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April 14, 2021

John Mooney, Director
Air and Radiation Division
US Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3507

Dear Mr. Mooney:

In June of 2019, the Lake County Health Department (LCHD), in conjunction with the Village of Gurnee and the City of Waukegan began an ambient air monitoring program for ethylene oxide (EtO) around two Lake County facilities (Vantage Specialties in Gurnee, and Medline Industries in Waukegan). This program was developed with the assistance, input, and expertise of your agency. Your agency provided the air monitoring protocols and determined the air sampling locations. That technical assistance continued through the completion of the air monitoring program in May of 2020. Your agency also performed a thorough review of the data collected, and all accompanying documentation from the monitoring contractor and contract laboratory. LCHD provided all requisite documents to your agency in October of 2020 to perform this review and analysis.

On behalf of the residents of Lake County, we want to express our gratitude for all the technical assistance and support your agency provided. LCHD did not have the expertise to develop the air monitoring program and without your guidance, it would not have been possible. Our goal has been to contract for ambient air collection and analysis and to provide the data to our expert, regulatory partner agencies to clearly determine the risk that EtO poses to our Lake County residents. With that goal in mind, we secured a commitment from the Agency for Toxic Substances and Disease Registry (ATSDR) to produce a health risk assessment. We also secured a commitment from the Illinois Department of Public Health (IDPH) to conduct a cancer incidence rate study in our county, based on the risk zones delineated by the ATSDR analysis.

Our dilemma is that we have not yet received the ATSDR risk assessment, nor are we confident it will be forthcoming soon. This concern is based on the facts that we cannot get an estimate of the time the report will be completed by ATSDR and that the full health risk assessment report for the Sterigenics facility in Willowbrook has not yet been released by ATSDR.

We are given hope as we see that the U.S. EPA provided the conclusions of your agency's risk assessment for the Sterigenics facility on May 29, 2019 (mere weeks after the conclusion of the air monitoring), and published the complete report in August of that year (<https://www.epa.gov/il/risk-assessment-report-sterigenics-facility-willowbrook-il>).

On behalf of the residents of Lake County, please consider this letter a request to produce a risk assessment for the EtO-emitting facilities in Lake County as was done for Sterigenics.

We would then be able to provide that assessment to the IDPH to begin their cancer incidence rate study as soon as they are able.

As you are aware, the federal government made grant funding available to other communities around the country to conduct air monitoring. Lake County's robust monitoring program, funded primarily by the Illinois EPA, resulted in air monitoring data for EtO over a 150-day period. Your agency has graciously analyzed that data set for validity and fidelity to the method, but we are formally requesting that you go one step further and produce a risk assessment so that the people of Lake County can fully know and understand the health risk they may face due to EtO emissions from the two facilities in our county.

In closing, the Lake County Board and the Lake County Board of Health are grateful for the support of the U.S. EPA and request further action on behalf of our residents in the form of a risk assessment.

Again, we thank you for your partnership and look forward to your response.

Sincerely,



Sandra Hart
Chair, Lake County Board



Tim Sashko
President, Lake County Board of Health

cc: Mark Pfister, Executive Director, Lake County Health Department and Community Health Center
Dr. Mark Johnson, ATSDR Region 5
CAPT Michelle Colledge, ATSDR Region 5