



MEMORANDUM

Date: April 13, 2022

To: The Honorable Chair and Members
Pima County Board of Supervisors

From: Jan Leshner 
County Administrator

Re: **Update Regarding Becton, Dickinson and Company Air Quality Permit**

I last updated the Board of Supervisors on the status of the Becton, Dickinson and Company (BD) Air Quality Permit on [February 15, 2022](#). Since that update, the Pima County Department of Environmental Quality (PDEQ) has continued working with the Environmental Protection Agency (EPA) to update the draft permit to address input from various public agencies and the public.

The most recent proposed permit has been reviewed by EPA and their recommendations to install a continuous emissions monitoring system (CEMS) have been incorporated. The use of a CEMS increases the measurement of the emissions at least 8,000 times more than originally proposed, providing a much more robust and statistically defensible measurement, monitoring, and accounting of the emissions within the permit limits.

Incorporating a CEMS directly addresses stated concerns of the community and Board of Supervisors that the facility operate within the predetermined limits necessary to safeguard the health of the community. The addition of a CEMS, versus the previously proposed monitoring, is minimal in relation to the overall cost of constructing and operating the plant. CEMS is a reasonable requirement when weighed against the benefits it provides in safeguarding the community from harmful pollutants.

Additionally, throughout the permit, the referenced monitoring of emissions "hourly" has been replaced by "continuous" monitoring of emissions. The continuous emissions language now includes sunset provisions to switch to the EPA's new performance standard when one is finalized. PDEQ has also directly tied in the continuous emissions monitoring provisions to demonstrating compliance with the emissions limitation cap.

Furthermore, PDEQ has addressed the control of emissions related to equipment leaks by requiring establishment of leak detection and repair (LDAR) work practices. Any component subject to LDAR requirements must be monitored at specified, regular intervals to determine whether it is leaking. Leaking components must be repaired or replaced within specified timeframes. Any monitored amounts from leaks count towards the permit emissions cap. The LDAR practices are required to be included in the facility Building Management System and Operation and Maintenance Plan. This approach is similar to how the Food and Drug

The Honorable Chair and Members, Pima County Board of Supervisors
Re: **Update Regarding Becton, Dickinson and Company Air Quality Permit**
April 13, 2022
Page 2

Administration requires industries to establish operational and maintenance work practices related to health and safety.

The proposed permit with the above mentioned components is currently being reviewed with EPA and BD. PDEQ expects to finalize the permit within the next weeks along with providing responses to all received comments.

JKL/anc

c: Carmine DeBonis Jr., Deputy County Administrator for Public Works
Francisco Garcia, MD, MPH, Deputy County Administrator and Chief Medical Officer
Health and Community Services
Terry Cullen, MD, Director, Health Department
Barbara Escobar, Interim Director, Department of Environmental Quality