



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

Compliance Monitoring Report

1. General Information

Date of Inspection: September 25, 2020
Date of Report Completed: October 7, 2020
Compliance Monitoring Category: Announced Inspection
Inspector Name: Sherry Waldron *SW*
Reviewing Manager: Stephen Damaske *S. D.*

2. Facility Information

Facility Name: Sterilization Services of Georgia
Facility AIRS No.: 121-00010
Facility Location: 6005 Boatrock Boulevard
Atlanta, Georgia 30336 (Fulton County)
Facility Mailing Address: Same as above
Facility Contact: Eric Welch, Plant Manager
404-344-8423
CMS Designation: Synthetic Minor Source

Air Quality Permit No. 3841-121-0010-S-03-0

Effective Date: November 7, 2019

Issued for operation of an ethylene oxide sterilization facility and the construction and operation of dry bed reactors (Source Codes DB1 through DB4) to control the sterilization chamber back vents. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

Permit(s) can be accessed at <https://permitsearch.gaepd.org/>

3. Inspection Summary / Recommended Actions:

The facility appeared to be operating in compliance with Georgia Air Quality Permit No. 3841-121-0010-S-03-0 at the time of the inspection. All records reviewed reflected compliance with the permit.

4. Previous Enforcement Actions and Inspections:

The most recent previous inspection was conducted on January 11, 2018.

Consent Order EPD-AQC-7007 was executed on January 7, 2020 for failing to ensure ethylene oxide emissions reduction of at least 99.0% from the sterilization chamber back vents in the time frame required. The facility finished installing the dry bed reactor control devices. The devices were tested in March 2020 and determined to be in compliance. The Order was resolved on June 23, 2020.

Consent Order EPD-AQC-7039 was executed on September 14, 2020 for failing to reduce ethylene oxide emissions from the aeration room vent by at least 99.0%, for failing to submit all test results to the Division within 60 days of completion of testing, and for failing to conduct testing on the sterilization chamber and aeration room vents without prior EPA approval for alternative methods. Payment of the settlement amount is due within 30 days of execution of the Order.

There have been no other enforcement actions at this facility during the previous five years.

See attached Full Compliance Evaluation (FCE) Report for details.

5. Complaint Investigations since last Full Compliance Evaluation:

There have been no complaints received for this facility in the past five years.

6. Applicable Requirements, Description of Regulated Emission Units, and Inspection Determinations:

| Emission Units | | Corresponding Permit Conditions | Air Pollution Control Devices | | Inspection | |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|-------------|------------------------------|--------------------------|
| ID No. | Description | | ID No. | Description | Evaluated During Inspection? | Inspection Determination |
| CH1 CH2 CH3 | 13 Pallet Ethylene Oxide Gas Sterilization Chamber 8 Pallet Ethylene Oxide Gas Sterilization Chamber 13 Pallet Ethylene Oxide Gas Sterilization Chamber | 2.1, 2.2, 2.3, 2.4, 2.7, 3.1, 4.1, 4.2, 4.3, 5.1, 5.4, 6.1, 6.2, 7.1, 7.2, 7.5, 7.6, 7.7, 7.8, 7.9, 7.10, 7.11 | APCD ID No. 1SC – Scrubber | | Yes | In compliance. |
| BV1 BV2 BV3 | CH1 Chamber Back Vent CH2 Chamber Back Vent CH3 Chamber Back Vent | 2.1, 2.3, 2.6, 2.7, 3.1, 4.1, 4.2, 4.3, 5.1, 5.5, 6.1, 6.4, 7.1, 7.2, 7.6, 7.7, 7.8, 7.9, 7.10, 7.11, 7.12 | APCD ID Nos. DB1, DB2, DB3, DB4 Dry Bed Reactors | | Yes | In compliance. |

| Emission Units | | Corresponding Permit Conditions | Air Pollution Control Devices | | Inspection | |
|-------------------|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|-----------------------------------|------------------------------|--------------------------|
| ID No. | Description | | ID No. | Description | Evaluated During Inspection? | Inspection Determination |
| AR1 AR2 AR3 | Enclosed Outgassing Rooms with Exhausts | 2.1, 2.2, 2.3, 2.5, 2.7, 3.1, 4.1, 4.2, 4.3, 4.4, 5.1, 5.2, 5.3, 6.1, 6.3, 6.4, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.9, 7.10, 7.11 | | APCD ID No.1OX Catalytic Oxidizer | Yes | In compliance. |

7. Compliance Monitoring Activities – Details not included in table above:

- a. Describe any deviation from compliance noted during the inspection listed on Table 6: None identified.
- b. Describe any compliance assistance provided during inspection: None.
- c. Describe any action taken by the facility to come back into compliance during the inspection: N/A
- d. Deviations noted during the inspection, not previously listed. Include equipment ID or equipment description and condition number: None

8. Additional Permit Requirements:

- a. Periodic Reports:
See attached Full Compliance Evaluation (FCE) Report for details.
- b. Permit Fees:
Paid as required. See attached Full Compliance Evaluation (FCE) Report for details.
- c. Permit Renewal and Expiration:
Not Applicable.
- d. For any overall emission/production/usage limit:

| Table 8.d. | | |
|------------------|------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Permit Condition | Permit Limit | Actual |
| 2.1 | Limit use of ethylene oxide to 75 tons during any consecutive 12-month period | In compliance. Usage is reported in semiannual reports. All reports indicate the facility is well within this limit. No month in the past 12 reported usage above 6 tons. Current (August 2020) 12-month usage totals of 59.91 tons. |
| 2.4/2.7 | Reduce ethylene oxide emissions from each sterilization chamber vent by at least 99.0%. This applies at all times of facility operation. | In compliance. This was demonstrated for the scrubber on May 13, 2020. The control efficiency was demonstrated to be 99.9992%. |
| 2.5/2.7 | Reduce ethylene oxide emissions from each aeration room vent by at least 99.0%. This applies at all times of facility operation. | In compliance. Tested March 2020. The catalytic oxidizer outlet was less than 1ppm, in compliance with Subpart O requirements, but not in compliance with the permit reduction requirement. The catalyst was replaced and retested on May 12, 2020. The test demonstrated 99.83% destruction efficiency. |
| 2.6/2.7 | Reduce ethylene oxide emissions from each back-chamber vent by at least 99.0%. This applies at all times of facility operation. | In compliance. This was demonstrated on March 11-12, 2020. Test results indicate 99.936% reduction. |
| 3.1 | Take reasonable precautions to prevent fugitive emissions of air contaminants. | In compliance. No signs of fugitive emissions were observed during the inspection. |

9. Attachments:

- a. Inspection Observations:
See attachment
- b. Performance Tests:
See attachment
- c. Full Compliance Evaluation (FCE) Report:
See attachment
- d. Attachment:
Records submittals, e-mailed on September 23-24, 2020

Attachment: Inspection Observations

| Source Code | Equipment Description & Emissions | Control Equipment & Requirements | Observations | Records |
|----------------------------------|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| ID No. 1SC | Sterilization Chambers 1 through 3 – Ethylene Oxide | Scrubber <ul style="list-style-type: none"> • Measure and record scrubber liquor level in the recirculation tanks weekly using liquid level indicator. • Maintain scrubber liquor recirculation tank levels below 9,200 gallons. | Storage tank level was 7,446 gallons at the time of the inspection. Daily checklists are used to track this. | Previously: Scrubber levels recorded daily. No deviations reported. Daily checklists are used. |
| ID No. 1OX | Aeration Chambers 1 through 3 – Ethylene Oxide | Catalytic Oxidizer – <ul style="list-style-type: none"> • Compute and record daily (24-hr avg) oxidation temperature. • Temperature monitor to be accurate within $\pm 10^\circ\text{F}$. • Verify accuracy of temperature monitor twice annually using reference thermometer to NIST or calibrated oven. • 24-hour oxidation temperature above tested levels or 286°F. | Oxidation temperature (instantaneous) was at 286.6°F at the time of the inspection. The calibration records were provided and are attached. Strip charts indicate the temperature is consistently above the set point. | No deviations reported. |
| ID Nos. DB1 DB2 DB3 DB4 | Sterilization Chamber Back Vents 1 through 3 – Ethylene Oxide | Dry Bed Reactors – <ul style="list-style-type: none"> • Collect a 15-minute EtO sample from the inlet and outlet of the dry bed reactors and record it. Calculate the destruction efficiency. If less than 99.1%, replace the dry bed material within 15 days | Most recent determination was on 9-23; 100% control efficiency was determined. | Previously not constructed. |

| Permit Conditions | | Inspection |
|----------------------------|------------------------------------------|-------------------------------------------------------------------------------|
| <u>Process Requirement</u> | | |
| 4.1 | Maintain records of routine maintenance. | In compliance. Records were consistent with compliance with this requirement. |
| 4.2 | Maintain inventory of spare parts. | In compliance. This was provided and is attached. |

| Permit Conditions | | Inspection |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4.3 | Malfunctioning components of air pollution control systems shall be repaired expeditiously by the Permittee. | In compliance. Nothing was observed to indicate noncompliance with this requirement. All components were in good physical condition based on observations at the time of the inspection. |
| 4.4 | Conduct yearly (at least once every 12 months) tests during routine operations using the procedures of 40 CFR 63.365(d). If the percent efficiency is less than 99.0%, the Permittee shall restore or replace the catalyst as soon as practicable but no later than 180 days after conducting the performance test. The Permittee shall notify the Division, in writing, of the date the catalyst is restored or replaced within 15 days of such action. | In compliance. The catalyst was replaced on 3/18/2020. The most recent test was conducted on May 12, 2020. The test demonstrated 99.83% destruction efficiency. |
| 5.1 | All continuous monitors must be in continuous operation except for breakdowns and repairs. | In compliance. No monitoring downtime reported. Continuous monitoring consists of the thermocouples for the catalytic oxidizer. A strip chart is used to record temperature. |
| 5.2, 5.3, 7.5 | Continuously monitor and record temperature at the outlet of the catalyst bed. Temperature must be accurate to within $\pm 10^{\circ}\text{F}$. Verify accuracy of temperature monitor twice annually . Use an independent temp. measurement device. During accuracy checking, use the same location as the monitor being tested; or use a calibrated oven. | In compliance. Strip charts and circle charts were reviewed. The charts show the temperature set point is maintained with very little variation. The thermocouple calibrations from the last two conducted are attached. |
| 5.4 | Measure and record scrubber liquor level for Scrubber 1SC weekly . Current recirculation tank level shall be maintained at or below 9,200 gallons. | In compliance. Scrubber level is recorded more frequently than required. Levels are maintained below the requirement. |
| 5.5 | Collect a 15-minute EtO sample from the inlet and outlet of the dry bed reactors and record it, once per week. Calculate the destruction efficiency. If less than 99.1%, replace the dry bed material within 15 days. Replacement dates shall be recorded. When sampling, the EO loading to the dry bed reactors, loading out of the dry bed reactor system, and the reduction efficiency determined shall be recorded within 3 hours of the sampling event. Keep records. | In compliance. Records indicate sampling is conducted as required. No issues have been identified with the dry bed reactors through sampling at this time. |

| Permit Conditions | | Inspection |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6.2 | Performance test the sterilization chamber vents within 60 days of issuance of the permit and establish the max liquor tank level for the Scrubber. Determine the control efficiency of the scrubber. Test at least once every 12 months. | In compliance. This was demonstrated for the scrubber on May 13, 2020. (Previously in March 2020 as well, but it was retested due to using an alternative method previously unapproved by the EPA). The control efficiency was demonstrated to be 99.9992%. |
| 6.3 | Performance test the aeration room vents within 60 days of issuance of the permit and establish the minimum oxidation temperature for the Catalytic Oxidizer. Determine the final exhaust mass emission rate of EtO and the control efficiency of the oxidizer. Test at least once every 12 months. | In compliance. Tested March 2020. The catalytic oxidizer outlet was less than 1ppm, in compliance with Subpart O requirements, but not in compliance with the required reduction. This was addressed with Consent Order EPD-AQC-7039. The catalyst was replaced and retested on May 12, 2020. The test demonstrated 99.83% destruction efficiency. |
| 6.4 | Performance test the sterilization chamber back vent dry bed reactors within 60 days of completion of their construction. Determine the final exhaust mass emission rate of EtO and the control efficiency of the dry bed reactors. Test at least once every 12 months. | In compliance. Notification was received on December 12 that these would not be finished in the time required. Consent Order EPD-AQC-7007 was executed to address this. Testing was completed on March 11-12, 2020. Test results indicate 99.936% reduction. |
| Recordkeeping | | |
| 7.1 | Maintain records of start-up, shutdown or malfunctions of air pollution control equipment; periods when CMS or monitoring device is inoperative. | In compliance. Batch records provide traceability for startup and shutdowns. There are actuated valves that automatically shut if there is a problem with the oxidizer. Monitoring devices such as the thermocouple have backup/redundancy. |
| 7.2 | Maintain a file of all measurements and all continuous monitoring system performance evaluations, all calibration checks, adjustments and maintenance performed, and all other information required by this Permit. | In compliance. All requested records were available for inspection and/or submittal. |

| Permit Conditions | | Inspection |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7.3 | Compute and record a daily average oxidation temperature from the 12-minute or shorter period temperature values. Strip chart data shall be converted to record a daily average oxidation temperature each day any instantaneous temperature recording falls below the minimum temperature. | In compliance. Strip charts/circle charts were reviewed and indicate the temperature does not vary much and is maintained above the setpoint temperature. |
| 7.4 | Comply with the recordkeeping provisions of 63.367(d) for the Catalytic Oxidizer. | In compliance. Records reviewed appeared to be complete. |
| 7.5 | Maintain general records and continuous monitoring system records as specified in 40 CFR 63.10(b)(2), respectively, and Table 1 of 40 CFR 63 Subpart O. | In compliance. All records reviewed indicated compliance with these requirements. |
| 7.6/7.11 | Submit semi-annual reports, including any deviation of operating parameters: 1. Scrubber liquor level for each scrubber (1SC and 2SC) that is above 9200 gallons or subsequent max value established. 2. 24 hour oxidation temperature below 269°F or subsequent min value established 3. System efficiency less than 99.1% for the dry bed reactors 4. Any time the dry bed material is not replaced as required by 5.5. 5. Report total tons of usage and tons of ethylene oxide emissions for each month in the reporting period. | In compliance. Semi-annual reports submitted as required. No deviations reported. Records reviewed were consistent with reports. |
| 7.7/7.8/7.9 | Maintain daily records of the usage in pounds of EtO. Calculate the monthly usage in tons. If more than 6.25 tons during any calendar month, notify the Division by the 15 th day of the following month. Notify in writing if over 75 tons. | In compliance. Usage information is provided in reports and all usage is below 6 tons in any given month; no notifications have been necessary. |
| 7.10 | Calculate monthly emissions using the equation provided. | In compliance. These are provided in semiannual reports and have been verified. |
| 7.12 | Submit a written notification of the actual date of initial startup of the Dry Bed Reactors within 15 days of such date. | In compliance. Notification was received as required. |
| 8.2 | Pay annual permit fees. | In compliance. Paid as required. |

I arrived at the facility and met with Mr. Welch, Plant Manager, as well as Mr. James Boland, Maintenance Tech. We discussed the purpose of the inspection and started the facility tour. I requested to see the ethylene oxide analyzer, which was new to the facility since the most recent previous formal inspection. The analyzer is operated by Mr. Boland, who showed me the instruction sheet. The instructions include a calibration for each time it is operated. The facility currently uses a methane gas standard to calibrate the machine. The records of each analysis are contained within the system and results are also handwritten on a weekly log.

We next toured the processing areas of the facility, where I observed each permitted unit. We toured the outside area, where the facility's oxidizer and dry bed systems are located. The facility also has an outdoor storage area for EtO drums attached to the side of the building. In each location, I inspected vent systems and components for signs of leakage or poor integrity. No issues were identified. Current parameter readings for the scrubber liquid level and catalytic oxidizer temperature were obtained. Two sterilizers were in operation and no back vents were venting at the time of the inspection.

Some records were requested prior to the inspection in order to minimize the time spent at the facility. The response to the records request referred to equipment repair maintenance procedures and engineering change control procedures. I requested review of these and was able to confirm that maintenance on systems are scheduled to be conducted routinely. For example, a daily inspection and maintenance is conducted on the boiler and vacuum pumps. The air compressor is checked and the chamber door gaskets and switches (valves that automatically shut if the catalytic oxidizer goes down) are checked weekly. The strip chart recorder and air compressor are inspected monthly, and the oxidizer is inspected quarterly. Most work is performed in-house. Spare parts were confirmed to be present on site.

The most recent determination of the dry bed system efficiency was reviewed. It indicated 100% control efficiency. Batch records are used to document periods of startup and shutdown. Selected strip charts and circular charts for the catalytic oxidizer temperature were reviewed; each indicate the temperature is maintained steadily above the temperature set point.

After completing the additional records review, I concluded the inspection and left the facility.

Attachment: Performance Tests

| Source Tested | Pollutant | Date of Test | Required Testing Frequency | Limit | Actual | Percent of Allowable |
|-------------------|-----------|-------------------|----------------------------|--------------------------|----------|----------------------|
| Wet Scrubber | EO | May 13, 2020 | Annually | 99% reduction efficiency | 99.9992% | N/A |
| Dry Bed Scrubbers | EO | March 11-12, 2020 | Annually | 99% reduction efficiency | 99.936% | N/A |
| May 12, 2020 | EO | May 12, 2020 | Annually | 99% reduction efficiency | 99.83% | N/A |

Testing was conducted the week of March 10, 2020 for all control devices. The Catalytic Oxidizer, while indicating an outlet concentration of less than 1ppm, did not demonstrate adequate destruction efficiency. The catalyst was replaced and this unit was re-tested in compliance as shown above. In addition, since an alternative test method (to Subpart O) was used to test the sterilization vent scrubber prior to the EPA authorizing the method, the wet scrubber was retested as well. Authorization for the alternative method was issued by the EPA on March 26, 2020.



Full Compliance Evaluation Report

Sterilization Services of Georgia, Atlanta

121-00010

Facility description: Ethylene-Oxide Sterilizer

6005 Boat Rock Blvd SW
Atlanta, GA 30336

Fulton County
Lat: 33.725, Long: -84.583

Operating status: Operational
Classification: Synthetic minor
CMS status: SM
SIC code: 3841
NAICS code: 333249
Air Programs: SIP, MACT
Classifications: None

Full Compliance Evaluation

FCE Year: 2020

FCE tracking number: 10439

Reviewed by: Waldron, Sherry

Date completed: 29-Sep-2020

On-site inspection conducted

Comments: N/A

Supporting compliance data for September 29, 2019 through September 29, 2020

Inspections

| <u>Tracking #</u> | <u>Date</u> | <u>Inspector</u> | <u>Reason for inspection</u> | <u>Operating</u> | <u>Compliance status</u> |
|-------------------|-------------|------------------|------------------------------|------------------|--------------------------|
| 85541 | 25-Sep-2020 | Waldron, Sherry | Planned Announced | Yes | Compliant |

RMP Inspections

None

Annual Compliance Certifications

None

Reports

| <u>Tracking #</u> | <u>Report period</u> | <u>Date received</u> | <u>Reviewer</u> | <u>Deviations reported</u> |
|-------------------|----------------------|----------------------|-----------------|----------------------------|
|-------------------|----------------------|----------------------|-----------------|----------------------------|

| | | | | |
|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-----------------|-----|
| 85368 | First Semiannual 1-Jan-2020 – 30-Jun-2020 | 8-Sep-2020 | Waldron, Sherry | No |
| | <i>Comments:</i> Subpart O, deviation, EO usage/emissions report | | | |
| 83225 | Second Semiannual 1-Jul-2019 – 31-Dec-2019 | 3-Mar-2020 | Waldron, Sherry | No |
| | <i>Comments:</i> Email copy received on 2/28/2020. Requested additional information per new Condition 7.11 requested via e-mail on 3/11/2020. Acceptable version received via email 4/15 | | | |
| 81620 | Other 25-Dec-2019 | 12-Dec-2019 | Waldron, Sherry | Yes |
| | <i>Comments:</i> Notification that facility not able to meet deadline of December 31, 2019 for installing controls on sterilization chamber back vents as required by Permit Condition 5.5. | | | |

Notifications

None

Source Tests

| <u>Tracking #</u> | <u>Test Ref #</u> | <u>Date received</u> | <u>Reviewer</u> | <u>Compliance status</u> |
|-------------------|---------------------------------------------------------------------------------|----------------------|-----------------|--------------------------|
| 84635 | 202000807 | 28-Jul-2020 | Waldron, Sherry | In Compliance |
| | <i>Source tested:</i> Ethylene Oxide - Chemroxx Wet Scrubber (Stack ID EP4) | | | |
| 84634 | 202000806 | 28-Jul-2020 | Waldron, Sherry | In Compliance |
| | <i>Source tested:</i> Ethylene Oxide - Anguil Catalytic Oxidizer (Stack ID EP5) | | | |
| 84213 | 202000547 | 12-Jun-2020 | Waldron, Sherry | Not In Compliance |
| | <i>Source tested:</i> Ethylene Oxide - Catalytic Oxidizer EP5 | | | |
| 84212 | 202000546 | 12-Jun-2020 | Waldron, Sherry | In Compliance |
| | <i>Source tested:</i> Ethylene Oxide - Dry Bed Scrubber EP1 | | | |
| 84211 | 202000545 | 12-Jun-2020 | Waldron, Sherry | Indeterminate |
| | <i>Source tested:</i> Ethylene Oxide - Scrubber EP4 | | | |

Fees Data

| <u>Fee year</u> | <u>Invoiced amount</u> | <u>Amount paid</u> | <u>Balance</u> | <u>Status</u> |
|-----------------|------------------------|--------------------|----------------|---------------|
| 2019 | \$2,100.00 | \$2,100.00 | \$0 | Paid in Full |
| 2018 | \$1,731.45 | \$1,731.45 | \$0 | Paid in Full |
| 2017 | \$1,700.00 | \$1,700.00 | \$0 | Paid in Full |
| 2016 | \$1,700.00 | \$1,700.00 | \$0 | Paid in Full |
| 2015 | \$1,700.00 | \$1,700.00 | \$0 | Paid in Full |

Five-Year History of Enforcement Actions

| <u>Tracking #</u> | <u>Staff responsible</u> | <u>Date</u> | <u>Type</u> |
|-------------------|--------------------------|-------------|-----------------------------|
| 2439 | Waldron, Sherry | 14-Sep-2020 | Consent Order #EPD-AQC-7039 |
| 2364 | Waldron, Sherry | 7-Jan-2020 | Consent Order #EPD-AQC-7007 |

Waldron, Sherry

From: ewelch@sterilization-services.com
Sent: Thursday, September 24, 2020 2:05 PM
To: Waldron, Sherry
Subject: RE: Records request for submittal by September 23
Attachments: Emissions equipment parts list.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sherry,

Please let me know if there is anything else.

Eric Welch
Plant Manager
Sterilization Services of Georgia
6005 Boat Rock Blvd. SW
Atlanta, GA 30336
office 404-344-8423
fax 404-344-8665
cell 404-973-9645
EWELCH@STERILIZATION-SERVICES.COM

From: Waldron, Sherry <Sherry.Waldron@dnr.ga.gov>
Sent: Thursday, September 17, 2020 3:02 PM
To: Eric Welch (SSG) <ewelch@sterilization-services.com>
Subject: Records request for submittal by September 23
Importance: High

As discussed, the Division is requesting submittal of records prior to an on-site inspection scheduled for your facility. The records are meant to spot-check select records in order to ascertain the facility's compliance with Georgia Air Quality Permit No. 3841-121-0010-S-03-0.

Please submit, both electronically by e-mail to me as well as paper copies to the Division for our files, the following records by Wednesday, September 23, 2020:

- EtO usage for July and August 2020 (P.C.s 7.7, 7.8)
- Weekly scrubber liquor tank liquid level from the months of March 2019 of July 2020 (P.C. 5.4)
- Records of daily 24-hour average oxidation temperature for the catalytic oxidizer for March 2019 and July 2020 (P.C.s 5.2, 7.3, 7.4, and 7.5)
- Records of the most recent two accuracy verifications for the catalytic oxidizer thermocouple (P.C. 5.3)
- Documentation that the accuracy of the catalyst temperature monitor is within $\pm 10^{\circ}\text{F}$ (P.C. 5.2)
- Weekly records of the EtO inlet and outlet sampling of the dry bed reactors, and the calculated destruction efficiency (P.C. 5.5), for the time period of June and July 2020.
- The list of spare parts inventory for control equipment (P.C. 4.2).

- What method does the facility use to schedule routine maintenance? Repairs? (P.C.s 4.1, 4.3)
- Describe how the facility maintains records of startup, shutdown, or malfunction of air pollution control equipment; and periods when continuous monitoring systems or monitoring devices are inoperative, in compliance with P.C. 7.1.

Thank you for your assistance.

Sincerely,

Sherry Waldron
Environmental Engineer
Georgia Environmental Protection Division
Air Protection Branch
404-362-4569

Emissions equipment parts list

Scrubber

Flow Control Valve and Actuator

Recirculation Valve and Actuator

Reactor Tank Selector Valve and Actuator

Heat Exchanger

Spare pumps and motors

Oxidizer

Oxidizer temperature probe

200 watt motor

Belts

Relay module Honeywell

Limit controllers

Dry bed reactors

Motor

Belts

Catalyst

Filters

Waldron, Sherry

From: ewelch@sterilization-services.com
Sent: Wednesday, September 23, 2020 5:17 PM
To: Waldron, Sherry
Cc: JBoLand@Sterilization-Services.com; 'Tammie Brenner'
Subject: RE: Records request for submittal by September 23
Attachments: Oxidizer calibration.pdf; 3225_001.pdf; 2019_001.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sherry,

I apologize for getting this to you so late. I had went on vacation on the 17th and had just read the email this morning. If you need anything else please let me know.

Eric Welch
Plant Manager
Sterilization Services of Georgia
6005 Boat Rock Blvd. SW
Atlanta, GA 30336
office 404-344-8423
fax 404-344-8665
cell 404-973-9645
EWELCH@STERILIZATION-SERVICES.COM

From: Waldron, Sherry <Sherry.Waldron@dnr.ga.gov>
Sent: Thursday, September 17, 2020 3:02 PM
To: Eric Welch (SSG) <ewelch@sterilization-services.com>
Subject: Records request for submittal by September 23
Importance: High

As discussed, the Division is requesting submittal of records prior to an on-site inspection scheduled for your facility. The records are meant to spot-check select records in order to ascertain the facility's compliance with Georgia Air Quality Permit No. 3841-121-0010-S-03-0.

Please submit, both electronically by e-mail to me as well as paper copies to the Division for our files, the following records by Wednesday, September 23, 2020:

- EtO usage for July and August 2020 (P.C.s 7.7, 7.8) **July (7163.3 lbs.) August (10,729.5 lbs.)**
- Weekly scrubber liquor tank liquid level from the months of March 2019 of July 2020 (P.C. 5.4) **Attached.**
- Records of daily 24-hour average oxidation temperature for the catalytic oxidizer for March 2019 and July 2020 (P.C.s 5.2, 7.3, 7.4, and 7.5) **Attached. Same form as daily scrubber tank level.**
- Records of the most recent two accuracy verifications for the catalytic oxidizer thermocouple (P.C. 5.3) **Attached**

- Documentation that the accuracy of the catalyst temperature monitor is within $\pm 10^{\circ}\text{F}$ (P.C. 5.2) **Same as above.**
- Weekly records of the EtO inlet and outlet sampling of the dry bed reactors, and the calculated destruction efficiency (P.C. 5.5), for the time period of June and July 2020. **Attached**
- The list of spare parts inventory for control equipment (P.C. 4.2). **Will send this first thing in the morning.**
- What method does the facility use to schedule routine maintenance? Repairs? (P.C.s 4.1, 4.3) **Maintenance is determined by procedures and frequency required.**
- Describe how the facility maintains records of startup, shutdown, or malfunction of air pollution control equipment; and periods when continuous monitoring systems or monitoring devices are inoperative, in compliance with P.C. 7.1. **Equipment repair procedure and engineering change control procedure.**

Thank you for your assistance.

Sincerely,

Sherry Waldron
Environmental Engineer
Georgia Environmental Protection Division
Air Protection Branch
404-362-4569

Sterilization Services of Georgia
SEMI-ANNUAL OXIDIZER MAINTENANCE INSPECTION AND CALIBRATION

OXIDIZER THERMOCOUPLE CHECK: ACCEPTANCE CRITERIA +/- 2° F

Beta serial # 1678089

Beta calibration due date 10/20

| Oxidizer recorder | As Found (Beta attached to TC) | Deviation | *As Left |
|-------------------|--------------------------------|-----------|----------|
| 288.4 | 288.0 | + 0.4 | 288.4 |
| N/A | N/A | N/A | N/A |
| N/A | N/A | N/A | N/A |

HONEYWELL OXIDIZER INSTRUMENTATION CALIBRATION: ACCEPTANCE CRITERIA +/- 2° F

Beta serial # 1678089

Beta calibration due date 10/20

| Test temperature | 200°F | 250°F | 300°F |
|-------------------------------------|-------|-------|-------|
| Honeywell recorder as found reading | 201.0 | 251.0 | 301.0 |
| Beta reading | 200.0 | 250.0 | 300.0 |
| Deviation | + 1.0 | + 1.0 | + 1.0 |
| *As left reading | 201.0 | 251.0 | 301.0 |

YOKOGAWA INSTRUMENTATION CALIBRATION: ACCEPTANCE CRITERIA +/- 2° F

Beta serial # 1678089

Beta calibration due date 10/20

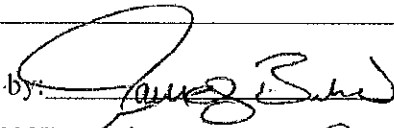
| Test temperature | 200°F | 250°F | 300°F |
|---------------------------|-------|-------|-------|
| Yokogawa as found reading | 200.2 | 250.2 | 300.2 |
| Beta reading | 200.0 | 250.0 | 300.0 |
| Deviation | + 0.2 | + 0.2 | + 0.2 |
| *As left reading | 200.2 | 250.2 | 300.2 |

**If as found reading is within the acceptance criteria the as left reading is not required. As left reading is required when there is an adjustment.*

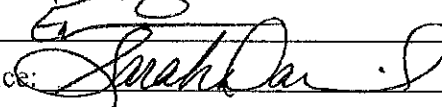
Abnormal Operations: N/A

Comments:

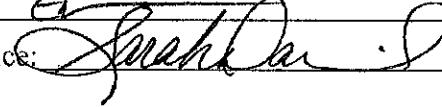
N/A

Performed by: 

Date: 07/01/20

Plant Manager: 

Date: 7-1-20

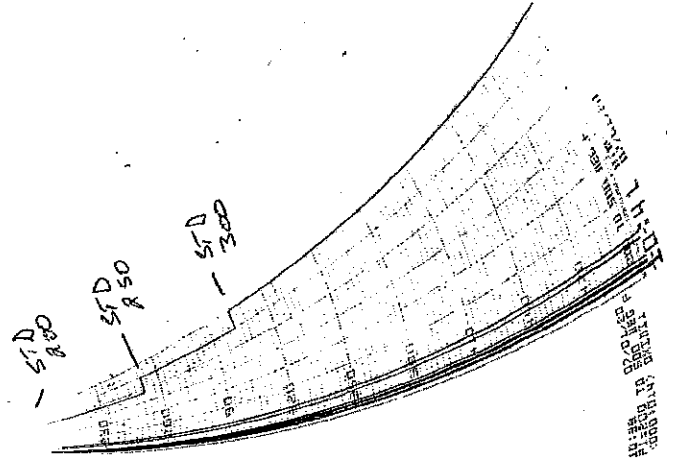
Quality Assurance: 

Date: 7/01/2020

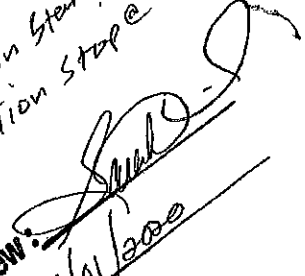
| Concentration | Response | Yokogawa Cal. |
|---------------|----------|---------------|
| 20 | 111.40 | Yokogawa cal. |
| 40 | 228.20 | Yokogawa cal. |
| 60 | 345.00 | Yokogawa cal. |
| 80 | 461.80 | Yokogawa cal. |
| 100 | 578.60 | Yokogawa cal. |

Oxidizer Calibration
7-1-20

TO FIT
HONEYWELL
30756317



Oxidizer
calibration
7-1-20
calibration start @ 10:40
calibration stop @ 11:40

QA Review: 
Date: 7/01/2020

Sterilization Services of Georgia
SEMI-ANNUAL OXIDIZER MAINTENANCE INSPECTION AND CALIBRATION

OXIDIZER THERMOCOUPLE CHECK: ACCEPTANCE CRITERIA +/- 2° F

Beta serial # 1678089

Beta calibration due date 10/20

| Oxidizer recorder | As Found (Beta attached to TC) | Deviation | *As Left |
|-------------------|--------------------------------|-----------|----------|
| 277.2 | 277.0 | + 0.2 | 277.2 |
| N/A | N/A | N/A | N/A |
| N/A | N/A | N/A | N/A |

HONEYWELL OXIDIZER INSTRUMENTATION CALIBRATION: ACCEPTANCE CRITERIA +/- 2° F

Beta serial # 1678089

Beta calibration due date 10/20

| Test temperature | 200°F | 250°F | 300°F |
|-------------------------------------|-------|-------|-------|
| Honeywell recorder as found reading | 201.0 | 251.0 | 301.0 |
| Beta reading | 200.0 | 250.0 | 300.0 |
| Deviation | + 1.0 | + 1.0 | + 1.0 |
| *As left reading | 201.0 | 251.0 | 301.0 |

YOKOGAWA INSTRUMENTATION CALIBRATION: ACCEPTANCE CRITERIA +/- 2° F

Beta serial # 1678089

Beta calibration due date 10/20

| Test temperature | 200°F | 250°F | 300°F |
|---------------------------|-------|-------|-------|
| Yokogawa as found reading | 200.3 | 250.2 | 300.2 |
| Beta reading | 200.0 | 250.0 | 300.0 |
| Deviation | + 0.3 | + 0.2 | + 0.2 |
| *As left reading | 200.3 | 250.2 | 300.2 |

**If as found reading is within the acceptance criteria the as left reading is not required. As left reading is required when there is an adjustment.*

Abnormal Operations: N/A

Comments:

N/A

Performed by: *David J. Stone*

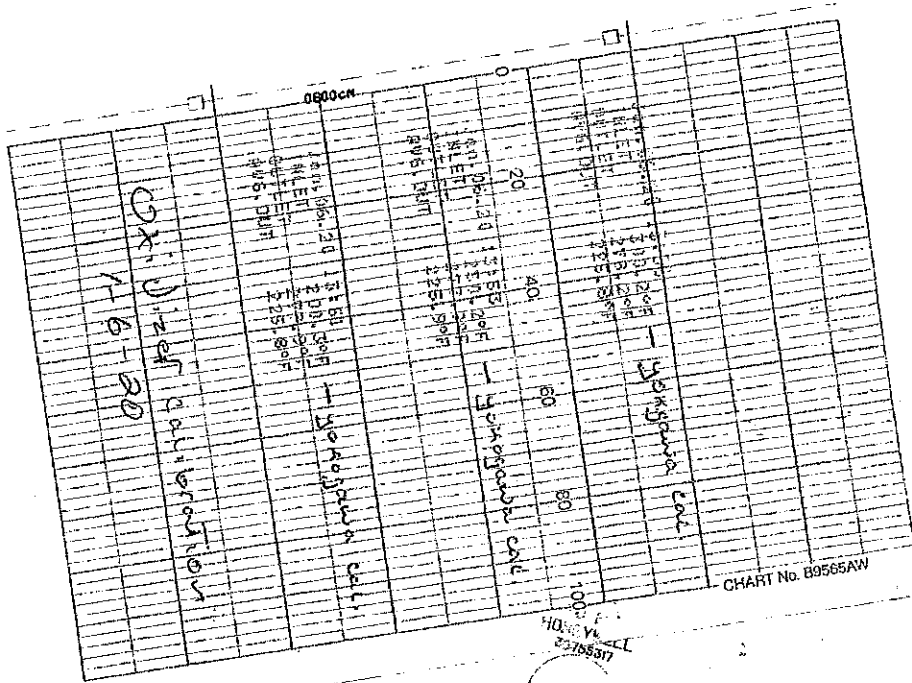
Date: 01/06/20

Plant Manager: *Em*

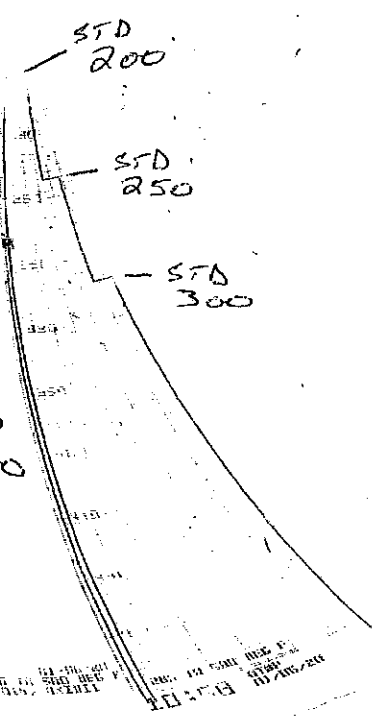
Date: 1-6-20

Quality Assurance: *J. Hill*

Date: 1-6-20



Oxidizer
Calibration
1-6-20
Calibration Start @ 10:50
Calibration End @ 12:00



Sterilization Services of Georgia

Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

1. Follow manufacturer guidelines to prepare analyzer – instructions to be with the analyzer.
2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
4. Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
5. Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
8. Document final completion time of the analyzation of the samples.

| | | | |
|------------------------------------|--------------------------------|--------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| Chamber in use: <u>#13</u> | | %Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal | |
| Before DBR PPM: <u>147.9572</u> | After DBR PPM: <u>0.766</u> | Results: <u>100%</u> | |
| Blower in use: <u>#1</u> | | Sample Complete Time/Date <u>09:55 6-25-20</u> | Final Completion Time/Date <u>11:20 6-25-20</u> |

Are the results (% Removal) less than 99.1%? Yes No

If yes:

- Plant Manager and QA/RA Manager must be notified.

Date notified: n/a Initials: n/a

- Dry Bed Material must be replaced within 15 days. Date Replaced n/a

If no, no further action required.

Comments:

n/a

Inspected by: [Signature] Date: 6-25-20

Plant Manager: [Signature] Date: 6-25-2020

QA Review: [Signature] Date: 6/25/2020

Sterilization Services of Georgia

Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

1. Follow manufacturer guidelines to prepare analyzer – instructions to be with the analyzer.
2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
4. Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
5. Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
8. Document final completion time of the analyzation of the samples.

| | | | |
|------------------------------------|---------------------------------|---------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| Chamber in use: <u># 01</u> | | % Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal | |
| Before DBR PPM: <u>132.1288</u> | After DBR PPM: <u>0.7578</u> | Results: <u>100%</u> | |
| Blower in use: <u># 1</u> | | Sample Complete Time/Date <u>16:05 6-18-20</u> | Final Completion Time/Date <u>17:30 6-18-20</u> |

Are the results (% Removal) less than 99.1%? Yes No

If yes:

- Plant Manager and QA/RA Manager must be notified.

Date notified: n/a Initials: n/a

- Dry Bed Material must be replaced within 15 days. Date Replaced n/a

If no, no further action required.

Comments:

n/a

Inspected by: James (S) [Signature] Date: 6-18-20
 Plant Manager: [Signature] Date: 6-19-20
 QA Review: [Signature] Date: 6/19/2020

Sterilization Services of Georgia

Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

1. Follow manufacturer guidelines to prepare analyzer – instructions to be with the analyzer.
2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
4. Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
5. Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
8. Document final completion time of the analyzation of the samples.

| | | | |
|------------------------------------|----------------------------------|--------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| Chamber in use: <u>01</u> | | %Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal | |
| Before DBR PPM: <u>138.8836</u> | After DBR PPM: <u>-0.7902</u> | Results: <u>100%</u> | |
| Blower in use: <u>#1</u> | | Sample Complete Time/Date <u>13:59 6-11-20</u> | Final Completion Time/Date <u>15:30 6-11-20</u> |

Are the results (% Removal) less than 99.1%? Yes No

If yes:

- Plant Manager and QA/RA Manager must be notified.

Date notified: n/a Initials: n/a

- Dry Bed Material must be replaced within 15 days. Date Replaced n/a

If no, no further action required.

Comments:

n/a

Inspected by: [Signature] Date: 6-11-20
 Plant Manager: [Signature] Date: 6-11-20
 QA Review: [Signature] Date: 6/11/2020

Sterilization Services of Georgia

Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

1. Follow manufacturer guidelines to prepare analyzer -- instructions to be with the analyzer.
2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
4. Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
5. Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
8. Document final completion time of the analyzation of the samples.

| | | | |
|------------------------------------|----------------------------------|--------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|
| Chamber in use: <u>#21</u> | | %Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal | |
| Before DBR PPM: <u>293.6201</u> | After DBR PPM: <u>-0.7422</u> | Results: <u>100 %</u> | |
| Blower in use: <u>#1</u> | | Sample Complete Time/Date <u>09:54 6-3-20</u> | Final Completion Time/Date <u>6-3-20 11:20</u> |

Are the results (% Removal) less than 99.1%? Yes No

If yes:

- Plant Manager and QA/RA Manager must be notified.

Date notified: n/a Initials: n/a

- Dry Bed Material must be replaced within 15 days. Date Replaced n/a

If no, no further action required.

Comments:

n/a

Inspected by: [Signature] Date: 6-3-20

Plant Manager: [Signature] Date: 6-3-20

QA Review: [Signature] Date: 6/03/2020

Sterilization Services of Georgia

Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

1. Follow manufacturer guidelines to prepare analyzer -- instructions to be with the analyzer.
2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
4. Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
5. Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
8. Document final completion time of the analyzation of the samples.

| | | | |
|------------------------------------|----------------------------------|--------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| Chamber in use: <u># 03</u> | | %Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal | |
| Before DBR PPM: <u>101.3814</u> | After DBR PPM: <u>70.9182</u> | Results: <u>100%</u> | |
| Blower in use: <u># 1</u> | | Sample Complete Time/Date <u>09:48 7-31-20</u> | Final Completion Time/Date <u>11:30 7-31-20</u> |

Are the results (% Removal) less than 99.1%? Yes No

If yes:

- Plant Manager and QA/RA Manager must be notified.

Date notified: n/a Initials: n/a

- Dry Bed Material must be replaced within 15 days. Date Replaced n/a

If no, no further action required.

Comments:

n/a

Inspected by: [Signature] Date: 7-31-20

Plant Manager: [Signature] Date: 7-31-20

QA Review: [Signature] Date: 7/31/2020

Sterilization Services of Georgia
Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

1. Follow manufacturer guidelines to prepare analyzer – instructions to be with the analyzer.
2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
4. Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
5. Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
8. Document final completion time of the analyzation of the samples.

| | | | |
|-----------------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| Chamber in use: <u>#02</u> | | %Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal | |
| Before DBR PPM: <u>17.4741</u> | After DBR PPM: <u>0.8265</u> | Results: <u>100%</u> | |
| Blower in use: <u>#1</u> | | Sample Complete Time/Date <u>11:00 7-24-20</u> | Final Completion Time/Date <u>12:30 7-24-20</u> |

Are the results (% Removal) less than 99.1%? Yes No

If yes:

- Plant Manager and QA/RA Manager must be notified.

Date notified: n/a Initials: n/a

- Dry Bed Material must be replaced within 15 days. Date Replaced n/a

If no, no further action required.

Comments:

n/a

Inspected by: [Signature] Date: 7-24-20
 Plant Manager: [Signature] Date: 7-24-20
 QA Review: [Signature] Date: 7/27/2020

Sterilization Services of Georgia

Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

1. Follow manufacturer guidelines to prepare analyzer – instructions to be with the analyzer.
2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
4. Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
5. Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
8. Document final completion time of the analyzation of the samples.

| | | | |
|-------------------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| Chamber in use: <u>A03</u> | | %Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal | |
| Before DBR PPM: <u>248.81006</u> | After DBR PPM: <u>0.7862</u> | Results: <u>100%</u> | |
| Blower in use: <u>A1</u> | | Sample Complete Time/Date <u>15:23 7-17-20</u> | Final Completion Time/Date <u>17:00 7-17-20</u> |

Are the results (% Removal) less than 99.1%? Yes No

If yes:

- Plant Manager and QA/RA Manager must be notified.

Date notified: n/a Initials: n/a

- Dry Bed Material must be replaced within 15 days. Date Replaced n/a

If no, no further action required.

Comments:

n/a

Inspected by: [Signature] Date: 7-17-20

Plant Manager: [Signature] Date: 7-21-20

QA Review: [Signature] Date: 7/21/2020

Sterilization Services of Georgia

Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

1. Follow manufacturer guidelines to prepare analyzer – instructions to be with the analyzer.
2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
4. Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
5. Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
8. Document final completion time of the analyzation of the samples.

| | | | |
|-----------------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| Chamber in use: <u>#02</u> | | %Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal | |
| Before DBR PPM: <u>35.6294</u> | After DBR PPM: <u>0.8057</u> | Results: <u>100%</u> | |
| Blower in use: <u>#1</u> | | Sample Complete Time/Date <u>15:55 7-9-20</u> | Final Completion Time/Date <u>17:20 7-9-20</u> |

Are the results (% Removal) less than 99.1%? Yes No

If yes:

- Plant Manager and QA/RA Manager must be notified.

Date notified: n/a Initials: n/a

- Dry Bed Material must be replaced within 15 days. Date Replaced n/a

If no, no further action required.

Comments:

n/a

Inspected by: [Signature] Date: 7-9-20

Plant Manager: [Signature] Date: 7-13-20

QA Review: [Signature] Date: 7/14/2020

Sterilization Services of Georgia
Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

1. Follow manufacturer guidelines to prepare analyzer – instructions to be with the analyzer.
2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
4. Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
5. Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
8. Document final completion time of the analyzation of the samples.

| | | | |
|------------------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| Chamber in use: <u>#01</u> | | %Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal | |
| Before DBR PPM: <u>145.7677</u> | After DBR PPM: <u>0.7505</u> | Results: <u>100%</u> | |
| Blower in use: <u>F1</u> | | Sample Complete Time/Date <u>10:00 7-2-20</u> | Final Completion Time/Date <u>11:40 7-2-20</u> |

Are the results (% Removal) less than 99.1%? Yes No

If yes:

- Plant Manager and QA/RA Manager must be notified.

Date notified: n/a Initials: n/a

- Dry Bed Material must be replaced within 15 days. Date Replaced n/a

If no, no further action required.

Comments:

n/a

Inspected by: [Signature] Date: 7-2-20

Plant Manager: [Signature] Date: 7-13-20

QA Review: [Signature] Date: 7/14/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 7 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>82</u> | <u>58</u> | <u>104</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3827</u> | <u>1643</u> | <u>2947</u> | <u>84.7</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-31-20

Plant Manager: [Signature] Date: 7-31-20

QA Review: [Signature] Date: 7/31/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>70</u> Gallons | <u>115</u> Gallons | <u>66</u> Gallons | <u>n/a</u> |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3267</u> | <u>3258</u> | <u>1870</u> | <u>8395</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-30-20

Plant Manager: [Signature] Date: 7-31-20

QA Review: [Signature] Date: 7/31/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>7.0</u> | <u>60</u> | <u>60</u> | <u>75</u> | <u>67</u> | <u>104</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3500</u> | <u>1898</u> | <u>2947</u> | <u>8345</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-29-20

Plant Manager: [Signature] Date: 7-29-20

QA Review: [Signature] Date: 7/29/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .7 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | inches | inches | inches | |
| 70 | 60 | 60 | 76 | 65 | 105 | n/a |
| | | | Gallons | Gallons | Gallons | |
| n/a | n/a | n/a | 3547 | 1842 | 2975 | 8364 |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-28-20

Plant Manager: [Signature] Date: 7-28-20

QA Review: [Signature] Date: 7/29/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 7 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|--------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>93</u> | <u>36</u> | <u>105</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4340</u> | <u>1020</u> | <u>2975</u> | <u>8335</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-27-20

Plant Manager: [Signature] Date: 7-28-20

QA Review: [Signature] Date: 7/29/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .7 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|--------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>1.00</u> | <u>2.3</u> | <u>1.05</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4667</u> | <u>658</u> | <u>2975</u> | <u>8294</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-24-20

Plant Manager: [Signature] Date: 7-24-20

QA Review: [Signature] Date: 7/27/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>104</u> | <u>103</u> | <u>18</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4853</u> | <u>2918</u> | <u>510</u> | <u>8281</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-23-20

Plant Manager: [Signature] Date: 7-24-20

QA Review: [Signature] Date: 7/27/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 0.7 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>104</u> | <u>21</u> | <u>98</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4853</u> | <u>595</u> | <u>2777</u> | <u>8225</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature]

Date: 7-22-20

Plant Manager: [Signature]

Date: 7-22-20

QA Review: [Signature]

Date: 7/22/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 7 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>79</u> | <u>82</u> | <u>78</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3687</u> | <u>2323</u> | <u>2210</u> | <u>8220</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-21-20

Plant Manager: [Signature] Date: 7-21-20

QA Review: [Signature] Date: 7/21/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .7 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | inches | inches | inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>87</u> | <u>42</u> | <u>105</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4060</u> | <u>1190</u> | <u>2975</u> | <u>8225</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

_____ n/a

Inspected by: [Signature] Date: 7-20-20

Plant Manager: [Signature] Date: 7-21-20

QA Review: [Signature] Date: 7/21/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 7 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|--------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>93</u> Gallons | <u>114</u> Gallons | <u>22</u> Gallons | <u>n/a</u> |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4340</u> | <u>3230</u> | <u>623</u> | <u>8193</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-17-20

Plant Manager: [Signature] Date: 7-17-20

QA Review: [Signature] Date: 7/17/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 7 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | inches | inches | inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>68</u> | <u>116</u> | <u>61</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3,73</u> | <u>3,887</u> | <u>1,728</u> | <u>8,188</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on; is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-16-20

Plant Manager: [Signature] Date: 7-16-20

QA Review: _____ Date: _____

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 7 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No
 If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>70</u> | <u>70</u> | <u>103</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3267</u> | <u>1983</u> | <u>2918</u> | <u>8168</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature]

Date: 7-15-20

Plant Manager: [Signature]

Date: 7-16-20

QA Review: [Signature]

Date: 7/16/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | inches | inches | inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>70</u> | <u>116</u> | <u>57</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3267</u> | <u>3287</u> | <u>1615</u> | <u>8169</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-14-20

Plant Manager: [Signature] Date: 7-16-20

QA Review: [Signature] Date: 7/16/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/a _____

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| 70 | 60 | 60 | 84 | 86 | 62 | n/a |
| | | | Gallons | Gallons | Gallons | |
| n/a | n/a | n/a | 3920 | 2437 | 1757 | 8114 |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

_____ n/a _____

Inspected by: [Signature] Date: 7-13-20

Plant Manager: [Signature] Date: 7-13-20

QA Review: [Signature] Date: 7/14/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>89</u> | <u>116</u> | <u>25</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4153</u> | <u>3287</u> | <u>700</u> | <u>8140</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-10-20

Plant Manager: [Signature] Date: 7-13-20

QA Review: [Signature] Date: 7/14/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>88</u> | <u>37</u> | <u>105</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4107</u> | <u>1048</u> | <u>2975</u> | <u>8130</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-9-20

Plant Manager: [Signature] Date: 7-13-20

QA Review: [Signature] Date: 7/14/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>86</u> | <u>59</u> | <u>86</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4013</u> | <u>1672</u> | <u>2437</u> | <u>8122</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-8-20

Plant Manager: [Signature] Date: 7-13-20

QA Review: [Signature] Date: 7/14/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| 70 | 60 | 60 | 91 | 30 | 106 | n/a |
| | | | Gallons | Gallons | Gallons | |
| n/a | n/a | n/a | 4247 | 850 | 3003 | 8100 |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments: n/a

Inspected by: James Bred Date: 7-7-20
 Plant Manager: [Signature] Date: 7-13-20
 QA Review: Sarah Da. J. Date: 7/14/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 0.8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>94</u> | <u>24</u> | <u>106</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4387</u> | <u>680</u> | <u>3003</u> | <u>8070</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-6-20

Plant Manager: [Signature] Date: 7-8-20

QA Review: [Signature] Date: 7/08/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 0.8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>69</u> | <u>83</u> | <u>82</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3220</u> | <u>2352</u> | <u>2323</u> | <u>7895</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature] Date: 7-2-20

Plant Manager: [Signature] Date: 7-8-20

QA Review: [Signature] Date: 7/28/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>70</u> | <u>60</u> | <u>60</u> | <u>67</u> | <u>117</u> | <u>50</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3187</u> | <u>3315</u> | <u>1417</u> | <u>7859</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 269 °F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Comments:

n/a

Inspected by: [Signature]

Date: 7-1-20

Plant Manager: [Signature]

Date: 7-1-20

QA Review: [Signature]

Date: 7/02/2020

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>69</u> | <u>60</u> | <u>60</u> | <u>81</u> | <u>61</u> | <u>104</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3780</u> | <u>1728</u> | <u>2947</u> | <u>8455</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Inspected by: [Signature] Date: 3-4-19

Plant Manager: ERIC WELCH Date: 3-4-19

QA Review: [Signature] Date: 3-4-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>69</u> | <u>60</u> | <u>60</u> | <u>102</u> | <u>111</u> | <u>19</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4760</u> | <u>3145</u> | <u>538</u> | <u>8443</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Inspected by: [Signature] Date: 3-5-19

Plant Manager: [Signature] Date: ~~7-5-18~~ 3-5-19

QA Review: [Signature] Date: 3-5-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>68</u> | <u>60</u> | <u>60</u> | <u>73</u> | <u>112</u> | <u>66</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3907</u> | <u>3173</u> | <u>1870</u> | <u>8450</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Inspected by: [Signature] Date: 3-6-19

Plant Manager: [Signature] Date: 3-6-19

QA Review: [Signature] Date: 3-6-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/a _____

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>69</u> | <u>60</u> | <u>60</u> | <u>85</u> | <u>53</u> | <u>106</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3967</u> | <u>1502</u> | <u>3003</u> | <u>8472</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: _____ n/a _____

Inspected by: [Signature] Date: 3-7-19

Plant Manager: Eric Welch Date: 3-7-19

QA Review: [Signature] Date: 3-7-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>68</u> | <u>60</u> | <u>60</u> | <u>104</u> | <u>109</u> | <u>19</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4853</u> | <u>3088</u> | <u>538</u> | <u>8479</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Inspected by: [Signature] Date: 3-8-19

Plant Manager: [Signature] Date: 3-8-19

QA Review: [Signature] Date: 3-8-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 0.8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>69</u> | <u>60</u> | <u>60</u> | <u>72</u> | <u>112</u> | <u>69</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3360</u> | <u>3,73</u> | <u>1955</u> | <u>8488</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No
 If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Inspected by: James B... Date: 3-11-19
 Plant Manager: Eric Welch Date: 3-11-19
 QA Review: Jdell Date: 3-11-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|--------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>69</u> | <u>60</u> | <u>60</u> | <u>96</u> | <u>37</u> | <u>105</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4480</u> | <u>1046</u> | <u>2975</u> | <u>8501</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Inspected by: [Signature] Date: 3-12-19
 Plant Manager: [Signature] Date: 3-12-19
 QA Review: [Signature] Date: 3-12-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/a _____

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>68</u> | <u>60</u> | <u>60</u> | <u>96</u> | <u>61</u> | <u>81</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4480</u> | <u>1728</u> | <u>2295</u> | <u>8503</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Inspected by: [Signature] Date: 3-13-19

Plant Manager: [Signature] Date: 3-13-19

QA Review: [Signature] Date: 3-13-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>69</u> | <u>60</u> | <u>60</u> | <u>80</u> | <u>111</u> | <u>58</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3733</u> | <u>3145</u> | <u>1643</u> | <u>8521</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: _____ n/a

Inspected by: [Signature] Date: 3-14-19

Plant Manager: [Signature] Date: 3-14-19

QA Review: [Signature] Date: 3-14-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/A

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>68</u> | <u>60</u> | <u>60</u> | <u>108</u> | <u>21</u> | <u>102</u> | <u>n/A</u> |
| <u>n/A</u> | <u>n/A</u> | <u>n/A</u> | Gallons | Gallons | Gallons | |
| | | | <u>5040</u> | <u>595</u> | <u>2890</u> | <u>8525</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/A Initials: n/A

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: _____ n/A

Inspected by: [Signature] Date: 3-15-19

Plant Manager: [Signature] Date: 3-15-19

QA Review: [Signature] Date: 3-15-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80°F) | Storage Temp. (60-75°F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|--------------------------|----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>68</u> | <u>60</u> | <u>60</u> | <u>96</u> | <u>40</u> | <u>104</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4480</u> | <u>1133</u> | <u>2947</u> | <u>8560</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No
 If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Inspected by: [Signature] Date: 3-18-19
 Plant Manager: [Signature] Date: 3-18-19
 QA Review: [Signature] Date: 3-18-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>69</u> | <u>60</u> | <u>60</u> | <u>97</u> | <u>61</u> | <u>81</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>4527</u> | <u>1728</u> | <u>2295</u> | <u>8550</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No
 If yes, Plant Manager and QA/RA Manager must be notified. Date notified: 3-19-19 Initials: ES

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Inspected by: [Signature] Date: 3-19-19

Plant Manager: [Signature] Date: 3-19-19

QA Review: [Signature] Date: 3-19-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 0.6 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/A

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>69</u> | <u>60</u> | <u>60</u> | <u>69</u> | <u>103</u> | <u>19</u> | <u>n/A</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/A</u> | <u>n/A</u> | <u>n/A</u> | <u>3220</u> | <u>2918</u> | <u>538</u> | <u>6676</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No
 If yes, Plant Manager and QA/RA Manager must be notified. Date notified: 3-19-19 Initials: CTB

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/A

Inspected by: [Signature] Date: 3-20-19

Plant Manager: [Signature] Date: 3-21-19

QA Review: [Signature] Date: 3-21-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 6 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80°F) | Storage Temp. (60-75°F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|--------------------------|----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>68</u> | <u>60</u> | <u>60</u> | <u>68</u> | <u>100</u> | <u>24</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3173</u> | <u>2833</u> | <u>680</u> | <u>6686</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No
 If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Inspected by: [Signature] Date: 3-21-19
 Plant Manager: [Signature] Date: 3-21-19
 QA Review: [Signature] Date: 3-21-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .7 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>68</u> | <u>60</u> | <u>60</u> | <u>43</u> | <u>54</u> | <u>110</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>8007</u> | <u>1530</u> | <u>3117</u> | <u>6654</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: _____ n/a

Inspected by: [Signature] Date: 3-22-19

Plant Manager: Eric Wald Date: 3-22-19

QA Review: [Signature] Date: 3-22-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .6 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/a _____

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>67</u> | <u>60</u> | <u>60</u> | <u>72</u> | <u>21</u> | <u>101</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>3360</u> | <u>595</u> | <u>2862</u> | <u>6817</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: _____ n/a _____

Inspected by: [Signature] Date: 3-25-19

Plant Manager: [Signature] Date: 3-25-19

QA Review: [Signature] Date: 3-25-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .6 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>69</u> | <u>60</u> | <u>60</u> | <u>50</u> | <u>120</u> | <u>38</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>2333</u> | <u>3400</u> | <u>1077</u> | <u>6810</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Inspected by: Cheryl [Signature] Date: 3-26-19
 Plant Manager: Eric Welch Date: 3-26-19
 QA Review: Jdell Date: 3-26-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .6 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>69</u> | <u>60</u> | <u>60</u> | <u>48</u> | <u>51</u> | <u>110</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>0240</u> | <u>1445</u> | <u>3117</u> | <u>6802</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Inspected by: James [Signature] Date: 3-27-19

Plant Manager: Eric Welch Date: 3-22-19

QA Review: Jdell Date: 3-27-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: 0.8 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp. (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|---------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>68</u> | <u>60</u> | <u>60</u> | <u>33</u> | <u>78</u> | <u>106</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>1540</u> | <u>2210</u> | <u>3003</u> | <u>6753</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No

If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.

Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Inspected by: [Signature] Date: 3-28-19

Plant Manager: [Signature] Date: 3-28-19

QA Review: [Signature] Date: 3-28-19

Sterilization Services of Georgia
Daily Inspection Compliance Level Checks

LIQUID SCRUBBER INSPECTION

Scrubber pH: .6 (Should be less than 1.0, if greater than 1.0 add sulfuric acid and notify Plant Manager)

Control panel lamp test performed. Yes No

If any bulbs are out, replace bulbs. Are all alarm lights working properly? Yes No N/A

Control panel alarm conditions (list alarms and actions taken for each):

_____ n/a

COMPLIANCE LEVEL CHECKS

| Flow Rate (70 ± 5 gpm) from Chemrox control panel | Tower Temp (60-80 °F) | Storage Temp. (60-75 °F) | Storage Tank Level | Reactor Tank #1 Level | Reactor Tank #2 Level | MOV (9,200) Alert Level 8,500 Action Level 8,900 |
|---------------------------------------------------------------|--------------------------|-----------------------------|-----------------------|--------------------------|--------------------------|--------------------------------------------------------|
| | | | Inches | Inches | Inches | |
| <u>69</u> | <u>60</u> | <u>60</u> | <u>49</u> | <u>53</u> | <u>108</u> | <u>n/a</u> |
| | | | Gallons | Gallons | Gallons | |
| <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>2287</u> | <u>1502</u> | <u>3060</u> | <u>6849</u> |

Scrubber recharge necessary (completed recharge form to be attached) Yes No
 If yes, Plant Manager and QA/RA Manager must be notified. Date notified: n/a Initials: n/a

OXIDIZER INSPECTION

The oxidizer may be turned on or off, depending on production needs.
 Has the oxidizer been turned off since the last daily inspection? Yes No

For the periods of time that the oxidizer is turned on: is the temperature above 240°F? Yes No

Is there sufficient paper on both recorders? Yes No

Abnormal conditions: n/a

Inspected by: [Signature] Date: 3-29-19
 Plant Manager: Eric Welch Date: 3-29-19
 QA Review: [Signature] Date: 3-29-19

Waldron, Sherry

From: ewelch@sterilization-services.com
Sent: Wednesday, September 23, 2020 5:17 PM
To: Waldron, Sherry
Cc: JBoLand@Sterilization-Services.com; 'Tammie Brenner'
Subject: RE: Records request for submittal by September 23
Attachments: Oxidizer calibration.pdf; 3225_001.pdf; 2019_001.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sherry,

I apologize for getting this to you so late. I had went on vacation on the 17th and had just read the email this morning. If you need anything else please let me know.

Eric Welch
Plant Manager
Sterilization Services of Georgia
6005 Boat Rock Blvd. SW
Atlanta, GA 30336
office 404-344-8423
fax 404-344-8665
cell 404-973-9645
EWELCH@STERILIZATION-SERVICES.COM

From: Waldron, Sherry <Sherry.Waldron@dnr.ga.gov>
Sent: Thursday, September 17, 2020 3:02 PM
To: Eric Welch (SSG) <ewelch@sterilization-services.com>
Subject: Records request for submittal by September 23
Importance: High

As discussed, the Division is requesting submittal of records prior to an on-site inspection scheduled for your facility. The records are meant to spot-check select records in order to ascertain the facility's compliance with Georgia Air Quality Permit No. 3841-121-0010-S-03-0.

Please submit, both electronically by e-mail to me as well as paper copies to the Division for our files, the following records by Wednesday, September 23, 2020:

- EtO usage for July and August 2020 (P.C.s 7.7, 7.8) **July (7163.3 lbs.) August (10,729.5 lbs.)**
- Weekly scrubber liquor tank liquid level from the months of March 2019 of July 2020 (P.C. 5.4) **Attached.**
- Records of daily 24-hour average oxidation temperature for the catalytic oxidizer for March 2019 and July 2020 (P.C.s 5.2, 7.3, 7.4, and 7.5) **Attached. Same form as daily scrubber tank level.**
- Records of the most recent two accuracy verifications for the catalytic oxidizer thermocouple (P.C. 5.3) **Attached**

- Documentation that the accuracy of the catalyst temperature monitor is within $\pm 10^{\circ}\text{F}$ (P.C. 5.2) **Same as above.**
- Weekly records of the EtO inlet and outlet sampling of the dry bed reactors, and the calculated destruction efficiency (P.C. 5.5), for the time period of June and July 2020. **Attached**
- The list of spare parts inventory for control equipment (P.C. 4.2). **Will send this first thing in the morning.**
- What method does the facility use to schedule routine maintenance? Repairs? (P.C.s 4.1, 4.3) **Maintenance is determined by procedures and frequency required.**
- Describe how the facility maintains records of startup, shutdown, or malfunction of air pollution control equipment; and periods when continuous monitoring systems or monitoring devices are inoperative, in compliance with P.C. 7.1. **Equipment repair procedure and engineering change control procedure.**

Thank you for your assistance.

Sincerely,

Sherry Waldron
Environmental Engineer
Georgia Environmental Protection Division
Air Protection Branch
404-362-4569