



# Ethylene Oxide Information Removals Undermine Public Comments on the Proposed Rule

Environmental Data and Governance Initiative's Comment on the Environmental Protection Agency Proposed Rule: National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review Reconsideration (Docket ID No. EPA-HQ-OAR-2019-0178)

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*The Environmental Data and Governance Initiative (EDGI) is a network of academics, technologists, and non-profit professionals that promotes communities' right to know, evidence-based policy-making, and public interest science. We document, contextualize, and analyze environmental data, information, and governance practices through multidisciplinary and cross-professional collaborative work. EDGI includes more than 100 members in North America residing in 15 U.S. states.*

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**The Environmental Data and Governance Initiative (EDGI) welcomes the opportunity to comment on the Environmental Protection Agency Proposed Rule: National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review Reconsideration (Docket ID No. EPA-HQ-OAR-2019-0178)**

## A. Introduction

EDGI's comment on the proposed "[National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review Reconsideration](#)" focuses on the comprehensive removal of information about ethylene oxide from across the Environmental Protection Agency's website immediately before the release of the proposed rule.<sup>1</sup> EDGI asserts that these information removals ahead of and during the comment period severely limit the public's ability to comment on the proposed rule under the Administrative Procedure Act. We urge the Environmental Protection Agency (EPA) to uphold the integrity of the notice-and-comment rulemaking process by restoring access to all of the previously available webpages related to ethylene oxide that have been removed, as continued access to the full information landscape is integral for various groups in writing public comments.

The EPA website has historically been one of the most [accessible](#),<sup>2</sup> [intelligible](#),<sup>3</sup> and comprehensive resources available to the public for understanding the history, use, impacts, and risks of ethylene oxide (EtO). In order to write informed public comments on the EPA's proposed changes to ethylene oxide regulations, the public must have access to information about the risks of the chemical to human and environmental health and how to mitigate them; EtO facilities located in their communities and federal efforts to minimize harms from these facilities; and the regulatory history of EtO. All of this information has a direct impact on the public's understanding of the implications of the changes to EtO regulation in the proposed rule, and therefore on public comments responding to it.

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<sup>1</sup> US EPA, "National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review Reconsideration," Federal Register, March 17, 2026,

<https://www.federalregister.gov/documents/2026/03/17/2026-05167/national-emission-standards-for-hazardous-air-pollutants-ethylene-oxide-emissions-standards-for-sterilization-facilities-residual-risk-and-technology-review-reconsideration>.

<sup>2</sup> US EPA, "Web Standard: Accessibility," EPA, September 3, 2025,

<https://www.epa.gov/web-policies-and-procedures/web-standard-accessibility>.

<sup>3</sup> US EPA, "Plain Writing," EPA, February 3, 2026,

<https://www.epa.gov/web-policies-and-procedures/plain-writing>.

However, on the same day that the EPA announced the proposed rule,<sup>4</sup> extensive information about EtO was removed from across the agency's website.<sup>5</sup> The removals span more than 60 webpages under EPA's domain dedicated to understanding EtO as a hazardous air pollutant, including information about EtO, its risks, and EPA's attempt to address them; information about community outreach efforts, specific facility information, state-specific pages, and status reports; and regulatory information on EtO. EDGI maintains that the information on these pages is relevant to understanding and responding to the proposed rule in general, and especially relevant to answering questions #7, #9, #10, #13, and #20 posed by the EPA for response in the proposed rule. We urge the EPA to restore access to all of the previously available webpages related to ethylene oxide that have been removed.

Beyond removing information relevant to the proposed rule from its website, EPA is also disregarding research on ethylene oxide from other government agencies, independent research bodies, and even itself. Within the proposed rule, the agency discounts or dismisses prior conclusions about EtO's toxicity and its impacts to human health. We detail these resources and information in our answers to question #3 and question #5. We urge the EPA to fulfill its mission by considering the full breadth of government and independent information presented in these resources, and to do everything in its power to minimize EtO's risk to humans and the environment when developing its final changes to EtO regulations.

## B. Information Removals Undermine Public Engagement

In response to Question #7, Question #9, Question #10, Question #13, and Question #20, the Environmental Data & Governance Initiative contends that the deletion of information across the EPA's website before the comment period prevents individuals from accessing

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<sup>4</sup> US EPA. "EPA Releases Proposal for Commercial Sterilizers to Safeguard the Supply of Life-Saving Medical Tools." EPA, March 13, 2026.

<https://www.epa.gov/newsreleases/epa-releases-proposal-commercial-sterilizers-safeguard-supply-life-saving-medical>.

<sup>5</sup> EDGI, "EPA Removes Information about Harms of Ethylene Oxide the Day It Announces Proposal to Weaken Regulations," Environmental Data and Governance Initiative, April 3, 2026,

<https://envirodatagov.org/epa-removes-information-about-harms-of-ethylene-oxide-the-day-it-announces-proposal-to-weaken-regulations/>.

resources and research needed to answer these questions. Our response to these questions begins with us providing an overview of the removed resources, which we divide into three categories: Pages providing general information about EtO, its risks, and how those risks are being addressed; pages with information about specific EtO facilities and community outreach related to those facilities; and pages providing regulatory information related to EtO. We then provide a list of every page that was removed, before further analyzing each of these five questions individually and illustrating more specific ways that these removals undermine the public's ability to respond to them.

## I. Overview of information removals and restrictions

All of the information hosted on the [EPA's subdomain dedicated to ethylene oxide as a hazardous air pollutant](#) was removed. This domain, and particularly its homepage: "[Hazardous Air Pollutants: Ethylene Oxide](#)," previously served as the central hub for all information on the EPA website for understanding the risks of EtO, accessing EtO-related data, and learning about actions to reduce EtO harms. Since March 13, 2026, the link to this homepage has redirected to the EPA's homepage for [Ethylene Oxide \(EtO\)](#), a web domain that instead focuses on the utility of EtO in sterilizing medical equipment, among other uses, and includes extremely limited information on the known risks and harms of EtO to human and environmental health.

Many of the removed pages provided broad information on EtO, its risks, and efforts to address those risks at community and federal levels. These include pages about [our current understanding of ethylene oxide](#), namely its [risks to health](#); what [EPA](#) and [other federal agencies](#) are doing through [regulatory](#) and other means to protect communities from EtO; and [common questions](#) related to the chemical, as well as a page for people to [contact EPA](#) about EtO. Together, these alterations make up an excision of information about the known toxic effects and risks of EtO from the EPA's website.

There were also significant removals of information about specific EtO facilities, as well as details about EPA's engagement with communities surrounding these facilities to understand and address concerns about them. These removals include pages providing access to [public webinars](#) and [other outreach](#) related to the chemical. The EPA also removed a [page that provided addresses of 25 EtO facilities, organized by state](#), which are known to subject surrounding communities to elevated public health burdens, as well as another page about past [engagement with these 25 facilities](#) and the surrounding

communities. This page provided access to 25 additional pages about specific EtO facilities (such as [this one for a facility in Lakewood, CO](#)), including facility locations, information about risk assessments, details about the surrounding community, information about how EPA has engaged with the community, community outreach materials such as meeting recordings, and even visualizations of the risks posed by the facility to the community. Finally, the agency removed a [homepage for Inspector General follow-ups with these same 25 overburdened communities](#). This page linked to additional status reports that described technical analyses and outreach for these communities (such as [this one for a facility in New Castle, Delaware](#)). The deletion of these pages prevents commenters with lived experiences in these communities from referencing historical information about their localities and from citing these resources within their public comments.

The final category of removed pages previously provided information about regulatory actions related to EtO. Information about the [EPA's 2024 Final Rule](#) was removed or made more difficult to access,<sup>6</sup> as demonstrated by the removal of the "[Final Amendments to Strengthen Air Toxics Standards for Ethylene Oxide Commercial Sterilizers](#)" page. This page previously linked to more detailed information about the 2024 rule, including the regulatory impact analysis, rule history, a fact sheet, and an overview of the rule. While some of these pages are still online, they are more difficult to access due to the removal of one of the homepages from which they were accessible. Finally, a page with information about a [final rule to reduce emissions of EtO and chloroprene](#) was removed, limiting access to related resources such as regulatory documents, fact sheets, and related web pages. Without this information, commenters cannot reference the regulatory history of the chemical, preventing them from easily accessing and analyzing the several iterations of EtO regulation.

The removals detailed above are comprehensive, and have outsized implications for the ability to write public comments on the proposed rule. Below we provide a list of relevant webpages that were removed from EPA's website. Note that this list does not include pages that have been made less accessible via the deletion of pages previously linking to them.

The following resources all contained information about EtO, its risks, and EPA's efforts to address them:

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<sup>6</sup> US EPA, "National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review," Federal Register, April 5, 2024, <https://www.federalregister.gov/documents/2024/04/05/2024-05905/national-emission-standards-for-hazardous-air-pollutants-ethylene-oxide-emissions-standards-for>.

- [Hazardous Air Pollutants: Ethylene Oxide](#)
- [Ethylene Oxide \(EtO\) Risks and Your Health](#)
- [Ethylene Oxide \(EtO\) Explained](#)
- [Our Current Understanding of Ethylene Oxide \(EtO\)](#)
- [Actions to Protect Communities and Workers from Ethylene Oxide \(EtO\) Risk](#)
- [What EPA Is Doing to Address Ethylene Oxide \(EtO\) and to Learn More About the Chemical](#)
- [Additional Questions about Ethylene Oxide \(EtO\)](#)
- [Federal Partnerships Related to Ethylene Oxide \(EtO\)](#)
- [Contact Us About Ethylene Oxide](#)

The following pages provided community-level information about EtO, including community outreach, specific facility information, state-specific pages, and status reports:

- [Community Engagement on Ethylene Oxide \(EtO\)](#)
- [Ethylene Oxide \(EtO\) Public Webinars](#)
- [Pre Proposal: Outreach to Communities on Ethylene Oxide Commercial Sterilizers Fact Sheet](#)
- [Lakewood, Colorado \(Terumo BCT Sterilization Service, Inc.\)](#)
- [Groveland, Florida \(International Sterilization Laboratory\)](#)
- [Taunton, Massachusetts \(Professional Contract Sterilization, Inc.\)](#)
- [Hanover, Maryland \(Elite Spice, Inc.\)](#)
- [Allentown, PA \(B Braun Med Inc.\)](#)
- [Jessup, Maryland \(Elite Spice, Inc.\)](#)
- [Salisbury, Maryland \(Trinity Sterile, Inc.\)](#)
- [Jackson, Missouri \(Midwest Sterilization Corporation\)](#)
- [Columbus, Nebraska \(Becton Dickinson Pharmaceutical Systems\)](#)
- [Franklin, New Jersey \(Cosmed Group Inc. \(dba Cosmed of NJ\)\)](#)
- [Linden, New Jersey \(ETO Sterilization-Plant #2\)](#)
- [Queensbury, NY \(Sterigenics US LLC - Kingsbury\)](#)
- [Ardmore, Oklahoma \(LEMCO Ardmore\)](#)
- [Erie, Pennsylvania \(Cosmed Group LLC/Erie\)](#)
- [Zelienople, Pennsylvania \(American Contract Systems Inc.\)](#)
- [Añasco, Puerto Rico \(Edwards Lifesciences\)](#)
- [Fajardo, Puerto Rico \(Customed, Inc.\)](#)
- [Salinas, Puerto Rico \(Steri-Tech, Inc.\)](#)
- [Villalba, Puerto Rico \(Medtronic PR Operation Co.\)](#)

- [New Tazewell, Tennessee \(DeRoyal Industries\)](#)
- [Memphis, Tennessee \(Sterilization Services of Tennessee\)](#)
- [Athens, Texas \(Steri-Tech, Inc.\)](#)
- [Laredo, Texas \(Midwest Sterilization Corporation\)](#)
- [Sandy, Utah \(BD Medical\)](#)
- [Henrico, Virginia \(Sterilization Services of Virginia\)](#)
- [Ethylene Oxide Commercial Sterilization Facilities](#)
- [Inspector General follow-up: Ethylene Oxide](#)
- [Status Report - Terumo Lakewood, CO](#)
- [Status Report - Croda New Castle, DE](#)
- [Status Report - Sterigenics Smyrna, GA](#)
- [Status Report - BD Covington, GA](#)
- [Status Report - Medline Waukegan, IL](#)
- [Status Report - Sterigenics US LLS Willowbrook, IL](#)
- [Status Report- BCP Ingredients, St. Gabriel, LA](#)
- [Status Report - Taminco US St. Gabriel, LA](#)
- [Status Report - Air Products Performance Manufacturing Inc. Reserve, LA](#)
- [Status Report - Sasol Chemicals Lake Charles Westlake, LA](#)
- [Status Report - Union Carbide St. Charles Operations Taft, LA](#)
- [Status Report - Viant Grand Rapids, MI](#)
- [Status Report - Midwest Sterilization Jackson, MO](#)
- [Status Report - BCP Ingredients Verona, MO](#)
- [Status Report - Sterigenics Santa Teresa, NM](#)
- [Status Report - Braun Medical Allentown, PA](#)
- [Status Report - Edwards Lifesciences Añasco, PR](#)
- [Status Report - Lanxess Charleston, SC](#)
- [Status Report - Shell Technology Center Houston, TX](#)
- [Status Report - Midwest Sterilization Laredo, TX](#)
- [Status Report - Eastman Chemical Longview, TX](#)
- [Status Report - Indorama \(formerly Huntsman\) Port Neches, TX](#)
- [Status Report - Union Carbide Institute, WV](#)
- [Status Report - Union Carbide S. Charleston, WV](#)
- [Status Report - Evonik Milton, WI](#)

The following pages provided access to regulatory information on EtO:

- [Final Amendments to Strengthen Air Toxics Standards for Ethylene Oxide Commercial Sterilizers](#)
- [Final Rule to Strengthen Standards for Synthetic Organic Chemical Plants and Polymers and Resins Plants](#)

## II. Impacts of Information Suppression

The EPA website has been of the most accessible and comprehensive resources available for public commenters to understand information relevant to proposed rules. Given that federal websites are the main means of communication between the government and the public,<sup>7</sup> it is imperative that the information available on the EPA website about a rule the agency is proposing is accurate and complete. Several of the questions that EPA specifically seeks public comment on within the proposed rule necessitate information that was removed or made less accessible due to the webpage removals mentioned above. Below, we list the specific questions posed in the proposed rule that are more difficult to answer because of this information suppression, before providing more detail on exactly what information present on the suppressed pages would be necessary for answering these questions.

- Question #7: Should the EPA modify the emission reductions levels for new ARVs at facilities where EtO use is at least 10 tpy from 99.9 to 99.6 percent reduction, as proposed?
- Question #9: Should facilities have the option of using either parametric monitoring and performance testing or CEMS to demonstrate initial and continuous compliance with the Commercial Sterilization Facilities NESHAP, as proposed?
- Question #10: Should the EPA finalize the proposed changes to performance testing, parametric monitoring, and reporting requirements as proposed?
- Question #13: Should the EPA remove PTE requirements?
- Question #20: Should the EPA retain the compliance deadlines promulgated in the 2024 Final Rule for the section 112(d) standards as proposed?

In response to Question #7, information removals undermine the ability to comment on whether or not the EPA should modify emission reductions levels for new aeration room vents (ARVs) from a 99.9% to a 99.6% reduction. In the proposed rule, [the EPA justifies](#)

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<sup>7</sup> Donovan et al., “Policies for Federal Agency Public Websites and Digital Services, OMB Memorandum M-17-06.”  
[https://www.whitehouse.gov/wp-content/uploads/legacy\\_drupal\\_files/omb/memoranda/2017/m-17-06.pdf](https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2017/m-17-06.pdf)

[these proposed changes financially, by asserting that the cost-estimate completed in the 2024 rule didn't accurately reflect the lower cost of a 99.6% reduction.](#)<sup>8</sup> However, for commenters such as fenceline communities and facility workers, the risks associated with EtO and the difference in exposure to these risks from 99.9 to 99.6 percent emissions reduction is more relevant for answering this question than cost savings to facilities. As noted in the 2024 rule, a 99.9% versus 99.6% emissions reduction [“would further reduce the population exposed to risk levels greater than or equal to 1-in-1 million by additional 10,000-30,000 people.”](#)<sup>9</sup> Given these impacts of the proposed changes, public commenters may rely on information about the implications of these emissions, which was included on several removed pages, in their comments. For example, pages that described [EtO impacts on human health](#) as well as the importance of adequate ventilation and other safety protocols to mitigate harms to workers and communities would be relevant to commenters for answering Question #7, especially those living around the [25 facilities causing elevated risk to surrounding communities](#). Even more specifically, the EPA removed pages providing information about the [impacts of EtO emissions on communities and workers, which discussed the importance of the 2024 rule's emissions reductions actions](#) such as the choice to decrease ARV emissions by 99.9%. The excision of information from EPA's website about the risks of EtO thus undermines public commenters' abilities to incorporate these perspectives into their comments.

In response to Question #9 and Question #10, several removed pages provided information on the background and importance of the 2024 rules' changes to monitoring requirements, which is integral for responding to these two comments. For example, some removed pages provided [accessible information for understanding EtO air monitoring](#) efforts, with background information that is helpful– if not necessary for members of the public to understand the importance and impacts of EtO monitoring more broadly. A page about [EPA efforts to address and learn more about EtO](#) also provides information about air monitoring efforts to understand EtO emissions in communities, and it links to a more detailed [fact sheet about EPA's work to understand background levels of EtO](#) before explicitly linking these background air monitoring efforts to continuous emission

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<sup>8</sup> US EPA, “National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review Reconsideration,” Federal Register, March 17, 2026, <https://www.federalregister.gov/documents/2026/03/17/2026-05167/national-emission-standards-for-hazardous-air-pollutants-ethylene-oxide-emissions-standards-for#p-216>, 216.

<sup>9</sup> US EPA, “National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review,” Federal Register, April 5, 2024, <https://www.federalregister.gov/documents/2024/04/05/2024-05905/national-emission-standards-for-hazardous-air-pollutants-ethylene-oxide-emissions-standards-for#p-489>, 489.

monitoring systems (CEMS) by discussing real-time monitoring of EtO to assess risk to facility workers and communities. Perhaps the most significant removal of information relevant to Questions #9 and #10 is the removal of the page dedicated to [actions to protect communities and workers from EtO risk](#). This page provided specific information about EPA's implementation of CEMS, and its contribution to an overall decrease in cancer risk. Furthermore, it linked to another page for "[Final Amendments to Strengthen Air Toxics Standards for Ethylene Oxide Commercial Sterilizers](#)," which provided access to even more extensive information on these changes, as well as a page for "[Regulation of Ethylene Oxide \(EtO\) Under the Federal Insecticide, Fungicide, and Rodenticide Act](#)," which details changes to monitoring and other aspects of EtO regulations. These removals disrupt the commenting process by erasing background information needed to comment conclusively on CEMS and testing and reporting requirements.

In response to Question #10 and Question #13, information removals about the [toxicity of ethylene oxide](#) inhibit the public from assessing whether EPA should remove PTE requirements and whether facilities should be able to choose between performance testing and parametric monitoring or CEMS. If anything, [further research is necessary](#) to ensure that permanent total enclosures are effective in capturing all ethylene oxide emissions.<sup>10</sup> However, by removing general information about EtO, individuals lack the foundation to understand why capturing emissions are essential in the first place. With the removal of EPA's "[Actions to Protect Communities and Workers from Ethylene Oxide \(EtO\) Risk](#)" page, mentions of emissions capture systems like PTE we removed, leaving the public without knowledge of the prior steps EPA was taking to "decrease risk for workers who use EtO to sterilize products and equipment and for others who live, work, or go to school or daycare near sterilization facilities" through PTE. Without access to this historical information, individuals lack the full context to assess the proposed changes to performance testing, parametric monitoring, and reporting requirements, or why CEMS is needed and, thus, are unable to fully address PTE requirements in their public comments.

In response to Question #20, commenting on the removal of the risk-based standards under CAA section 112(f)(2), and the ensuing change in compliance deadlines requires an understanding of risk-based EtO standards, which is undermined by the removal of key EPA webpages. Given that risk-based standards are those designed to limit cancer and other risks to communities, facility workers, and other groups proximate to EtO facilities, an understanding of such risks and how they are impacted by a lack of risk-based standards is

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<sup>10</sup> Naveena Sadasivam, Lylla Younes, and Joaquín A Rosado Lebrón, "Why the EPA Is Relying on Unproven Technology to Stop Cancer-Causing Emissions," *Grist*, August 22, 2024, <https://grist.org/accountability/epa-ethylene-oxide-permanent-total-enclosure-pte-solution/>.

necessary for public comments on this question. On this point, not only did EPA [remove access to regulatory information](#), but in doing so also restricted access to linked [pages that discussed risk assessment and risk-based standards](#) in detail. Specifically, similarly to the resources relevant to answering Question #7, pages that discussed EtO [risks to the health of workers and surrounding communities](#) directly undermine public comments on Question #20.

The removal of pages about specific EtO facilities, including pages about the facility itself and surrounding communities, is also directly related to Question #20 and thus undermines public comments on this question. For example, several pages with information about [community engagement](#), including [webinars](#) and [other outreach](#) with communities surrounding EtO facilities and with elevated risk, were removed. The main page for community engagement also linked to detailed pages about each of the 25 communities that EPA's 2018 National Air Toxics Assessment (NATA) identified as having the highest risk from EtO emissions. As one example, this page about a [facility in Lakewood, Colorado](#) provides details about the community surrounding the facility, and even includes a data visualization of cancer risk posed by the facility. Furthermore, this page about an [Inspector General Follow-Up](#) linked to pages with even more information about community outreach and information sharing with these 25 communities (e.g. [this page for a facility in Taft, Louisiana](#)). Community information and outreach materials are key resources that impacted individuals could have utilized in their public comments, the removal of these resources prevents them generally from citing detailed information, and specifically from answering Question #20.

On a broader scale, these alterations and removals, along with the EPA's larger web presence about the proposed rule, distort the public's perception of ethylene oxide's risks, and falsely frame the proposed rule as a public health win while actively suppressing scientifically proven claims about risks to human and environmental health. They work to destabilize the scientifically supported understanding of EtO's risks, despite research under both Republican and Democratic administrations identifying the chemical as a carcinogen: The [Trump Administration acknowledged the chemicals' risks](#) in a 2018 assessment that found that ethylene oxide was a major driver of elevated cancer risk.<sup>11</sup> In several news releases and public communications across EPA's website, the agency frames the proposed rule as a win for public health, stating that it is "[Safeguarding the Supply of Life-Saving Medical Tools](#)." Meanwhile, the only recognition of the EPA's current web presence comes

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<sup>11</sup> US EPA, "2014 National Air Toxics Assessment: Fact Sheet," Environmental Protection Agency, accessed May 1, 2026, [https://www.epa.gov/sites/default/files/2018-08/documents/2014\\_nata\\_overview\\_fact\\_sheet.pdf](https://www.epa.gov/sites/default/files/2018-08/documents/2014_nata_overview_fact_sheet.pdf).

from the statement that “EPA is focused on taking actions that will save lives and protect Americans from unnecessary EtO exposure,” a claim that is completely unsupported by recent agency actions and the proposed rule in question. A narrative that ignores ethylene oxide’s dangers misrepresents the tradeoffs between the use and control of ethylene oxide, and the regulation necessary to strike this balance.

The timing of this information suppression with the proposed rule’s public comment period directly undermines participatory democracy by disrupting the public’s ability to analyze all the relevant resources necessary to engage with the notice-and-comment rulemaking process. The information EPA removed about ethylene oxide has outsized implications for communities’ ability to assess their own exposure and advocate for better protections, especially during this comment period. For this reason, we request the EPA to restore the previously available ethylene oxide pages on its website, and provide opportunity for public comments on the proposed rule that are not restricted by a lack of relevant information provided by the Agency.

## C. Ignoring the Research

In response to Question #3 (Is there new information that could be used in dose-response modeling, such as epidemiological studies of cancer in humans exposed to EtO?) and Question #5 (Is there new information related to human exposure to EtO, including information on occupational, smoking, background or endogenous exposures that may be relevant to estimating the dose-response relationship of EtO carcinogenicity?), EPA concluded in 2024 that ethylene oxide is [60 times more toxic](#) than had been previously determined and that individual cancer risk could be as high as [8,000-in-1 million](#) with existing emissions estimates.<sup>12,13</sup> The 2024 rule also [analyzed environmental justice implications](#) and found that communities closest to the emitting facilities had higher proportions of residents from minority groups, people living below the poverty line, or individuals living in linguistic isolation compared to the national average.<sup>14</sup>

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<sup>12</sup> Union of Concerned Scientists, “Trump Administration Rolls Back Safeguards Limiting Release of Cancer-Causing Air Pollutant Ethylene Oxide,” Union of Concerned Scientists, March 13, 2026, <https://www.ucs.org/about/news/trump-administration-rolls-back-ethylene-oxide-rules>.

<sup>13</sup> US EPA, “National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review,” Federal Register, April 5, 2024, <https://www.federalregister.gov/d/2024-05905/p-171>, 171.

<sup>14</sup> US EPA, “National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review,” Federal Register, April 5, 2024,

In the United States and Puerto Rico, [more than 14 million people live within five miles of ethylene oxide facilities](#).<sup>15</sup> According to analysis by the Union of Concerned Scientists there are also several examples of “hotspots,” or communities located within five miles of two or more commercial sterilizers. The study showed that [28% of commercial sterilizers are located in such hotspots](#),<sup>16</sup> which means individuals in these communities face multiple sources of EtO. EPA does not account for these cumulative exposures in the proposed rule.

The FDA also still actively notes efforts to find innovative alternatives for medical device sterilization, which would involve [“lower levels of currently used agents and employ new agents or alternatives, while maintaining device safety and effectiveness.”](#)<sup>17</sup> The CDC also continues to point out the carcinogenic effects of ethylene oxide, citing occupational studies indicating that people with repeated elevated ethylene oxide exposures are at [“increased risk of lymphohematopoietic cancers, including non-Hodgkin lymphoma, myeloma, and lymphocytic leukemia.”](#)<sup>18</sup> Specifically for children, CDC notes that they “may be at a higher risk of health effects” as a result of incomplete development of detoxification pathways, higher respiratory rate, time spent outdoors, etc., and that studies on animals have demonstrated sensitivities of a developing fetus from ethylene oxide exposure. Furthermore, the [CDC’s Clinician Overview on Ethylene Oxide](#) underscores that even at the lowest threshold, reports have demonstrated harmful side effects from short-term exposure to ethylene oxide including neurological effects, respiratory irritation, and ocular effects.<sup>19</sup>

As a result, in answering Question #3 and Question #5, we hold that the research points to occupational and geographic exposures not considered in the proposed rule are extremely relevant in estimating the dose-response relationship of EtO carcinogenicity.

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<https://www.federalregister.gov/documents/2024/04/05/2024-05905/national-emission-standards-for-hazardous-air-pollutants-ethylene-oxide-emissions-standards-for#p-644>, 644.

<sup>15</sup> Union of Concerned Scientists, “Ethylene Oxide Frequently Asked Questions Invisible Threat, Inequitable Impact,” Union of Concerned Scientists, February 2023, <https://www.ucs.org/sites/default/files/2023-02/Invisible-Threat-Inequitable-Impact-fact-sheet.pdf>.

<sup>16</sup> Darya Minovi, “Invisible Threat, Inequitable Impact,” Union of Concerned Scientists, February 7, 2023, <https://www.ucs.org/resources/invisible-threat-inequitable-impact?read-online-content=1>.

<sup>17</sup> US Food and Drug Administration, “Sterilization for Medical Devices,” U.S. Food and Drug Administration, accessed May 1, 2026, <https://www.fda.gov/medical-devices/general-hospital-devices-and-supplies/sterilization-medical-devices>.

<sup>18</sup> Centers for Disease Control and Prevention, “Clinician Brief: Ethylene Oxide,” Centers for Disease Control and Prevention, January 9, 2024, <https://www.atsdr.cdc.gov/environmental-medicine/hcp/clinicianbriefeto/index.html>.

<sup>19</sup> Centers for Disease Control and Prevention, “Clinician Overview: Ethylene Oxide,” Centers for Disease Control and Prevention, February 29, 2024, <https://www.atsdr.cdc.gov/environmental-medicine/hcp/emhsis/clinician-overview-ethylene-oxide.html>.

## D. Conclusion

The Environmental Data and Governance asserts that the removal and restriction of access to resources relevant to the EPA's proposed rule undermines the notice-and-comment rulemaking process by restricting commenters' ability to account for the harms, risks, and impacts of ethylene oxide in their comments. By removing EPA webpages that discuss risks of the EtO to human and environmental health and how to mitigate them; EtO facilities located in communities with high risk and federal efforts to mitigate harms from these facilities; and the regulatory history of EtO, the agency is undermining the public's ability to provide evidential claims in their public comments. Through its removal and limitation of this essential ethylene oxide information, EPA has turned its back on the responsibility to facilitate meaningful public comment on the proposed rule. As such, we urge the EPA to restore access to these resources in order to hold a fair and just public comment period for this proposed rule.

In addition to the extensive removal of information about ethylene oxide across the EPA's website, the Agency also disregards extensive scientific evidence from government and independent bodies that underscores the harmful effects of ethylene oxide on human health. We maintain that a complete analysis of this information is necessary to consider as the Agency develops regulations for this chemical. As a result, we urge the EPA to fulfill its responsibility to protect human and environmental health by conducting a complete and thorough analysis of the scientific evidence on the risks and harms of ethylene oxide.