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April 14, 2021

Dr. Patrick Breysse, Director  
National Center for Environmental Health  
Agency for Toxic Substances and Disease Registry  
4770 Buford Highway NE  
Atlanta, GA 30341

Dear Director Breysse:

On March 26, 2019, the Lake County Health Department (LCHD) sent you a formal letter of petition, requesting the National Center for Environmental Health/Agency for Toxic Substances and Disease Registry (ATSDR) to perform a health risk assessment based on ambient air monitoring for ethylene oxide (EtO) around two Lake County facilities (Vantage Specialties in Gurnee, and Medline Industries in Waukegan). Ambient air monitoring was set to begin in June of 2019. The letter described the planned 30-day monitoring program and requested that the ATSDR *“assess whether exposure to these ambient EtO conditions pose a public health hazard to the Lake County community.”* The petition also requested assistance *“with public risk communication and healthcare provider education support as this is a challenging issue for our residents and it is requisite to communicate fully.”*

LCHD’s request for an assessment (based on 30 days of monitoring) was made with the knowledge that ATSDR produced a Letter of Health Consultation on August 21, 2018 regarding the Sterigenics sterilization facility in Willowbrook, IL based on modeling and 39 samples collected at 26 locations on two days in May of 2018. Based on the sampling protocol recommended by the U.S. EPA, our desire was that samples collected at 10 locations, every third day over a 30-day period, with additional samples collected at 4 sites on “random” (for a total of 126 samples) would provide a sufficient source of data to perform this assessment.

On April 10, 2020, LCHD received a response to its petition from Susan McAfee Moore, the Acting Director of the Division of Community Health Investigations at ATSDR. The response stated that *“(A)fter the results of the EtO air-monitoring program are available, ATSDR will then be able to determine what additional ATSDR public health activities would be appropriate.”* Mark Pfister, Executive Director of the LCHD, followed up by phone with Dr. Mark Johnson, ATSDR Region 5 Office Director, who assured him that the assessment would be completed. After receiving this assurance from the ATSDR, Director Pfister sought out and received concurrence from the Illinois Department of Public Health (IDPH) that they would conduct a cancer incidence rate study based on the health risk assessment, which would guide IDPH in establishing the appropriate study area(s).

In subsequent conversations with the ATSDR’s Dr. Johnson and Captain Michelle Colledge, they made it clear that in order to conduct a complete health risk assessment, ATSDR advised that more air monitoring be conducted. At that time, the LCHD again requested a report like the

letter of health consultation produced for the Sterigenics facility in Willowbrook based on only 39 samples collected on 2 days, but the request was not approved.

In June of 2019, through the coordinated efforts of Lake County, the City of Waukegan, the Village of Gurnee, and State and local elected officials, intergovernmental agreements were established between the Illinois EPA and the two municipalities to fund additional air monitoring. LCHD officials met on multiple occasions in August and September with ATSDR officials to plan for the health risk assessment and to assure the needs and requirements of the ATSDR were met. In October of 2019, the Illinois EPA agreed to fund additional monitoring that was designed to assure that post-pollution controls testing was conducted around both EtO-emitting facilities.

Overall, over 600 air samples were collected over 150 days of monitoring, conducted in 3 phases. The monitoring around the Vantage site was all completed after the required pollution controls were in place (as they installed additional scrubbers in April of 2019 and our monitoring began in June of 2019). For the Medline site, Medline installed some pollution controls in the first week of the additional 30-day monitoring (re-routed the back-vent emissions to treatment). During the second 90-day phase, Medline operated without full controls in place for about half of that time period, but then shut down operations for the duration of the 90-day period to complete the installation of IEPA newly required pollution controls. An additional 30-day period of monitoring was conducted after Medline resumed operations with all mandated pollution controls in place.

The last phase of the monitoring program ended on May 2, 2020. In June of 2020, LCHD provided the complete set of data for all phases of the monitoring program to the U.S. EPA, the ATSDR and the IEPA. Both the USEPA and the ATSDR analyzed and questioned some of the results based on the pressure readings reported on the lab result sheet. LCHD was requested at that point to secure additional supporting documents from both the air monitoring contractor (GHD Services, Inc.) and the laboratory (Eastern Research Group). Over the next few months these additional documents (including field sheets/notes and chain-of-custody forms) were secured, and all were provided to U.S. EPA and the ATSDR in October of 2020.

The residents of Lake County have been patiently awaiting this report for many months now, and they need and deserve to know the health risks they are facing. Without this report, the Illinois Department of Public Health cannot conduct a cancer incidence rate study, which is also critical information for the residents of Lake County.

In Willowbrook, the ATSDR produced a letter of health consultation within 3 months of the sampling upon which it was based. That consultation clearly stated that health risk existed for the residents in that area, and provided the basis for residents, and elected and health officials to press for action to reduce or remove that risk. In Lake County, we do not have a comparable report that clearly delineates and quantifies the risk to our residents.

In closing, the Lake County Board and the Lake County Board of Health are requesting immediate action on producing a health risk assessment for the people of Lake County. We have been informed that the complete health risk assessment for the Sterigenics facility also has not yet been completed, and that air monitoring ended in March of 2019. My hope is that we will not face a similar delay in the production of the Lake County report. If that is to be the case, we would request at least a letter of health consultation, as was produced for Sterigenics in August of 2018.



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

Sincerely,

A handwritten signature in black ink, appearing to read "Sandra Hart".

Sandra Hart  
Chair, Lake County Board

A handwritten signature in black ink, appearing to read "Tim Sashko".

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