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# Willowbrook

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Willowbrook, IL 60527-5549

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January 15, 2019

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**Village Clerk**

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**Director of Finance**

Carrie Dittman

Ms. Kathleen Hoffman, SVP, EH&S and Technical Services  
Sterigenics Incorporated  
2015 Spring Road, Suite 650  
Oakbrook, IL 60523

Dear Ms. Hoffman:

Thank you for the recent opportunity to tour your operations and to learn more about the business that is conducted by Sterigenics. As the Mayor of Willowbrook, I am extremely concerned with the level of fear our residents feel with respect to your operations and their lack of trust of the information they are receiving regarding the impact your operations may be having on their health and the environment.

I had previously written to you on September 4, 2018 requesting information in the spirit of cooperation and transparency. Although you did respond with some information, and I thank you for that, my full request has remained unanswered and I therefore request again that Sterigenics provide me with the following information:

1. A fulsome description of all actions taken by the company to reduce ethylene oxide (EtO) emissions at both facilities operated in Willowbrook, Illinois. This description should also include any work the company has done to review alternative technologies to replace the EtO-based sterilization services performed at Willowbrook facilities and the methods taken to increase the capture and control of EtO emissions.
2. A chart presenting historical air emissions of EtO from the Willowbrook facilities. The company should endeavor to go back to the first year of operation to present. The Village would like to see both allowable and actual EtO emissions. Please express this information in yearly emissions and in pounds.
3. Confirm that the Toxic Release Inventory (TRI) data on EtO air emissions as depicted in Figure 1 of the ATSDR's report accurately reflects *actual* emissions and operations. Please also provide any TRI data going back prior to the calendar year 1995.
4. A description of all air emission monitoring and testing performed at the facilities for EtO discharged to the atmosphere from the facility, whether through the stack or otherwise. Please also include a description of all monitoring that is done to ensure the protection of workers present inside the facility. Lastly, please include a description of all systems used to detect emergency or unauthorized releases of EtO into the environment.



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5. A copy of the company's emergency response plan.
6. Provide an explanation of the proposed sale of the Willowbrook facilities and all non-confidential information you can share on timing and implications.
7. Describe to the Village the community relations and outreach the company has planned for the Village of Willowbrook and its residents.

Since the time of my first request, we have learned more about the facilities and air quality. Both US EPA and Village have performed and continue to perform ambient air testing and the Village has also performed indoor testing. That testing, combined with what we have learned over the last several months, has led us to additional questions and information needs. Again, in the spirit of cooperation and transparency, please provide me with the following information relating to the operations of each of the facilities in Willowbrook:

1. Is Sterigenics required to have a LDAR (Leak Detection and Repair) program? If so, provide your company's procedures for this program.
2. Provide any documents or records of indoor air monitoring (Ethylene Oxide concentrations) from both Sterigenics facilities taken and recorded during calendar years 2017 - 2018.
3. Provide any documents or records describing the daily usage (pounds per day used) of ethylene oxide, daily production rate of ethylene glycol, and daily operation records of control equipment, including the scrubber, for calendar years 2017 through the present;
4. Describe Sterigenics maintenance policies and procedures for the emissions control systems and equipment (acid scrubbers and dry reactors) at each facility. Please include any maintenance records for the emissions control equipment, including purchased acid and dry reactor materials, for calendar years 2017 - 2018.
5. Provide any documents or records showing the waste acid and dry reactor spent material disposed of during the calendar years 2017 - 2018.
6. Provide any documents or production records for July 2018 through present that indicate how many chambers are in operation during each day, how many chambers are in operation during the same time, how many chambers are venting to the acid

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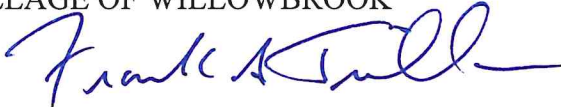
scrubber (Building 1) and how many chambers and aeration rooms are venting to the acid scrubber and dry reactors (Building 1 and Building 2). If there are any legal or enforceable limitations on how the chambers are operated, please describe those limits and how they are enforceable.

7. Provide any information indicating the nature of facility operations (each facility on each day) since EPA ambient air testing began in October, 2018.
8. Has Sterigenics considered performing fenceline testing or other testing to determine whether building downdraft is influencing sampling results at the closest EPA monitored locations?
9. Appendix A of the US DHS Chemical Facility Anti-Terrorism Standards (CFATS), found in 6 CFR Part 27, lists all Chemicals of Interest (COI) to the US DHS along with their respective Screening Threshold Quantities (STQ), which are categorized under three (3) main surety issues: Release, Theft or Diversion, and Sabotage. The Chemical ethylene oxide is listed as having a STQ of 10,000 pounds. Has Sterigenics submitted a "Top-Screen" to the US DHS and if so, please provide a copy.

The Village is incurring considerable expense to perform its own monitoring to respond to resident concerns. I ask that Sterigenics also be responsive to those concerns by cooperating fully with our information needs. I also believe that time is of the essence for Sterigenics to perform comprehensive stack tests at both facilities under "worst case" operating conditions. I ask that your company commit to performing those stack tests immediately.

Sincerely,

VILLAGE OF WILLOWBROOK



Frank Trilla

Mayor

cc: The Honorable Senator John Curran  
The Honorable Representative James Durkin  
Ms. Elizabeth Wallace, Illinois Attorney General's Office