

FACTS About BD Operations in Georgia

BD's roots in Covington extend back to 1967, when C. R. Bard constructed a 100,000 square-foot manufacturing facility to produce urological products, such as urinary catheters. Today, it is home to a BD distribution center, a BD sterilization facility and BD Urology and Critical Care, a business focused on solutions that advance the world of health in the categories of acute urology, endourology, targeted temperature management and home care. As an industry, and within BD, we have subject matter experts who work each day to carry out our commitment to the safe use of EtO in our sterilization operations. There are several indisputable and validated facts about BD's Covington and Madison sterilization facilities that employees, community members and other stakeholders should know to help understand the safety of these operations.

FACT: Ethylene oxide (EtO) emissions at BD Covington and Madison are well within state and federal government standards defining "acceptable risk levels" to protect human health.

U.S. Environmental Protection Agency (EPA) has stated:

- EPA's evaluation of Georgia's recent modeling analyses from these two facilities indicates that risk for EtO concentrations in residential areas does not exceed 100-in-1 million (1 in 10,000), which EPA uses in regulations as a general guide for determining the maximum acceptable lifetime cancer risk.
- Upon closer examination, emissions at the BD facility in Covington, GA, are less than those used to develop the 2014 National Air Toxics Assessment (NATA), and EtO levels in Covington were not likely high enough to cause immediate harm to health.

Georgia Environmental Protection Division has stated:

- BD and Sterigenics are in compliance with current federal requirements for control of ethylene oxide emissions. Also, both facilities are currently emitting significantly less ethylene oxide than assumed in the 2014 NATA.
- BD facilities conduct periodic testing of their emission control technology, which is monitored by EPD.

Georgia Department of Public Health has stated:

- It is extremely difficult to find out if an environmental exposure has caused cancer. The department says its data shouldn't be seen as a link between any particular environmental exposure and a specific type of cancer.

FACT: BD uses the best available technology to reduce EtO emissions and operates under a philosophy of continuous improvement to further reduce EtO emissions.

- BD uses best available control and capture technology in Covington and Madison that makes these facilities among the most effective in the industry at removing EtO emissions.
- BD has confirmed it will implement additional voluntary improvements to further reduce emissions in Covington and Madison.
 - To achieve this, BD is working with industry partners and Georgia EPD to discover new system and process innovations that will further reduce EtO emissions at our facilities, which the company plans to implement as soon as designs are finalized and approved through the appropriate permitting processes.
- BD's philosophy of continuous improvement includes periodic upgrades when new technology controls or process innovations are discovered to ensure a safe environment for employees and surrounding communities:
 - 1991-2000: Built current sterilization facility in Covington, which eliminated the use of Freon-12 to eliminate CFC emissions; installation of a regenerative thermal oxidizer to achieve greater than 99.95% EtO destruction; and capturing back vent exhaust. BD continued to capture back vent exhaust, even as U.S. EPA rescinded this requirement.
 - 2001-present: Implementation of process improvements to reduce the use of EtO; control upgrades for enhanced monitoring and control; and further process adjustments for improved removal of EtO.
- BD's Madison facility was built in 2006 with latest technologies and processes as used in the Covington facility.

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FACT: BD meets or exceeds local, state and federal ethylene oxide emission requirements at Covington and Madison.

- The BD facilities in Covington and Madison achieve greater than 99.95% destruction of ethylene oxide in our plant emissions, which is better than the legal requirement of 99% and results in emissions significantly below maximum allowable levels by permitting.
- BD verifies the effectiveness of emission destruction through stack testing (conducted by an independent third-party), in accordance with permit requirements.

FACT: BD works closely with local, state, and federal agencies to ensure its operations meet or exceed all government requirements for emission controls and reporting of emission data.

- BD is in full compliance with laws and regulations surrounding the safe use of EtO.
- All BD facilities have permits for EtO emissions, and BD operates well below the threshold allowed by those permits.
- BD uses independent, third-party companies to test the effectiveness of our emission control technology to ensure the safety of our operations.
- We employ monitoring inside our facilities to ensure the safety of our employees and in compliance with Occupational Safety and Health Administration (OSHA) regulations.

FACT Check: WebMD and Georgia Health Story on Ethylene Oxide

A recent media story from WebMD and Georgia Health News contained information about our Covington facility that was not accurate. As part of our commitment to transparency and to the well-being of our communities in which we operate, it is important for us to correct misreporting and provide factual information about the company.

- The story cited NATA (National Air Toxics Assessments) data that estimates that ethylene oxide causes 214 cases of cancer in Covington for every million people exposed. This has been refuted by the U.S. EPA.
 - The U.S. EPA issued a statement to clarify that EPA's evaluation of Georgia's recent modeling analyses indicates that risk for EtO concentrations in residential areas does not exceed 100-in-1-million, which EPA uses in regulations as a general guide for determining the maximum acceptable lifetime cancer risk.
 - The EPA also stated that, upon further examination, emissions at the BD facility in Covington, GA, are less than those used to develop the 2014 NATA.
- The story stated multiple times that EtO emissions in the Covington area exceeded the state's annual levels. This has been refuted by the Georgia EPD.
 - Georgia EPD stated that both BD and Sterigenics are in compliance with current federal requirements for control of ethylene oxide, and both facilities are currently emitting significantly less ethylene oxide than assumed in the 2014 NATA.
- Throughout the story, specific cancer patients were inferred to have contracted cancer from ethylene oxide. There is no factual basis for this claim, which is not supported by the Georgia Department of Health or the U.S. EPA.
 - The Georgia Department of Public Health cautions that it is extremely difficult to find out if an environmental exposure has caused cancer. The department adds that its data shouldn't be seen as a link between any particular environmental exposure and a specific type of cancer.
 - The U.S. EPA has noted that EtO levels in Covington and Smyrna were not likely high enough to cause immediate harm to health.