DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: On-site Inspection

A585867384				
FACILITY: Mead Johnson & Company, LLC		SRN / ID: A5858		
LOCATION: 725 E. Main Street, ZEELAND		DISTRICT: Grand Rapids		
CITY: ZEELAND		COUNTY: OTTAWA		
CONTACT: Matt Kwiatkowski, EHS Associate Manager		ACTIVITY DATE: 05/04/2023		
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR		
SUBJECT: FY'23 inspection to determine the facility's compliance status with applicable air quality rules and regulations including				
Renewable Operating Permit ROP-MI-A5858-2022.				
RESOLVED COMPLAINTS:				

A) Introduction

A FOFO07004

This report documents the May 4, 2023, onsite inspection of Mead Johnson & Company LLC. (Mead, SRN A5858) for the purpose of evaluating compliance with respect to all applicable state and federal air quality rules and reg. This inspection was conducted by Chris Robinson (CR) and Chukuemeka Oje (CO) from Michigan's Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD).

Mead is located in Ottawa County at 725 East Main Street Zeeland, Michigan. Weather conditions were cloudy with a temperature of approximately 50 degrees Fahrenheit and south-southwest winds at approximately 5 mph. (<u>www.weatherunderground.com</u>). Prior to entry CR and CO surveyed the perimeter of the facility for odors and visible emissions, none were observed. Staff then entered and met with Matt Kwiatkowski, Mead's Environmental Health and Safety Associate Manager, and informed him of the purpose of the visit. The ROP was discussed prior to the walkthrough. After the walk-through, observations were discussed and records were requested, which have been provided. During the pre-walkthrough meeting Mr. Kwiatkowski indicated that there have been no recent equipment/process modifications or additions, nor has there been any issues or major changes.

B) Facility Description

Mead is a manufacturer of powdered milk products for infants and seniors including products for people with special nutritional or medical needs. The manufacturing operations consist of combining and drying raw materials, which are then blended with vitamins and minerals before being weighed and packaged. The facility also has an onsite wastewater treatment plant. The facility has multiple sources of particulate material (PM) controlled by baghouses, rotoclones, or wet scrubbers.

Directly south of the site is a public athletic field, to the west are private residences, to the north, east and southeast are industrial facilities.

C) Regulatory Evaluation

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit of any single Hazardous Air Pollution (HAP) regulated by Section 112 of the federal Clean Air Act, is equal to or more than 10 tons per year (tpy) and/or the potential to emit of all HAPs combined is equal to or more than 25 tpy. The facility has taken practicably enforceable limits to restrict emission unit specific PTEs for NOx, SO2, VOCs, PM, PM2.5, and PM10. Based on the December 2021 PTE demonstration, the primary source for NOx emissions is from the facility's boilers which are limited to 66 tpy. An additional 28 tons per year have been calculated for the facility's engines/heaters and another 7.91 tons per year for HVAC (Total = 102 tons per year). Since this facility does not have any Source-wide restrictions, the NOx PTE exceeds the threshold for Title V (100 tons per year) by 2 tons, therefore, they are major for Nitrogen Oxides (NOx).

No emission units at the stationary source are currently subject to the Prevention of Significant Deterioration regulations of Part 18, Prevention of Significant Deterioration (PSD) of Air Quality of Act 451, because at the time of New Source Review (NSR) permitting the PTE of PM was less than 250 tpy.

EUBOILERNO1 and EUBOILERNO2 were installed prior to August 15, 1967. As a result, this equipment is considered "grandfathered" and is not subject to state NSR permitting requirements. However, future modifications of this equipment may be subject to NSR.

EU-FIREPUMP at the stationary source is subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for existing Compression Ignition Reciprocating Internal Combustion Engines (RICE) promulgated in 40 CFR Part 63, Subparts A and ZZZZ.

EUNG-GENERATOR and EUPROP-GENERATOR at the stationary source are subject to the NESHAP for existing stationary spark ignition RICE promulgated in 40 CFR Part 63, Subparts A and ZZZZ.

EUNG2-GENERATOR at the stationary source is subject to the New Source Performance Standards (NSPS) for new stationary spark ignition RICE promulgated in 40 CFR Part 60, Subpart A and JJJJ and the NESHAP for new stationary spark ignition RICE promulgated in 40 CFR Part 63, Subparts A and ZZZZ. However, compliance with 40 CFR Part 63, Subparts A and ZZZZ are demonstrated by complying with 40 CFR Part 60, Subpart A and JJJJ.

EUZSP-SPRAY-DRYER at the stationary source is subject to the NESHAP for the Maximum Achievable Control Technology (MACT) Standards for existing and new small (Heat Input capacity < 10MMBTU/hr.) boilers/process heaters promulgated in 40 CFR Part 63, Subparts A and DDDDD.

EUBOILERNO1, EUBOILERNO2, EUBOILERNO3, EUS-DRYER-HEATER, and EUN-DRYER-HEATER at the stationary source are subject to the NESHAP for the MACT Standards for existing and new large (Heat input capacity of 10MMBTU/hr. or greater) boilers/process heaters promulgated in 40 CFR Part 63, Subparts A and DDDDD.

EUBOWEN-DRYER, EUDIGEST-TANKS, EULIQUIFIER-TANK, EUZSP-LIQ-PROCESS, EUZSP-SPRAY-DRYER, FGZSP-BLEND-FILL (EUN-POWDER-BLEND, EUS-POWDER-BLEND, EUZSP-FILL-LINE), FGZIPP-PMSOURCES (EUCAN-FILL-LINE, EUN-BAG-LINE, EUS-BAG-LINE), FGNS-DRYERS (EUN-DRYER and EUS-DRYER), FGDRY-POWDER (EUDRY-POWDER1, EUDRY-POWDER2 have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring (CAM) rule pursuant to 40 CFR Part 64, because the units have potential pre-control emissions over major source thresholds. Particulate Matter from these emission units is controlled by individual baghouses. EUZSP-VIT-WEIGH and FGZIPP-PMSOURCES (EUZIPP-VIT-WEIGH & EU-ZIPP-MINORS-STATIONS) are not subject to CAM since they do not have potential pre-control emissions over major source thresholds.

D) Compliance Evaluation

All semi-annual reports have been submitted as required in Special Condition VII for each ROP Emission Unit and Flexible Group table. Deviations have been noted, see FCE report. Stack dimensions were not explicitly measured but appeared to meet the requirements outline in the ROP under SC VIII.

Per discussions and a review of records the facility is maintaining records for at least 5 years as required by the ROP.

Many of the ROP emission unit tables and Flexible group tables (Section I) include an hourly PM emission limit (lb./1,000 lb. exhaust air or pph) and/or percent opacity/visible emission limits. Compliance with any specified material type or usages along with proper operation and maintenance should ensure compliance with these emission limits. The facility appears to be conducting appropriate maintenance, which is being logged as required. Therefore, it appears that Mead is operating within these emission limits.

1) ROP-MI-A5858-2022

EUBOWEN-DRYER

A liquid product is atomized into a hot air stream to evaporate all moisture. The dried product is then recovered by the dryer and a multi-clone cyclone. PM emissions created during this process are controlled by a wet Scrubber which has a water flow switch installed that ensures a minimum water flow of 18gpm. If the switch detects a lower water flow, the entire process shuts down automatically. calibrations of the switch are required, and water flow readings are required to be taken once per month. This information was provided and is attached. The last calibration was conducted on November 28, 2022, and the minimum water flow reading while operating was 25.08gpm. All required preventative maintenance is being conducted properly. Therefore, it is assumed the facility is operating this emission unit within the specified emission limits of 0.02 lb. per 1,000 lbs. exhaust gas for PM.

EUDIGEST-TANKS

Emission records were provided. The condenser and associated equipment preventative maintenance is being conducted properly. Calibration information for the condenser flow switch and knock out pot level switch were provided. The condenser low flow switch was calibrated on September 5, 2022 and the toluene knockout pot level switch was calibrated on August 31, 2022.

Emissions of Volatile Organic Compound (VOC) from vents SV1-5 and SV7-9 is limited to 181.7 pounds per 24-hour period commencing each calendar day at 12:00 AM and 33.2 tons per 12-month rolling time period. The highest reported daily emissions of VOCs for the time period of January 1, 2022, through March 30, 2023, was 70.5 pounds with the highest 12-month rolling at 12.87 tons (Jan - Aug 2022).

Emissions of VOCs from steam ejector stack SV011 are limited to 96.4 lbs. per 24-hour period commencing each calendar day at 12:00 AM and 8.8 tons per 12-month rolling time period. The highest reported daily emissions of VOCs for the time period of January 1, 2022, through March 30, 2023, was 38.65 pounds and the highest 12-month rolling was 2.67 tons (March 2023).

A visual inspection was conducted with no obvious deficiencies identified. This emission unit is subject to CAM for VOC control, and all monitoring is being conducted to meet the requirements. The dry handling component of this emission unit is equipped with a

rotoclone wet scrubber. The rotoclone wet scrubber shall maintain a minimum water pressure of 23 psi. It was operating at approximately 70 psi during this inspection.

EUZSP-VIT-WEIGH

This process consists of a scale where dry materials are transferred into containers and weighed. PM emissions are controlled by a Torit dust collector with fabric filters that is equipped with a broken bag detector which is calibrated annually. The last calibration was conducted on August 28, 2023. All required preventative maintenance is being conducted properly.

EULIQUIFIER-TANK

This process involves mixing dry and liquid ingredients together. PM is controlled by use of a wet scrubber (Rotoclone), which is installed and is being maintained to ensure compliance with the emission limit specified in SC 1.1 of 0.04 pounds per 1,000 pounds exhaust gas. The scrubber is equipped with a switch to ensure that the water pressure does not drop below 23 psi. If it does the entire process shuts down.

The switch is calibrated semiannually, and the water pressure is recorded at least once per month. Records were provided for both. Based on the records provided the only time the pressure dropped below 23 psi was when the system was not operating which corresponds to the record pressure of approximately zero. The most recent calibration occurred on March 7, 2023.

EUZSP-LIQ-PROCESS

This emission unit includes equipment for liquefying and mixing dry powdered materials. PM emissions are controlled by a wet scrubber (Rotoclone), which is installed and is being maintained to ensure compliance with the emission limit specified in SC 1.1 of 0.04 pounds per 1,000 pounds exhaust gas. The scrubber is equipped with a flow transmitter to ensure that the water flow does not drop below 1.5 gpm. If it does the entire process shuts down.

The switch is calibrated semiannually, and the water pressure is recorded at least once per month. Records were provided for both. The most recent calibration was completed on October 25, 2022, and the system was operating at approximately 1.8gpm during the inspection.

EUZSP-SPRAY-DRYER (Sahara Dryer)

Spray dryer which consists of a natural gas fired process heater, spray drying operation, and spray dryer cleaning operations. PM emissions are controlled by a fabric filter baghouse which is installed and is being maintained to ensure compliance with the PM emission limit specified in SC 1.1 of 0.02 pounds per 1,000 pounds exhaust gas. This process is permitted to use no more than 167 pounds of sodium hydroxide per wash cleaning cycle in EUZSP-SPRAY-DRYER. Based on the attached records the facility only used 166 lbs. from January 1, 2022, through April 30, 2023, which is less than the amount allowed per wash.

The fabric filters are equipped with broken bag detectors to ensure proper control. If an alarm goes off indicating a potential leak, the entire process shuts down. The broken bag detector is calibrated annually. The last calibration was conducted on September 5, 2022, which is attached.

The maximum VOC 12-month rolling total for the same data set was 0.379 tons in March 2023, which is well under the ROP limit of 1.8tpy (based on a 12-month rolling time period). Emission calculations are attached.

FGNS-DRYER-HTRS

Two identical natural gas fired heaters used to produce a hot air stream for the north and south spray dryers. These heaters are restricted to combusting only natural gas, which they do.

FGBOILERS

FGBOILERS consists of two identical Erie City Company boilers that can be fired on both natural gas and fuel oil; and one Cleaver Brooks boiler firing natural gas exclusively. The facility has removed the related fuel oil tanks and associated piping from the area. While the internal fuel firing components are still present, the unit could be considered disabled for fuel oil use, however the company will continue to keep fuel oil as a back-up option in their ROP. The Cleaver Brooks boiler was installed in 2012 and is subject to 40 CFR 63 Subpart DDDDD. An initial notification report was received on May 28, 2013, and an initial boiler tune-up compliance report was received on January 31, 2014. Boiler #3 is subject to NSPS Dc, and the initial notification form was received on October 18, 2012.

The most recent burner inspections and tune-ups were conducted on four (4) boilers in October and November of 2022. EUBOILERN01 was conducted on October 19, 2022, EUBOILERN02 on October 26, 2022, EUBOILERN03 on November 9, 2022, and EUZSP-SPRAY-DRYER on October 7, 2022. AQD received notification of the inspections and tune-ups in the Annual MACT report. Per Mr. Kwiatkowski the reports are also being submitted to EPA's CEDRI.

Daily and monthly records are attached. The facility is maintaining daily emissions and fuel usage on a per day, per boiler basis as required. Combined boiler emissions are limited to 88.25tpy SO2 and 66.2tpy of NOx. Based on emission calculations for January 1,

2022, through April 30, 2023, the Highest rolling 12-month SO2 emissions was 0.06 tons (All Months) and 4.78 tons (July 2022) of NOx. There are other emission limits that apply only when firing fuel oil, however, the facility no longer uses fuel oil. Preventative maintenance is being conducted as required and all three boilers operate routinely for reliability purposes.

The boilers are also subject to the following emission limits. Based on the records provided for January 1, 2023, through April 30, 2023. Mead appears to be operating within these parameters.

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Recorded Amount
NOx	4.9 pph ²	Based on a daily average when firing natural gas	EUBOILERNO1, EUBOILERNO2 (Each individual boiler)	Boiler 1 = 0.673 Boiler 2 = 0.7
NO _x	4.39 pph ²		EUBOILERNO3	Boiler 3 = 1.448
NO _x	16.2 pph ²	Based on a daily average	FGBOILERS (All three boilers combined)	Combined = 1.466

FGZSP-BLEND-FILL

Two lines where dry powdered ingredients are mixed in blenders and one line where the product created is sifted and placed in hoppers that are used to fill containers. Each system is controlled by a separate fabric filter collector. The fabric filter collectors are installed and are being maintained to ensure compliance with the PM emission limit specified in SC 1.1 of 0.02 pounds per 1,000 pounds exhaust gas. The fabric filters are equipped with broken bag detectors to ensure proper control. If an alarm goes off indicating a potential leak, the entire process shuts down. The broken bag detector is calibrated annually. The last calibration was conducted on April 1, 2023.

FGZIPP-PMSOURCES

Dry ingredients are transferred, mixed, and placed into cans or other containers. Each system is controlled by one of three fabric filter collectors. PM emissions from EUCAN-FILL-LINE, EUN-BAG-LINE, and EUS-BAG-LINE are subject to 40 CFR Part 64 for CAM. The CAM requirements are found in FGCAMPM of the ROP which is discussed below.

The fabric filter collectors are installed and are being maintained to ensure compliance with the PM emission limit specified in SC 1.1 of 0.04 pounds per 1,000 pounds exhaust gas. The fabric filters are equipped with broken bag detectors to ensure proper control. If an alarm goes off indicating a potential leak, the entire process shuts down. The broken bag detectors are calibrated annually. The last calibrations were conducted on August 28, 2022.

FGNS-DRYERS

FGNS-DRYERS contains two emission units where liquid product is atomized into a hot air stream evaporating all moisture from which dried product is collected. Both stacks and broken bag detectors were observed, no problems were identified. Due to the large size of the units, there are two broken bag detectors on each emission unit. The most recent calibrations of the broken bag detectors were conducted on August 30, 2022.

FGDRY-POWDER

This Flexible Group consists of two dry powder blending processes and associated pneumatic powder transfer systems. Emissions from each dry blender (2) and each powder transfer system (2) are controlled by fabric filter collectors. The vacuum pumps have an in -line HEPA filter system. The pollution control system is installed and is being maintained to ensure compliance with the PM emission limit specified in SC 1.1 of 0.02 pounds per 1,000 pounds exhaust gas.

The fabric filters are equipped with broken bag detectors to ensure proper control. If an alarm goes off indicating a potential leak, the entire process shuts down. The broken bag detector is calibrated annually. The last calibration was conducted on December 14, 2022, which is attached.

FGCAMPM

The PM emissions from EUN-POWDER-BLEND, EUS-POWDER-BLEND, EUZSP-FILL-LINE, EUCAN-FILL-LINE, EUN-BAG-LINE, EUS-BAG-LINE, EUN-DRYER, EUS-DRYER, EUZSP-SPRAY-DRYER, EUDRY-POWDER1, EUDRY-POWDER2, EUBOWEN-DRYER, EUDIGEST-TANKS, EULIQUIFIER-TANK, EUZSP-LIQ-PROCESS are subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR Part 64. These emission units have control devices and potential pre-control emissions of PM greater than the major source threshold level. Emissions are control by either a fabric filter or a wet scrubber, see below.

Fabric filters: EUN-POWDER-BLEND, EUS-POWDER-BLEND, EUZSP-FILL-LINE, EUCAN-FILL-LINE, EUN-BAG-LINE, EUS-BAG-LINE, EUN-DRYER, EUS-DRYER, EUZSP-SPRAY-DRYER, EUDRY-POWDER1, EUDRY-POWDER2.

Wet Scrubbers: EUBOWEN-DRYER, EUDIGEST-TANKS, EULIQUIFIER-TANK, EUZSP-LIQ-PROCESS.

FGCAMPM requires Mead Johnson to install, maintain, and properly operate the respective fabric filter collector or wet scrubber and none of the emission units covered under this Flexible group shall be operated unless the filters are equipped with broken bag

detectors and the wet scrubbers are equipped with a water flow transmitter or pressure switch. Control devices are installed and have proper monitoring devices. Baghouse Differential Pressure (DP) and water flow are being monitored and maintenance is being conducted to ensure the control devices are operating properly. Mead is allowed to take daily non-certified visual opacity observations instead of monitoring flow and DP. Mead uses this as backup in case the broken bag detectors of flow monitoring devices malfunction. No malfunctions have occurred; therefore, Mead has not conducted any visual observations.

Based on discussions with Mr. Kwiatkowski and a records review, broken bag detectors are calibrated annually, and the flow/pressure switches are calibrated semi-annually. Monitoring data and maintenance records were readily available. DP and flow are monitored and recorded continuously. The water flow to the scrubber is required to be at a minimum 18gpm for EUBOWEN-DRYER and 1.5gpm for EUZSP-LIQ-PROCESS. At a minimum, the water pressure for EUDIGEST-TANKS and EULIQUIFIER-TANK needs to be maintained at 23 psi. Based on a review of this data, the facility is operating this equipment within specified operating parameters. The bag leak detectors alarm if the triboelectric signal is greater than 70% of the broken bag detector scale. There have been no recent alarms.

The facility appears to be conducting maintenance as needed to ensure proper operation and spare parts are kept onsite as required. The AQD is not requesting any changes to the current CAM Plan at this time.

Reports have been received on time and properly certified. No excursions, exceedances, or monitor downtimes were reported. However, the recent (3/16/2023) annual ROP Certification noted that three (3) deviations occurred during 2022. One was for failure to record the water pressure for EULIQUIFIER-TANK during the months of March, May, and June and the second during the months of September - December. The process is interlocked in such a way that it automatically shuts down if no or low water flow is detected which did not occur, so no exceedances are expected. As part of their recent ROP renewal (issued 9/20/22), the facility committed to recording pressures continuously, which is now required by Special Condition VI.4 of FGCAMPM. The facility had 90 days from the ROP issuance (December 19, 2022) to prepare and start recording continuously. Although work was completed within the specified deadline the facility discovered in January 2023, while collecting data, that the engineering company that completed the work misunderstood what was being asked and installed the wrong equipment. Upon discovery, work was initiated, and the necessary pressure monitors were installed on March 15, 2023. This is reflected in the records for EULIQUIFIER-TANK since they begin on March 16, 2023.

Since the wrong equipment was installed, the facility considered this a deviation of Special Condition VI.4 for not recording continuously within 90 days of ROP issuance, which is appropriate. This is the third deviation noted on the Annual ROP Certification.

FGGASHEATMACTSMALL (< 10 MMBTU/hr.) and FGGAS1HEATMACTLARGE (>=10 MMBTU/hr.)

These flexible groups contain the conditions for six (6) boilers/process heaters that are subject to 40 CFR Part 63, Subpart DDDDD (Boiler MACT).

EUZSP-SPRAY-DRYER is a natural gas fired process heater that has a max heat rating of 9.5 MMBTU/hour. This includes the process heater, a spray drying operation, and spray dryer cleaning operations.

EUBOILERNO1 and EUBOILERNO2 are Erie City Company boilers that primarily combust natural gas but are capable of combusting No. 2 fuel oil. Both have a maximum heat input capacity of 35 MMBTU/hr. when firing natural gas and 42 MMBTU/hr. when firing fuel oil. EUBOILERNO3 is Cleaver Brooks natural gas fired boiler equipped with an Oxygen trim system and a maximum heat input capacity of 97 MMBTU/hour.

EUS-DRYER-HEATER South spray dryer. Liquid product is atomized into a hot air stream evaporating all moisture. Dried mixture is recovered by cyclone separators. PM is controlled by two parallel fabric filter collectors.

EUN-DRYER-HEATER (North spray dryer) is used to atomized liquid product into a hot air stream evaporating all moisture. Dried mixture is recovered by cyclone separators. PM is controlled by two parallel fabric filter collectors.

Fuel usage is being tracked for all boilers/process heaters. EUBOILERNO1, EUBOILERNO2, and EUBOILER03 are required to be inspected and tuned-up annually since the max heat ratings are greater than 10 MMBTU/hour. Tune-up and inspections for EUZSP-SPRAY-DRYER are required to be conducted biennially since it has a heat rating of greater than 5 MMBTU/hr. but less than 10 MMBTU/hour. Tune-ups and inspections for EUN-DRYER-HEATER and EUS-DRYER-HEATER are required every five (5) years since they are equipped with continuous oxygen trim systems. The previous inspection and tune-ups for EUBOILERN01 were last conducted on 10/13/2021 and 10/19/2022, EUBOILERN02 on 10/20/2021 and 10/26/2022, EUBOILERN03 on 11/3/2021 and 11/9/2022, EUB-DRYER-HEATER on 9/16/2021, and EUZSP-SPRAY-DRYER on 11/28/2021 and 10/7/2022. Reports are being submitted to the AQD and per Mr. Kwiatkowski they are also being submitted to the EPA through the CEDRI reporting system.

FGCI-RICEMACT, FGSI-RICEMACTEXISTING, and FGSI-RICEMACTNEW

These flexible groups contain the conditions for one diesel fueled fire pump engine (EUFIRE-PUMP), two "Existing" emergency generator engines (EUNG-GENERATOR, EUPROP-GENERATOR) and one (1) new emergency generator engine (EUNG2-GENERATOR). All are equipped with non-resettable hour meters. The facility maintains compliance through required annual oil and filter changes. Maintenance logs are being maintained.

Rule 201 Permitting Exemptions (FGRULE290 & FGCOLDCLEANERS)

Meade operates several emission units under Rule 201 permitting exemptions Rule 285 and Rule 290. Rule 290 exempt emission units are covered under Flexible Group FGRULE290 of the ROP and include EUEZ1-PACKAGING, EUZSP-BULK-BAG, EUDRY-SOLIDS-LIQ, EUWWTU-FOGGER, EUZIPP-VACRECEIVER, EUZIPPEMPTYCANCLEANER, EUZIPPFULLCANCLEANER, and EUZSPCANCLEANER. Rule 290 records are maintained under a one-time demonstration. Each Rule 290 emission unit that emits particulate matter is equipped with broken bag detector installed for particulate matter monitoring.

Rule 285 exempt emission units are covered under Flexible Group FGCOLDCLEANERS (285(2)(r)(iv)) which includes three cold cleaners (EUZSP-COLDCLEANER, EUZIPP-COLDCLEANER, and EUWWTP-COLDCLEANER). Cold cleaners are closed when not being used.

2) MAERS

Report submittal certification form was received on time with proper certification on 3/15/23. AQD staff CR reviewed the submittal on April 17, 2023. No changes were made to the database as submitted. Source-wide emissions as reported are listed below.

Pollutant	Amount (Tons)
Ammonia	0.33
СО	17.66
Lead	0.0001
NOx	20.29
PM10	15.75
PM2.5	3.61
SO2	0.13
TOC	0.02
VOC	16.35

E) Conclusion

Based on observations, discussions and review of records Mead Johnson & Company LLC appears to be operating in compliance with applicable air quality rules and regulations.

NAME

DATE 7/7/2023

SUPERVISOR