



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

July 02, 2020

Submitted electronically to Boone.Brothers@BD.com

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

RE: Incident Reports Dated May 28, 2020, and May 29, 2020

Dear Mr. Brothers:

This letter serves as a response to the follow up incident reports submitted to the Division on May 28, 2020, and May 29, 2020, for unpermitted releases of ethylene oxide (EtO) from the Beckton, Dickinson and Company (BD) Madison facility. Paragraph 2 in Attachment A to the Consent Order signed on October 28, 2019, required all unpermitted releases of ethylene oxide (EtO) at the BD Covington facility and the BD Madison facility, no matter the amount of the release, to be reported to EPD immediately by email with a follow up report within 48 hours. The follow up incident reports emailed to EPD on May 28 and May 29, 2020, both indicated that the releases occurred after maintenance had been performed on pressure relief valves in the system. Follow up from a previous incident on March 3, 2020, at the Covington facility indicated that construction had recently been completed in the area. Another incident on April 19, 2020, was caused by build up of construction debris on the air filters. This pattern of incidents surrounding maintenance and construction work suggests that further steps need to be taken to minimize releases in the future.

It is the Division's assertion that during periods of construction and maintenance more care should be taken in verifying the reliability of EtO control and containment systems. The Division is requesting that BD update the Leak Detection and Repair programs for BD Madison and BD Covington to include pressure testing with soap any connection that was repaired before initial EtO usage or performing LDAR on the line during the first run with EtO present if the line is not able to be pressurized before usage.

Within 15 business days of receipt of this letter, please submit to the Division a revised LDAR protocol for the BD Madison and Covington facilities implementing the requested upgrades to the program. If you have any questions or comments concerning this letter, please contact me at 404-363-7067 or Stephen.Damaske@dnr.ga.gov.

Sincerely,

Stephen Damaske
Air Toxics Unit Manager
Stationary Source Compliance Program

AIRS Nos. 217-00021
211-00021