

June 5, 2020

Delivered electronically to: [ewelch@sterilization-services.com](mailto:ewelch@sterilization-services.com)

Eric Welch  
Plant Manager  
Sterilization Services of Georgia  
6005 Boat Rock Blvd  
Atlanta, GA 30336

**Re: Additional Pollution Control Required**

Dear Mr. Welch:

As mentioned in Eric Cornwell's transmittal letter to you regarding Air Quality Permit No. 3841-121-0010-S-03-0, the Division is now seeking further emission reductions of ethylene oxide from the facility. The Division is acting on its authority to require additional controls and work practices in accordance with the Georgia Rules for Air Quality Control, Chapter 391-3-1-.02(2)(a)(3), which states that notwithstanding any other emission limitation or other requirement in the regulations, more stringent emission limitations 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 has determined that air pollution controls shall be installed to capture and control ethylene oxide emissions from the indoor spaces at Sterilization Services of Georgia (SSG) where product treated with ethylene oxide is unloaded, transported, or stored. Similar capture and control systems are being required at other commercial sterilizers currently operating in Georgia.

Additionally, SSG shall develop, implement, and maintain an ethylene oxide leak detection and repair (LDAR) program to check all outdoor components (valves, flanges, fittings, pressure relief valves, etc.) for leaks with weekly monitoring of all components.

By July 31, 2020, SSG shall submit the proposed LDAR program to the Air Protection Branch's Stationary Source Compliance Program for approval. The LDAR program shall be implemented within 15 days of approval.

By August 31, 2020, SSG shall submit an air permit application proposing the air pollution control equipment, capture system, operating parameters, and monitoring that SSG has selected to comply with this request. The proposed system shall be capable of capturing 100% of the indoor air in the workspace areas mentioned above and capable of reducing ethylene oxide by 99%. If this level of capture and control is not achievable at SSG,

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the air permit application shall be accompanied by a detailed justification of a lesser level of capture and/or control.

By December 1, 2020, unless otherwise specified in the resulting air quality permit amendment, SSG shall install, operate and maintain the proposed air pollution control equipment and capture system. By March 1, 2021, unless otherwise specified in the resulting air quality permit, SSG shall conduct performance testing on the installed equipment to verify the effectiveness of the capture and control system. If this schedule is not achievable at SSG, the air permit application shall be accompanied by a detailed justification of an alternative schedule.

Within 10 business days of receipt of this letter, please schedule a conference call or virtual meeting with me and the Air Protection Branch team to discuss the requests described in this letter in more detail.

Thank you for your cooperation. If you have any questions or need more information regarding the permit application, please contact Eric Cornwell at (404) 363-7020 or via email at [eric.cornwell@dnr.ga.gov](mailto:eric.cornwell@dnr.ga.gov). For questions regarding the LDAR program, please contact Sean Taylor at [sean.taylor@dnr.ga.gov](mailto:sean.taylor@dnr.ga.gov). To schedule the meeting, please contact me at (404) 788-3955 or [karen.hays@dnr.ga.gov](mailto:karen.hays@dnr.ga.gov).

Sincerely,



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

C: Steve Siler, [ssiler@altaircorp.net](mailto:ssiler@altaircorp.net)