

**Richard E. Dunn, Director**

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**Air Protection Branch**  
4244 International Parkway  
Suite 120  
Atlanta, Georgia 30354  
404-363-7000

**June 15, 2020**

**Submitted electronically to Boone.Brothers@bd.com**

Boone Brothers  
Sr. EHS Manager  
Becton, Dickinson and Company  
8195 Industrial Blvd  
Covington, GA 30014

Re: Ethylene Oxide Performance Test  
Dry Bed System 1 (SYS1)

Dear Mr. Brothers:

The Industrial Source Monitoring Unit (ISMU) has completed the review of the April 2, 2020, performance test conducted on Dry Bed System 1 at Becton, Dickinson and Company (BD) in Covington, Georgia. The performance testing was conducted to comply with a Georgia Environmental Protection Division Consent Order dated October 28, 2019.

The test report indicated that ethylene oxide (EtO) emissions at the outlet of the control device were higher than at the inlet, resulting in a negative removal efficiency. Even though the outlet emission rate was still overall low, due to the unusual nature of the removal efficiency results, we are labeling the test results Indeterminate for the intended purpose.

A retest of Dry Bed System 1 should be conducted within 30 days of the date of this letter. If you have any questions regarding test procedures and requirements, please contact Joshua Pittman at 404-363-7139 or [joshua.pittman@dnr.ga.gov](mailto:joshua.pittman@dnr.ga.gov).

Sincerely,



Sean Taylor  
Program Manager  
Stationary Source Compliance Program

cc: Stephen Damaske

Enclosure