondence, please submit to the Division any pertinent information about the off gassing of EtO from sterilized medical equipment in the McDonough warehouse. Information should include: types of products stored that have been sterilized with ethylene oxide, a total estimate of sterilized product stored at the facility, information about how long products have off gassed before arriving at the facility and amount of time the products may continue to off gas while stored, and any other information that the Company deems pertinent to the information request. Include in your submittal similar estimates based on projected information for the planned Richmond Hill warehouse.

If the McDonough warehouse is storing product sterilized with ethylene oxide that is off gassing, the Division requests, within 45 days of receipt of this letter, a test plan to be submitted for determining the concentrations of ethylene oxide in the applicable portion of your facility and a proposed approach for using those results to estimate the rate of fugitive emissions from your facility. Once the test plan is approved, please provide the Division a notice of the proposed test date in sufficient time in order to afford us the opportunity to witness and/or audit the test.

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