

**Comments William Barrett**  
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**Docket Id. Docket ID No. EPA-HQ-OAR-2019-0178**  
**Reconsideration of Ethylene Oxide Emissions Standards for Sterilization**  
**Facilities Residual Risk and Technology Review Reconsideration**

My name is Will Barrett, Assistant Vice President for Nationwide Clean Air Policy with the American Lung Association. I am speaking to you today from Sacramento, California and call on EPA to withdraw this proposal that will harm health.

In the development of the 2024 Standards for Ethylene Oxide at Sterilization facilities, the Lung Association and partners representing physicians, nurses, and others in the health community called for strong standards to reduce exposures to cancer-causing ethylene oxide, while maintaining access to critical sterile medical equipment.

We feel that the 2024 standards accomplished both goals and we applauded EPA's action at the time. The 2024 rule utilized common-sense control measures to reduce escaped emissions. The existing rules are estimated to eliminate 90% of ethylene oxide emissions from commercial sterilizers and reduce cancer risks by 92%.

We noted then that: "The patients with lung disease that our organization serves also need access to safe and clean medical supplies. We appreciate the work EPA put into ensuring that this final rule both cleans up harmful emissions and ensures continued access to sterilized medical equipment.

Now, EPA's own – and limited – regulatory analysis underpinning the repeal of these critical health protections notes that the proposal will increase emissions of EtO by 7.8 tons per year over the existing rule. That is unacceptable.

In proposing to allow this increase of carcinogenic pollution in American communities, the EPA analysis spends just one paragraph on the intense harm this decision will cause, noting:

- The Department of Health and Human Services classified EtO as a known human carcinogen.
- The EPA has concluded that EtO is carcinogenic to humans by inhalation
- Human exposure evidence indicates exposure to EtO increases the risk of
  - lymphoid cancer
  - Non-Hodgkin lymphoma
  - Myeloma
  - Leukemias
  - Breast cancer

EPA notes exposure leads to

- irritation of the eyes, skin, nose, throat, and lungs

- Damage to the brain and nervous system
- Reproductive and developmental effects
- Chromosome damage as EtO affects our DNA
- The extraordinarily list of devastating human health impacts concludes noting that “children may be particularly susceptible.”

The proposal weakens emission controls set in 2024 also allows facilities to reduce continuous monitoring for emissions that will harm their neighbors.

Those who work in these facilities, or live, play or go to school nearby will face an elevated risk as the result of this EPA proposal. This is unacceptable and a far cry from the mission of the EPA to protect health.

The 2024 standards set a common-sense bar for health protection in a field built on delivering sterile medical equipment to the bedside.

We call on EPA to revoke this proposal that will put more people in hospital beds.