



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Air Protection Branch

4244 International Parkway
Suite 120
Atlanta, Georgia 30354
404-363-7000

March 31, 2020

Submitted electronically

Mr. John LaMontagne
Becton, Dickinson and Company
8195 Industrial Blvd
Covington, GA 30014

Re: Performance Test Plan for Fugitive Emissions
Control System Upgrades
Test Date: April 2, 2020

Dear Mr. LaMontagne:

The Environmental Protection Division has completed its review of the test plan for the Fugitive Emissions Control System Upgrades submitted on February 29, 2020, and amended on March 27, 2020. Testing was originally scheduled for March 31, 2020, but has been postponed to April 2, 2020, due to weather concerns. The originally submitted test plan stated that sampling and analysis would be conducted at a single point for each inlet and outlet stack into Summa Canisters and analyzed according to EPA Method TO-15. Each sample would be collected for 4 hours. During sampling, airflow and moisture measurements will be taken.

In addition, the amended test plan included the specifications that duplicate samples will be collected at each outlet stack and one of those duplicate samples will be spiked in the laboratory with a standard concentration of ethylene oxide to ensure precision and accuracy of the analysis. Also, the sample lines will consist of the tubing stock that was tested by Eurofins and demonstrated minimal to no sample loss in the lab. Sample lines will not exceed five feet in length.

Based on the information provided in test plan submitted March 27, 2020, the Division approves the procedures contained therein. If you have any questions regarding test procedures and requirements, please contact Dan McCain at 404-363-7120 or daniel.mccain@dnr.ga.gov.

Sincerely,

Sean Taylor
Program Manager
Stationary Source Compliance Program