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# MEMORANDUM

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Date: May 9, 2022

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

From: Jan Leshner   
County Administrator

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

I provided an update on [April 13, 2022](#) regarding the status of the air quality permit for Becton, Dickinson and Company (BD). The Pima County Department of Environmental Quality (PDEQ) has finalized the permit and addressed the comments received during the public comment period. The permit has been strengthened and expanded from the initial proposed draft to address concerns of the public, the Board of Supervisors and the Environmental Protection Agency (EPA). Specific key revisions include the following:

- Included continuous emissions monitoring and associated reporting and recordkeeping requirements.
- Added clarity in the permit and the operation and maintenance plan, to include enforceable provisions verifying the collection and treatment of fugitive emissions.
- Updated the Environmental Justice Analysis to better inform the community and local policymakers regarding the potential impacts from project emissions.

The final proposed documents were shared with EPA last week for review. EPA and BD have also been provided the draft PDEQ responses to comments for their review. Anticipated dates for actions to complete the permit are as follows:

- May 5, 2022 - Sent draft permit and Response to Comments (RTC) document to EPA and BD for review.
- May 10, 2022 - EPA and BD to provide a response on draft RTC document.
- May 12, 2022 - Issue invoice for permit pursuant to Pima County Code.
- May 16, 2022 - PDEQ to finalize permit documents for issuance. Send correspondence of decision to all stakeholders including EPA and post permit on PDEQ website.

JKL/anc

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