



**Cal/EPA**

California  
Environmental  
Protection  
Agency



**Air Resources Board**

P.O. Box 2815  
2020 L Street  
Sacramento, CA  
95812-2815

[www.arb.ca.gov](http://www.arb.ca.gov)



Pete Wilson  
Governor

Peter M. Rooney  
Secretary for  
Environmental  
Protection

February 3, 1998

Dear Sir or Madam:

This is to inform you that the Air Resources Board (ARB) staff will be conducting public workshops to discuss changes we are proposing to the Airborne Toxic Control Measure for Ethylene Oxide Sterilizers and Aerators. The workshop is an informal open meeting that any interested party may attend. At the workshop, we will make a short presentation about the control measure and the proposed amendments, answer questions and take comments about the proposal, and discuss any suggestions you have for changes to the proposal.

The workshop is scheduled for the following date, time, and location:

**Date:** February 24, 1998  
**Time:** 1:00 p.m. - 3:00 p.m.  
**Location:** South Coast Air Quality Management District  
Room CC-3  
21865 Copley Drive  
Diamond Bar, California

This facility is accessible to persons with disabilities. If accommodation is needed, please contact Ms. Lisa Williams at (916) 323-0440 or TDD (916) 324-9531 (or (800) 700-8326 outside the Sacramento area), by February 17, 1998.

### Background

In May 1990, the ARB approved a control measure for ethylene oxide (EtO) sterilizers and aerators. It requires operators of EtO sterilization or fumigation processes to reduce the emissions of EtO, to verify the reduction by testing, and to keep certain records to show that the requirements have been met. The air pollution control and air quality management districts (districts) in the State have implemented and enforced the control measure's requirements. Each district has adopted a district rule based on the statewide control measure, and has worked with the operators of affected facilities to develop permit conditions to satisfy the requirements of the rule.

Sir or Madam  
February 3, 1998  
Page 2

### Why Amend the Control Measure?

We are proposing amendments to the statewide control measure for two reasons--to clarify the requirements for EtO reclamation control technologies, and to incorporate and simplify the federal requirements for large commercial EtO sterilizers.

Subsequent to the adoption of the statewide control measure, control systems using reclamation technology were installed at sources in California. The ARB staff, districts, and industry worked together and developed emission testing and permitting criteria for this new technology which are consistent with the control measure requirements. We are proposing to incorporate these current practices and related changes into the statewide control measure.

In addition, the United States Environmental Protection Agency (U.S. EPA) promulgated a National Emission Standards for Hazardous Air Pollutants for Ethylene Oxide Commercial Sterilization and Fumigation Operations (Sterilizer NESHAP). Rather than having two regulations for commercial facilities, we are proposing to amend the statewide control measure to provide a single regulation that will satisfy both the existing State and federal requirements.

Based on our discussions with the U.S. EPA, it appears that the U.S. EPA will require a number of the federal NESHAP requirements be added to the State regulation before they will approve it as equivalent to the federal NESHAP. These additional requirements are generally related to work practice standards, parameter monitoring, recordkeeping, and reporting. For most of these requirements, the emission benefits cannot be determined. In addition, we generally believe these federal requirements will not substantially improve the current State regulation. We would appreciate your comments on the appropriateness of including these additional federal requirements in the State regulation.

As part of this process, we are also conducting a "sunset review" of this regulation as required by the Governor's Executive Order W-144-97. Under this order, we are to conduct a review of the continued necessity of this regulation, and determine if the regulation needs to be retained, modified, or repealed. We are interested in any comments you have on this issue.

Sir or Madam

February 3, 1998  
Page 3

How to Offer Comments

A draft copy of the amended control measure is enclosed for your review. We welcome your comments or questions. There is no need to notify us regarding your plans to attend the workshop. If you cannot attend the workshop, but would like to provide comments, you may contact Mr. Cliff Popejoy, Manager, Process Evaluation Section, at (916) 322-8521, or send written comments to the following address:

Mr. Cliff Popejoy, Manager  
Process Evaluation Section  
Stationary Source Division  
Air Resources Board  
P. O. Box 2815  
Sacramento, California 95812-2815

Thank you for your attention to this matter. We appreciate your comments and look forward to working with you.

Sincerely,

Robert D. Fletcher, Chief  
Emissions Assessment Branch

Enclosure

cc: Mr. Cliff Popejoy, Manager  
Process Evaluation Section  
Emissions Assessment Branch  
Stationary Source Division

Sir or Madam  
February 3, 1998  
Page 4

bcc: Mike Scheible, EO  
Allan Hirsch, CO  
Bill Lockett, CO  
Kathleen Mead, CO  
Diane Johnston, OLA  
Peter Venturini, SSD  
Don Ames, SSD  
Bob Fletcher, SSD  
Ray Menebroker, SSD  
Dan Donohoue, SSD  
Cliff Popejoy, SSD  
Lisa Jennings, SSD  
Ron Walter, SSD  
Juliana Reilly, SSD  
Stephanie Trenck, CD  
Gary Hunter, CD  
Henry Jordan, CD  
George Lew, MLD  
Cindy Castronovo, MLD  
Kevin Mongar, MLD