

**Questions for EPA**  
**September 23 Virtual Public Hearing on Ethylene Oxide Emissions**

**Fenceline Monitoring and Emission Testing**

1. It is positive that there is a plan for fenceline monitoring near these sources – and please do not delay action on the pollution while awaiting these results. When will the monitoring start? When will the results be made public online? Will EPA hold another meeting to discuss the results after they are posted?
2. Will EPA continue the fenceline monitoring beyond this pilot period to give more of a picture of the ongoing air quality?
3. Will EPA require emission testing at these facilities to use in enforcement and rules?

**Health Risks**

1. EPA Region 6 has posted online a risk assessment document it used to find results for chemical plants in Texas and Louisiana. Will EPA post online the health risk assessment used to create the risk numbers shared today?
2. Does the health risk assessment account for the greater risk from exposure in utero, or are the numbers presented an underestimate of the health risk because this is not considered?
3. Does the health risk assessment account for socioeconomic vulnerability in our community and environmental injustice in exposure, or is this not considered?
4. Did EPA assess the risk based on the emissions the source is allowed to release or only based on the estimated risk from reported emissions?
5. Did EPA assess the risk from all of the released pollutants to consider the aggregate and cumulative impacts from these facilities, or only ethylene oxide?
6. Will EPA assess the other risks, including the non-cancer risk like an extreme acute release, as we have seen happen from these facilities in the past?
7. When will EPA release an update to the 2014 National Air Toxics Assessment that first identified this problem and how will the public see this information?
8. Has the effect of a temperature inversion (which can cause air pollutants to become trapped lower to the ground) been accounted for in the modeling for the cancer risk results?
9. What is the radius of impact that EPA has evaluated for downwind health risks from this pollution?

**EPA action:**

**Clean Air Rules**

1. When will EPA take public comment on stronger clean air rules that apply to these facilities – including the big 3 for ethylene oxide – Miscellaneous Organic Chemical manufacturing national emission standards (MON), Synthetic Organic Chemical/Hazardous Organic (HON), and Polyether Polyols Production (PEPO)?
2. I'm concerned about the various ways these rules allow these facilities to pollute uncontrollably during startup, shutdown, and malfunction periods (SSM) and for the MON facilities during malfunctions known as “force majeure events” like extreme

weather or storms. Will EPA commit to remove all of the illegal exemptions that these facilities can currently use to avoid reducing their emissions, so the clean air standards will apply every day, at all times, to protect our community?

3. What changes at the facility or pollution control methods would reduce the emissions of ethylene oxide from these facilities, and how can we find out more about these options?
4. I want to see EPA require the maximum achievable degree of pollution reduction in these rules, and I want to know that EPA is satisfying the clean air requirement not just to do the bare minimum, but to provide an ample margin of safety to protect public health from this pollution. What is EPA looking into to protect us?
5. EPA's cancer risk benchmark of 100-in-1 million is too high for a given source, when we are exposed to multiple air toxics sources causing severe risks in our communities. Will EPA recognize that our communities are facing severe cumulative impacts and risks due to our exposure to multiple high-risk chemical plants releasing ethylene oxide – and will EPA act to protect us from all of these facilities and cumulative risks and impacts, including by ensuring that the pollution and risks are reduced well below that benchmark?
6. Will EPA require fence-line monitoring to continue permanently, and ensure that there is a corrective action requirement if the data show ethylene oxide is still a problem as it crosses into our neighborhoods?
7. Will EPA hold public meetings where we can give input on EPA's rules and any other actions it is evaluating to fix this public health problem?

#### **Enforcement & Compliance, including Clean Air Act operating permits (Title V)**

1. Will EPA make sure the rules and permits that cover these facilities actually assure compliance – by including more monitoring and public reporting, by removing all pollution loopholes (like SSM), and by considering implementing automatic admissions of violations and automatic penalties and corrective action?
2. When was the date of the last EPA inspection of these facilities and will EPA share a link showing the results of this inspection online?
3. Are there any pending federal or state enforcement actions involving this facility and how can we find out information on this facility's compliance record?
4. When will the permit/s next go out for public comment so we can participate in this process – and how can I get added to a permit notification list for this facility?
5. What is EPA doing to help people who have already experienced cancer or felt sick after breathing pollution near this source?

#### **Other Communities in Region 3:**

1. Is EPA planning to hold meetings and implement fence-line monitoring at any other Region 3 chemical plants that emit ethylene oxide, like Croda in Delaware?
2. Why isn't EPA having any meetings on the sterilizers that emit ethylene oxide in our region – like Alcon in Huntington, WV?

WV Facility Info

WVDEP presentation on ethylene oxide for elected officials (Aug. 10, 2021):

<https://dep.wv.gov/daq/Air%20Toxics/EthyleneOxide/Documents/EtO%20Elected%20Officials%20Presentation%20August%2010,%202021.pdf>

<https://dep.wv.gov/daq/Air%20Toxics/EthyleneOxide/Pages/default.aspx>

Permit background links:

Union Carbide Corporation South Charleston	039-00003		<a href="#">1-9-2018 Fact Sheet</a>	<a href="#">MM01 MM02 10-22-2018 Fact Sheet</a>  <a href="#">MM03 2-26-2019 Fact Sheet</a>  <a href="#">MM04 MM05 1-6-2020 Fact Sheet</a>
Union Carbide Corporation Technology Park	039-00004 (Group 1 of 2)		<a href="#">12-2-2020 Fact Sheet</a>	
Union Carbide Corporation Technology Park	039-00004 (Group 2 of 2)		<a href="#">12-2-2020 Fact Sheet</a>	
Union Carbide Corporation Institute Catalyst Plant	039-00005 (Part 1 of 8)		<a href="#">12-5-2016 Fact Sheet</a>	<a href="#">MM01 9-25-2017 Fact Sheet</a>
Union Carbide Corporation Institute Logistics EO Distribution	039-00005 (Part 3 of 8)		<a href="#">8-1-2017 Fact Sheet</a>	<a href="#">AA01 9-26-2019</a>

Specialty Products US, LLC Institute Glutaraldehyde Plant	039-00682 (1 of 2)	<a href="#">5-16-2017 Fact Sheet</a>	<a href="#">MM01 10-22-2019 Fact Sheet</a>
Specialty Products US, LLC Institute Water Soluble Polymers	039-00682 (2 of 2)	<a href="#">12-19-2017 Fact Sheet</a>	<a href="#">MM01 4-16-2019 Fact Sheet</a>

Covestro LLC South Charleston (formerly Bayer MaterialScience)	039-00102	<a href="#">10-6-2017 Fact Sheet</a>	<a href="#">MM01 4-16-2019 Fact Sheet</a> <a href="#">MM02 12-14-2020 Fact Sheet</a>
--	-----------	--	---