ETHYLENE OXIDE:
A CONVERSATION WITH EPA AND WVDEP

For the Communities of South Charleston and Institute, West Virginia
September 23, 2021
GOALS

• Share information on Ethylene Oxide
• Present EPA and WVDEP actions
• Discuss Next Steps
• Answer Questions
Ethylene Oxide

- What is Ethylene Oxide (EtO)?
- What are its uses, and why is it important?
- What are the findings for S. Charleston and Institute, WV?
- What are EPA and WVDEP doing about EtO?
- Where can I find more information about EtO?
WHAT IS ETHYLENE OXIDE?
What is EtO?

- A colorless gas at room temperature
- Flammable
- Used to make other chemicals
- Sterilizing agent
- Created naturally
What is EtO used for?

- Chemical facilities manufacture EtO to produce things we use every day

- Makes ethylene glycol, which is a key ingredient in a variety of consumer household products
What is EtO used for?

- To sterilize things that cannot be sterilized by other methods
  - Medical equipment
  - Surgical equipment and supplies
- To fumigate certain items that cannot get wet
Sources of EtO Emissions Nationwide

Ethylene Oxide Emissions (tons)
from National Emission Inventory Point Data Category
WHY IS ETHYLENE OXIDE IMPORTANT?
EtO Health Impacts

EtO is a carcinogen and can damage the nervous system:

**Acute symptoms (short term):** May cause eye/skin/respiratory irritation, headache, nausea

**Chronic symptoms (long term):** May cause cancer, mutagenic (it can damage DNA) changes, neurotoxicity
EtO History

- **1985**: Integrated Risk Assessment (IRIS) completed based on animal exposure studies
- **2016**: Integrated Risk Information System (IRIS) completed based on human occupational studies
- **2018**: EPA’s National Air Toxics Assessment (NATA) alerted state and local agencies to potential elevated cancer risks from its screening analysis
- **2020**: EPA Office of Inspector General’s Management Alert advised EPA to conduct meetings to communities
Exposure to EtO

- Workers may be exposed to EtO if they work in places where EtO is produced or used, such as chemical plants and commercial or hospital sterilizers.

- People who live near facilities that emit EtO may be exposed to EtO in the outdoor air.

- It is unlikely that EtO would remain in or on food or remain dissolved in water long enough to be eaten or swallowed.

- There is limited information on levels of EtO at hazardous waste sites - in air, water, or soil.
• Risk to get cancer from breathing ethylene oxide is based on exposure for 24 hours a day for 70 years

• One-time, short-term exposure to low amounts of ethylene oxide should not cause immediate harm to a person’s health

• Long-term ethylene oxide exposure increases the risk of cancers of the white blood cells including: non-Hodgkin lymphoma; myeloma; lymphocytic leukemia and breast cancer in women
WHAT ARE THE FINDINGS FOR SOUTH CHARLESTON AND INSTITUTE, WV?
EtO Emissions Data

Facility Emissions

<table>
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<tr>
<th>Facility</th>
<th>2014 Emissions (tpy)</th>
<th>2017 Emissions (tpy)</th>
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<tr>
<td>UCC - Institute</td>
<td>2.909</td>
<td>0.812</td>
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<tr>
<td>UCC - SO CHARLESTON</td>
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<td>0.355</td>
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<tr>
<td>Covestro LLC - SOUTH CHARLESTON</td>
<td>0.093</td>
<td>0.082</td>
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EtO Modeled Risks

Modeled Risks

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<tr>
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<th>UCC - Institute</th>
<th>UCC-SO CHARLESTON</th>
<th>Covestro LLC - SOUTH CHARLESTON</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014 Modeled Census Block Cancer Risk (in a million)</td>
<td>1369</td>
<td>1049</td>
<td>109</td>
</tr>
<tr>
<td>2017 Modeled Census Block Cancer Risk (in a million)</td>
<td>379</td>
<td>807</td>
<td>185</td>
</tr>
</tbody>
</table>
HOW DOES EPA ADDRESS EtO RISK?
Human Exposure Model for EtO Risk

- Used primarily for sources emitting air toxics to the air
- Models inhalation exposure to predict estimated risks above background
- Produces estimates of cancer risk and noncancer hazards for air toxics
- Exposure variables are not explicitly addressed

More information can be found at:
Why are there different risk values for EtO?

- Texas has a cancer risk value substantially lower than EPA’s IRIS risk value for two main reasons:
  - A smaller data set that did not include breast cancer in women as an outcome and the Texas value is based only on lymphoid cancer
  - Because we used different data, Texas selected a statistical model that both EPA and the Science Advisory Board determined does not adequately describe the relevant human cancer data
What does a 1-in-a-million cancer risk mean?

- A cancer risk level of 1-in-1 million implies that,
  - if 1 million people are exposed to the same concentration of EtO continuously (24 hours per day) over 70 years (an assumed lifetime)
  - one person would likely contract cancer from this exposure
- This risk would be in addition to any cancer risk borne by a person not exposed to EtO
Using 2017 emissions National Air Toxics Assessment model, EPA estimated the potential increased cancer risk from breathing EtO released from the facilities.

- South Charleston area to be **807 cases in one million for Union Carbide** and **185 cases in one million for Covestro**.
- **379 in one million for Union Carbide** in Institute WV.
Factors that affect EtO’s health risks

- Your personal health risks (such as age, family history, lifestyle)
- How much EtO is in the air you breathe
- How long you have been breathing air with that level of EtO
- How often you breathe EtO at that level
- For everyone, including children, risks would decrease with decreased exposure
WHAT IS EPA DOING ABOUT E\textsubscript{\textit{tO}}?
EPA has monitored the air for ethylene oxide across the nation as part of our air toxics network.

We found a range of results nationally where EtO was detected and had high levels of EtO and higher risk.

- These high results were not in EPA Region 3—not in West Virginia.

- However, some of these results are also not associated with a known regulated source.

We are continuing to study the areas to better understand where the ethylene oxide is coming from.

- For example, the Office of Transportation and Air Quality are looking into possible mobile emissions.
MONITORED LEVELS

- We are also working on getting better at measuring lower concentrations of EtO.
  - We have higher confidence in measuring at concentrations near sources.
  - We have identified and are working to improve the method to reduce issues regarding sample collection and analysis.
  - Analysis methods continue to improve so that we can reduce the uncertainty in the measurements and allow for a better understanding of EtO concentrations in ambient air.
EPA’s EtO Response Strategy

- Review Clean Air Act regulations for facilities that emit ethylene oxide.

- Identify ways to reduce emissions:
  - Work with state agency partners to gather updated EtO facility emissions
  - Discuss voluntary controls with industries.
  - Continue to work and support state partners.
EPA Regulations for EtO Emissions

- 40 CFR. Part 63, Subpart FFFF: Miscellaneous organic chemical manufacturing

- 40 CFR Part 63, Subpart PPP: Polyether polyols production


- 40 CFR Part 63, Subpart EEEE: Organic liquids distribution (non-gasoline)

- 40 CFR Part 63, Subpart O: Ethylene oxide-emitting (commercial) sterilization facilities

- 40 CFR Part 63, Subpart WWWW: Hospital sterilizers
Upcoming Regulatory Reviews

• Commercial Sterilizers: Oct.-Dec., Fiscal Year (FY) 2022
• Hospital Sterilizers: Oct.-Dec., FY 2023
• Group 1 Polymers and Resins: April-June, FY 2024
• Synthetic Organic Chemicals Manufacturing Industry: April-June, FY 2024
• Polyether Polyols Production: Oct.-Dec., FY 2024
• Chemical Manufacturing Area Sources: Oct.-Dec., FY 2024
EPA and West Virginia Collaboration

- R3 and the West Virginia Department of Environmental Protection (WVDEP) have been working together to refine the NATA screening analysis.
- Both R3 and WVDEP have collaborated in modeling EtO emissions from Union Carbide, S. Charleston; Union Carbide, Institute; and Covestro, S. Charleston.
- Current modeling results continue to show levels of concern, although less widespread.
Next Steps

➢ EPA will continue to collaborate with WVDEP to model risk impacts using more recent 2020 data to determine risk trends.

➢ We will support WVDEP’s short term sampling to confirm modeled results.

➢ We will continue to hold joint meetings to inform the communities of our efforts.
INTRODUCING WVDEP
ADDITIONAL RESOURCES
Additional Resources on EtO

- The following national EPA websites have additional EtO information:
  - [https://www.epa.gov/hazardous-air-pollutants-ethylene-oxide](https://www.epa.gov/hazardous-air-pollutants-ethylene-oxide)

- A recording of these presentations and answers to questions not addressed will be posted on:
  - [https://dep.wv.gov/daq/Air%20Toxics/EthyleneOxide/Pages/default.aspx](https://dep.wv.gov/daq/Air%20Toxics/EthyleneOxide/Pages/default.aspx)

- Additional comments can be posted to:
  - DEP.Comments@wv.gov
Contacts on EtO

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THANK YOU
OTHER FEDERAL AGENCIES

- **Centers for Disease Control**
  - The Agency for Toxic Substances and Disease Registry (ATSDR) provides scientific and health effects information on EtO.
  - The National Institute for Occupational Safety and Health (NIOSH) is a research agency focused on assuring safe and healthful working conditions.
    [https://www.cdc.gov/niosh/topics/ethyleneoxide/default.html](https://www.cdc.gov/niosh/topics/ethyleneoxide/default.html)

- **The Food and Drug Administration (FDA)**
  - FDA reviews the sterility information for most sterile medical devices before they are on the market. Learn more at [https://www.fda.gov/medical-devices/general-hospital-devices-and-supplies/ethylene-oxide-sterilization-medical-devices#how](https://www.fda.gov/medical-devices/general-hospital-devices-and-supplies/ethylene-oxide-sterilization-medical-devices#how)

- **The Occupational Safety and Health Administration (OSHA)**
U.S. EPA and WVDEP Community Meeting:

Ethylene Oxide in the Institute and South Charleston Areas

September 23, 2021 via Zoom
Introduction

WVDEP Deputy Cabinet Secretary
Scott Mandirola
Introduction

WVDEP Division of Air Quality
Mike Egnor, Air Toxics Coordinator
What has WVDEP done?

• August 2018 – U.S. EPA publicly released the National Air Toxics Assessment (NATA)

• NATA identified four census tracts in the Kanawha Valley for further investigation
What has WVDEP done?

- WVDEP requested the state Department of Health and Human Resources (DHHR) to review EtO associated cancer rates in the Kanawha Valley
  - DHHR compared Kanawha County vs. West Virginia using the WV Cancer Registry
  - No elevated levels of breast, lymphoma, or leukemia cancers found for Kanawha County as a whole
  - Kanawha County is not significantly higher than other counties in the state
- DHHR is currently reviewing cancer rates on a more localized level
What has WVDEP done?

• 2019: Requested the most recent and accurate emissions data and onsite weather data

• Visited the Institute and South Charleston facilities

• Updated the model with the more accurate emissions and weather data
  - The locations and level of risk changed as a result
What has WVDEP done?

- December 2019: Issued press release identifying the elevated risk factor of ethylene oxide

- Jan 2020: Formally requested U.S. EPA to prioritize the review of the federal regulation to which the facilities are subject
Facilities in the Kanawha Valley that emit EtO

- Institute
  - Union Carbide Corporation
  - Specialty Products US, LLC

- South Charleston
  - Union Carbide Corporation
  - Covestro LLC
Total Ethylene Oxide Emissions in the Kanawha Valley

<table>
<thead>
<tr>
<th>Year</th>
<th>Institute</th>
<th>South Charleston</th>
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<tbody>
<tr>
<td>2014</td>
<td>4,000</td>
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<tr>
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<tr>
<td>2020</td>
<td>1,500</td>
<td>250</td>
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South Charleston, WV Ethylene Oxide Risk
EPA/DAQ HEM 2017/2019 Data
Union Carbide Corporation and Covestro

Ethylene Oxide Risk in a million
- Green: 0 - 20
- Yellow: 20 - 100
- Red: >100
- Star: Maximum

0 0.5 1 2 Miles
Next Steps

• Four (4) sets of short-term monitoring in both the South Charleston and Institute areas

• Compare air monitoring data with modeling results

• Model actual emissions to compare with air monitoring data
Summary

- WVDEP has been working with U.S. EPA, the facilities, and DHHR to accurately identify the risks
- Questions remain regarding the revised U.S. EPA risk factor for EtO
- Questions remain regarding the background levels of EtO
- WVDEP is committed to continuing working with U.S. EPA, the facilities, and DHHR to address the associated risks
- WVDEP is committed to continued dialogue with the community and holding additional meetings as new information becomes available
Additional Resources

• The WVDEP has a webpage dedicated to EtO: https://dep.wv.gov/daq/Air%20Toxics/EthyleneOxide/Pages/default.aspx

• All new information, as well as the recording from tonight’s meeting, will be added as soon as it becomes available

• Additional questions for the WVDEP can be submitted via email to DEP.Comments@wv.gov

• Media inquiries should be directed to Terry Fletcher, WVDEP Acting Communications Director, at Terry.A.Fletcher@wv.gov