REGION 4
ATLANTA, GA 30303

SENT VIA ELECTRONIC MAIL

Austin Davies
Cardinal Health
1430 Marvin Griffin Rd
Augusta, GA 30906
Austin.davies@cardinalhealth.com

Dear Austin Davies:

On May 29, 2024, the U.S. Environmental Protection Agency Region 4 Air Enforcement Branch conducted a Partial Compliance Evaluation inspection of KPR, Kendall Healthcare Products Company, located in Augusta, Georgia. Enclosed is the final report generated for this inspection (Enclosure).

If you have any questions, please contact me at (404) 562-9206, or by email at hughes-fairley.rosalyn@epa.gov.

Sincerely,

Rosalyn Hughes Fairley

Digitally signed by Rosalyn Hughes Fairley
Date: 2024.07.25 15:39:47 -04'00'

Rosalyn Hughes Fairley
Environmental Engineer
South Air Enforcement Section

Enclosure

ENCLOSURE
INSPECTION REPORT

United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Inspection Report

I. GENERAL INFORMATION

Facility Name: KPR/Kendall Healthcare Products Company

Location (Address): 1430 Marvin Griffin Rd., Augusta, GA 30906

Inspection Date: May 29, 2024

Type of Inspection (Full or Partial Compliance Evaluation):
Partial Compliance Evaluation

PROGRAMMATIC ID: GA000000132450109

PERMIT NUMBER: 3842-245-0109-S-05-0

EPA Region 4 Investigator(s)/Inspector(s):

1. Rosalyn Hughes Fairley, Environmental Engineer
2. Kevin Taylor, Environmental Engineer

State/Local Investigator(s)/Inspector(s):

1. Jack Habib, GEPD
2. Adrienne Tabor, GEPD
3. Bethany Dillard, GEPD

Person(s) Contacted at Facility (Name and Title):

1. Daryl Dishmond, Reliability Engineer
2. Omar Dominguez Perez, Sterilization Engineer
3. Mark Barnes, Process Specialist
4. Steve Burnett, Materials Manager

Report Prepared by: Rosalyn Hughes Fairley

FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	Ethylene Oxide Sterilizer
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	3842-245-0109-S-05-0
3. Air permit issuance date.	September 27, 2017
4. Air permit expiration date.	No expiration date
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Synthetic Minor
6. Major source pollutants (if applicable).	N/A
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	State Implementation Plan NSPS Subparts Dc, NESHAP Subpart O
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Boilers, Sterilizers
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	Catalytic Oxidizer

B. Process Description

KPR/Kendall Healthcare Products Company is the name of the facility on the current permits. The facility, however, is now Cardinal Health. The facility employs approximately 260 staff and runs three 8-hour shifts. The company makes medical

gauze and foam gauze along with alcohol wipes. The sterilization process time is different depending on the product being sterilized.

KPR has two ethylene oxide sterilization chambers. The difference in the chambers are the products, which require different sterilization times. The products are loaded into the chambers and the sterilization mixture is injected. The amount is monitored by sensors. After the sterilization cycle is complete, the gas is recycled from the chambers into the recovery tanks. The chambers are then aerated with 8 air washes before the chambers are opened and the products removed. After removal, the products are stored for shipping.

The facility has 3 boilers that are subject to 40 CFR Part 60, Subpart Dc and has taken permitted limits that include a limit on the sulfur content in the distillate fuel shall not contain more than 0.5 percent sulfur by weight; shall not discharge any visible emissions the opacity of which is equal to or greater than 20 percent; shall not allow the emission for fly ash particulate matter from the boilers using the process weight calculation; and in avoidance of the 40 CFR Part 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boiler Area Sources, the boilers are gas-fired as defined in 40 CFR Part 63.11237. Gas fired is includes any boiler that burns gaseous fuels no combined with any solid fuels, and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

II. INSPECTION ACTIVITIES

Activity	Yes No NA	Comments
Opening Meeting		
1. Date and time entered the facility.	Y	EPA Region 4 (R4) and GEPD inspectors arrived at the facility on May 29, 2024, at approximately 9:15 am.
2. Credentials presented to facility personnel (include name and title).	Y	All inspectors presented their credentials to Daryl Dishmond, Reliabilty Engineer.

Activity	Yes No NA	Comments
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Y	Inspectors held an opening meeting with Daryl Dishmond to discuss the purpose and objectives of the inspection. The Environmental. Health and Safety manager for KPR, Austin Davies and the Plant Manager were out of the office. Mr. Dishmond who was not the contact for the facility, pulled together a team to make the inspection possible.
4. Discussed safety issues.	Y	Inspectors discussed safety and the appropriate PPE.
5. Discussed which records to be reviewed.	Y	The inspection team requested to review all the records required by the permits. The records were not available for review due to the absence of the Environmental Health and Safety Manager.
6. Discussed the facility walk-through and the areas to be observed in the facility.	Y	Inspectors discussed walking through the process from the beginning
7. Discussed facility policy regarding photographs or video (if applicable).	Y	The inspectors indicated that a camera may be used to take photographs.
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	N/A	TVA/PID were not used during the inspection.
9. Discussed CBI.	Y	EPA inspectors indicated that any material claimed to be Confidential Business Information (CBI) would be treated in accordance with regulations.
Records Reviewed at the Facility		

Activity	Yes No NA	Comments
10. The types of records reviewed, and the time period reviewed.	N	The daily maintenance logs for the Boilers and fuel oil usage were reviewed. The facility has not purchased fuel oil in four years. A snapshot of the Catalytic Oxidizer temperatures at the time of the inspection were observed. The records such as the boiler inspection, the fuel oil purchase and usage records, the continuous monitoring performance evaluations calibration checks, and adjustments records were not available for review due to the absence of the Environmental Health and Safety Manager.
Facility Walk-Through Observations		

Activity	Yes No NA	Comments
11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	The ethylene oxide mixture tanks were observed. The pressure relief valves have rupture disks and are checked every 2 years. The boilers were observed and the fuel oil records were reviewed. The most recent maintenance records for the boilers were reviewed. The facility indicated that no fuel oil had been received in the past four years.

Activity	Yes No NA	Comments
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	

Activity	Yes No NA	Comments
14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Y	On May 29, 2024, at approximately 10:30 am, the catalytic oxidizer was observed operating at a temperature of 310°F. The permitted limit is at or above 300°F. The catalyst in the Catalytic Oxidizer was changed in November 2023 as required by Subpart O and the permit.

Activity	Yes No NA	Comments
15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	.
17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	

Activity	Yes No NA	Comments
18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	Y	
19. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N	
20. Were any visible emissions observed? (if yes, identify the location and equipment).	N	
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	N	
22. Was the cause of the visible emissions investigated and the information documented?	N/A	

Activity	Yes No NA	Comments
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N	
24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	N	The infrared camera was not used.

Activity	Yes No NA	Comments
26. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	N	EPA R4 inspectors did not use a TVA at the facility.
27. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	N	EPA R4 inspectors did not use a PID at the facility.
Closing Meeting		
28. Conducted a closing meeting.	Y	EPA Region 4 inspectors conducted a closing meeting on May 29, 2024, at approximately 12:15 pm.

Activity	Yes No NA	Comments
29. Summarize any additional information needed, if applicable?	Y	Most of the boiler records and the catalytic oxidizer records were not reviewed due to the absence of the Environmental, Health, and Safety Manager. The inspectors indicated that an information request of the records may be issued, since they were not available during the inspection.
30. Accept a declaration of CBI, if applicable?	N/A	
31. Discussed observations.	Y	Inspectors thanked facility personnel for their time and summarized inspection activities.
32. Discussed next steps, if applicable?	Y	A final inspection report from EPA Region 4 will be sent to the company within a 70-day timeframe.
33. Date and time inspection concluded.		The inspection concluded on May 29, 2023, at approximately 1:00 p.m.
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	.

EPA Investigator/Inspector Signature: Rosalyn Hughes Fairley Digitally signed by Rosalyn Hughes Fairley Date: 2024.07.25 15:22:10 -04'00'

EPA Supervisor Signature & Title: TODD GROENDYKE Digitally signed by TODD GROENDYKE Date: 2024.07.25 15:29:10 -04'00'

Date Report Finalized: _____