



The Ethylene Oxide Sterilization Association, Inc.

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January 17, 2024

Submitted via OEHHA Website: <https://oehha.ca.gov/comments>

Esther Barajas-Ochoa
Office of Environmental Health Hazard Assessment
P. O. Box 4010
Sacramento, California 95812-4010

RE: Comments on Modification of Proposed No Significant Risk Levels (NSRLs) for Ethylene Oxide

Dear Ms. Barajas-Ochoa:

On behalf of its members, the Ethylene Oxide Sterilization Association, Inc. (EOSA) submits this letter to support and incorporate by reference the comments submitted by the American Chemistry Council (ACC) and the American Spice Trade Association (ASTA) regarding California Office of Environmental Health Hazard Assessment's (OEHHA) Modification to the Proposed Proposition 65 No Significant Risk Levels (NSRLs) for ethylene oxide (EtO) announced on December 19, 2023. The modification is the addition of a newly derived proposed NSRL of 1.5 micrograms per day ($\mu\text{g}/\text{day}$) specifically for oral exposures.

EOSA is comprised of the leading experts of the medical device manufacturing and sterilization industry. In addition to medical device manufacturers, EOSA members include manufacturers of emissions control equipment, ethylene oxide sterilizers, and ethylene oxide detection systems. EOSA members also include many contract sterilization providers, sterilization consultants, environmental consultants, and registrants.

EOSA urges OEHHA to consider the comments submitted by ACC and ASTA.

Sincerely,

A handwritten signature in blue ink, appearing to read "Meibao Zhuang", is written over a light blue horizontal line.

Meibao Zhuang
Senior Manager
The Ethylene Oxide Sterilization Association, Inc.