

Cooley, James

From: Hoffman, Kathy <KHoffman@sterigenics.com>
Sent: Thursday, September 26, 2019 6:11 PM
To: Cooley, James
Subject: Request for More Information
Attachments: Atlanta EO Leak Incidents - 2014 to 2019 - Estimate Descriptions - 26-Sept-2019.pdf

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Attorney Work Product

As requested, we have revised the previously submitted 5-Year EO Release Summary Table to include more detailed descriptions of how the leak amounts were estimated. I hope this provides the information needed.

Let me know if you want to discuss this further.

Regards,
Kathy

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EO Leak or Release Incidents - Sterigenics Atlanta Facility
2014 through 2019 (as of 29-Aug-2019)

Incident Date	Description	Release Amount (lbs)	Source Area	Method for Amount Determined	Investigation Conducted	Incident Status
2/9/2015	Area evacuation (LEL 25 - Chamber 6 Vacuum pump)	0.1	Leak from Chamber 6 vaporizer	Estimate based on monitor reading for short duration (less than 1-minute), and source which was a small fitting with no visible opening.	Yes	Closed
11/11/2015	Area Evacuation	0.06	Leak from Chamber 4 vacuum pump site glass	Immediate response to stop the small leak.	Yes	Closed
11/17/2015	Area evacuation (SRI Channel 4- Retort room)	0	Elevated reading from Channel 4 retort room. No leak identified and reading returned to normal within 2 minutes.	Initial area evacuation was caused by a brief GC monitor reading. The leak estimate was based on readings of 0ppm on all other area and handheld monitors and no evidence of leaking equipment.	Yes	Closed
1/31/2017	Area evacuation (SRI Channel 4- Retort room)	0.06	Elevated reading from Channel 4 retort room. No leak identified but some levels of fugitive emissions found.	Initial area evacuation was caused by a brief low level GC monitor reading. The investigation confirmed no leaking equipment, low level (<1ppm) on handheld monitor and the source of emission to be elevated fugitives in the area. The estimated amount of EO in the area was determined to be negligible (<1oz).	Yes	Closed
6/11/2017	Drum Leak	0.1	Drum Leak	This leak occurred after a drum change. The EO drum was reweighed and showed no loss in weight. Estimated 0.1 lb maximum loss based on scale reading variability.	Yes	Closed
4/2/2018	Area evacuation (SRI port # 6)	2.6	Leak from Chamber 10 vacuum pump discharge line	Incident was originally reported to reg. agencies as potential reportable incident. After thorough investigation and engineering review, the leak estimate was calculated using flow equations for leakage through 1/16-inch crack in vacuum pump piping at given pressure.	Yes	Closed
7/10/2018	Chamber Deflagration	1	Leak into chamber resulting in deflagration	Investigation determined majority of EO gas was consumed in deflagration. Investigation showed EO leak into the chamber. The chamber backvent captured most of the EO gas and sent to a pollution control device. The remaining EO gas was consumed in the deflagration. Based on this we conservatively estimated the leak to be < 1 lb.	Yes	Closed
7/17/2018	Area Evacuation	0.1	Leak from Chamber 3 vacuum pump	Investigation found a loose fitting on oil/water separator of vacuum pump located very close to LEL monitor. Based on the short duration of the low reading, proximity to LEL monitor and immediate response to fix the leak, the estimated amount of EO leaked was determined to be < 1oz.	Yes	Closed
4/10/2019	Area Evacuation	0.06	Leak during Chamber 7 drum change	This incident occurred during an EO drum change. The operator reported a few drops of liquid EO came from the disconnected line. The valve was closed immediately to stop the leak. The EO drum was reweighed and showed no weight loss. Estimated amount of EO leaked was determined to be < 1oz.	Yes	Closed
7/31/2019	Area Evacuation	5.6	Leak following drum change from 2014 until 29-Aug-2019	This incident occurred after an EO drum change. The empty drum was not sealed properly and employee knew drum contained < 10lbs. EO. The drum was reweighed and the amount of EO lost was 5.6lbs.	Yes	Closed
Totals		9.68				