



**Sam Khichi**  
EVP, General Counsel,  
Public Policy & Regulatory Affairs

1 Becton Drive  
Franklin Lakes, NJ 07417  
201.847.3223 (t)  
201.847.5361 (f)

August 20, 2019

*Via Hand Delivery*

The Honorable Brian Kemp  
Governor  
206 Washington Street  
Suite 203, State Capitol  
Atlanta, GA 30334

RE: Becton Dickinson & Company Covington and Madison Facilities

Dear Governor Kemp,

We have a very personal commitment to ensuring a safe environment for our employees and our neighbors. BD's commitment to safety extends equally to our employees, our communities and the patients we serve with our medical devices. As part of our commitment to safety, BD's Global Environmental Health and Safety standards ensure that all BD facilities are designed and operate with a high level of process safety and environmental controls. We invest in and deploy best available air pollution control technology at our facilities to achieve greater than 99.95% destruction of EtO in our plant stack emissions. Federal and state regulations only require 99% destruction of stack emissions, but independent stack testing has verified greater than 99.95% destruction efficiency from BD's sterilization operations, enhancing the protection of the safety of our employees and communities.

As a result of these ongoing efforts and investment, BD continually exceeds all local, state and federal ethylene oxide emission standards in Covington and Madison, including the National Emission Standards for Hazardous Air Pollutants (NESHAP), and our EtO levels are well below requirements under the Clean Air Act. BD is fully compliant with regulations from U.S. EPA, Georgia EPD, OSHA and FDA, and BD has a history of investing in safety for employees and the community, beyond what the law requires.

BD strives to be an industry leader in environmental, health and safety as well as in the design and manufacture of innovative medical devices. As part of our standard process to constantly improve our systems and controls, we commit to implement the following improvements to reduce further our facility emissions to a level that is well below what the

law or our existing permit requires. These improvements and the timelines were reviewed and discussed with EPD on Friday, August 16.

We will implement these actions and improvements as quickly as possible pursuant to a modified air permit application we are working to submit to EPD.

**Additional Emission Control Improvements Schedule – BD Facility, Covington, GA**

Task 1 – Conduct updated stack test in Covington to confirm EtO destruction efficiency of RTO; test to be conducted September 9 through September 20, depending on availability of stack test team from independent third-party firm recognized by EPD. The protocol will be submitted to EPD 5-10 business days prior to scheduled test. Results to be submitted to EPD as soon as possible after completion of test (estimated thirty to forty-five days after completion of test) on or before October 31, 2019.

Task 2 – Evaluate options for proposed reactive dry bed system to control fugitive emissions of EtO, prepare preliminary design of system, model effectiveness of proposed controls, and prepare and submit permit application to EPD for installation of dry bed system and any other fugitive emission control enhancements (approximately eight to twelve weeks) on or before October 31, 2019.


Task 3 – Order equipment for control of fugitive emissions of EtO (approximately two to four weeks after receipt of permit from EPD).

Task 4 – Install equipment for control of fugitive emissions of EtO (approximately twenty-six to forty weeks after receipt of permit from EPD), depending on equipment vendor lead time.

Task 5 – If needed, based upon results of EtO destruction efficiency test identified in Task 1, prepare and submit application to reduce ambient impact of emissions of EtO following the RTO. Dates for submission of any permit application and other activities that may be needed will be arranged after consultation with EPD and will be determined based upon the degree of EtO destruction efficiency enhancements that may be needed or other possible EtO emission enhancements that may be identified.

We will continue to work closely with EPD to ensure these tasks are completed timely and will provide status updates for the community on BD's website.

Sincerely,



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