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**MSC**

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**MIDWEST STERILIZATION CORPORATION**

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November 10, 2014

Mr. Aaron Yeow  
Designated Federal Officer  
Science Advisory Board Staff Office  
U. S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N. W.  
Washington, D.C. 20460-4164

Re: Midwest Sterilization Corporation's comments to the Chemical Assessment  
Advisory Committee for the Integrated Risk Information System Evaluation of the  
Inhalation Carcinogenicity of Ethylene Oxide (Revised External Review Draft -  
August 2014)

Dear Mr. Yeow:

Midwest Sterilization Corporation (MSC) appreciates the opportunity to submit these comments to the Science Advisory Board's Chemical Assessment Advisory Committee (CAAC) for consideration in responding to the draft charge questions for the revised draft Integrated Risk Information System (IRIS) assessment for ethylene oxide (EO). MSC provides contract ethylene oxide sterilization services to medical device manufacturers, and as such, is extremely interested in promoting the safe use of EO.

MSC has significant concerns regarding the U.S. Environmental Protection Agency's cancer risk estimates for EO and fully supports all comments submitted by the American Chemistry Council (ACC) and the Ethylene Oxide Sterilization Association, Inc (EOSA) regarding such risks.

MSC believes the current draft IRIS assessment grossly exaggerates the EO cancer risk estimates and will have significant adverse impacts on those who use EO to sterilize healthcare products, the healthcare community at large, and to public health. We urge the CAAC to fully review the comments submitted by the ACC EO Panel and EOSA as it develops draft responses to the charge questions.

Sincerely,

Doug Tropf  
Regulatory Affairs Manager