

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

B361058531

FACILITY: Pharmacia & Upjohn Co LLC, a subsidiary of Pfizer	SRN / ID: B3610
LOCATION: 7000 Portage Road, KALAMAZOO	DISTRICT: Kalamazoo
CITY: KALAMAZOO	COUNTY: KALAMAZOO
CONTACT: Jeff Robey, Senior Specialist EH & S	ACTIVITY DATE: 05/27/2021
STAFF: Monica Brothers	COMPLIANCE STATUS: Compliance
SUBJECT: Scheduled Inspection: ROP Section 1	SOURCE CLASS: MEGASITE
RESOLVED COMPLAINTS:	

This was an announced scheduled inspection. This inspection was the first year's inspection of the three-year inspection cycle, and Section 1 of Pfizer's ROP and PTI #57-15, 99-18, and 49-20 were covered. I arrived at the facility at 9:00am and met with Jeff Robey, Manager EHS. We first did the walk-through portion of the inspection and looked at the equipment associated with Section 1 of the ROP. Then we reviewed records.

EUE43-ASH-S1:

All of the coal boilers at the facility have been dismantled, and therefore the ash handling system is no longer in use. However, they are still keeping records on file for the ash handling system.

EUEBLR 43-7-S1:

This is a 120,000 lbs steam/hr natural gas boiler with No. 2 fuel oil as backup. They have not run fuel oil in over twenty years and do not have any oil storage tanks on-site for use by Boiler7. This unit was running at 56,886 lbs steam/hr at the time of inspection.

EUEBLR43-8-S1:

This is a 120,000 lbs steam/hr natural gas boiler with No. 5 fuel oil as backup. They have not run fuel oil in over twenty years and do not have any oil storage tanks on-site. This unit was not running at the time of inspection because it was shut down for annual preventative maintenance.

PTI #57-15: EUEBLR43-9-S1:

This is a 120,000 lbs steam/hr natural gas boiler with maximum heat input capacity of 144.7 MMBTU/hr. It has low NOx burners and flue gas recirculation as its pollution control equipment, and only natural gas may be burned in this unit. It has a continuously operating oxygen trim system and a CEMS that continuously records NOx emissions. At the time of inspection, the NOx CEMS read 21.473 ppm at 3.383% O₂. The unit was operating at 62,153 lbs steam/hr during the inspection. PTI #57-15 limits the unit to 0.20 lb/MMBTU on a thirty-day average. The facility is keeping these records, and the highest value I observed was 0.045 lb/MMBTU in February 2019. This PTI also limits the unit to 32.0 TPY on a 12-month rolling timescale. They are keeping these records. The highest number I saw was during June 2018, and it was 11.4 TPY. They are limited to using no more than 1,261,860 gallons of #2 fuel oil per year before July 1, 2021 and 1,614,170 gallons per year after June 30, 2021, based on a 12-month rolling timescale. Jeff showed me these records and they are under these limits. They are also keeping track of how much natural gas and #2 fuel oil they are using and when. They are also keeping track of the number of hours they use

fuel oil and the capacity factors for natural gas and fuel oil. They also have records to show that the fuel oil contains less than 0.0015 weight percent sulfur.

PTI #99-18 and PTI #49-20: FGBLR43-10&11-S1

This flexible group is for two new 120,000 lb steam/hr boilers with 143.2 MMBTU/hr heat input capacity for natural gas and 138.5 MMBTU/hr for #2 fuel oil. Natural gas is used as the primary fuel, with #2 fuel oil being used as backup. These boilers have low NO_x burners and flue gas recirculation for NO_x control and have a CEMS to monitor NO_x emissions. At the time of inspection, Boiler 11 was operating at 48,202 lbs steam/hr, and the NO_x CEMS read 24.7 ppm at 3.32% O₂. The PTIs limit the units to 0.20 lb/MMBTU on a thirty-day average. The facility is keeping these records, and the highest value I observed for Boiler 10 was 0.042 lb/MMBTU in February 2021. The highest value I observed for Boiler 11 was 0.028 in April 2021. The PTIs also limit the unit to 33.6 TPY on a 12-month rolling timescale. They are keeping these records. The highest number I saw for Boiler 10 was 0.5 TPY, during April 2021, and the highest number I saw for Boiler 11 was 1.9 TPY during April 2021. They are limited to using no more than 2,527,380 gallons (combined) of #2 fuel oil per year before July 1, 2021 and 3,839,580 gallons per year after June 30, 2021, based on a 12-month rolling timescale. Jeff showed me these records and they are under these limits. They are also keeping track of how much natural gas and #2 fuel oil they are using and when. They are also keeping track of the number of hours they use fuel oil and the capacity factors for natural gas and fuel oil. They also have records to show that the fuel oil contains less than 0.0015 weight percent sulfur. There are three new 20,000-gallon #2 fuel oil tanks that have been constructed, which supply #2 fuel oil to Boilers 9, 10 and 11. I observed these new tanks during the inspection.

FGBLR43-1-6-S1:

All coal boilers at the facility have been dismantled, but Pfizer is still keeping the required records on file at the facility. The fabric filters have bag leak detection alarms, and they must not sound more than 5% of operating time in a 6-month period. Jeff showed me the alarm records, which showed that they are in compliance with these requirements. In each alarm case, the MAP was followed, and corrective actions were taken. Jeff also showed me records of the coal sulfur content analysis. They are required to keep records of an annual composite coal sample analysis, as well as a % sulfur content analysis for each delivery. The limit is 1.5% sulfur by weight, and their records showed that they were under this limit.

EUB51GENERATOR-S1:

This is a diesel-fired reciprocating engine with a max capacity of 1.25MW. It is used only as an emergency generator, and it is not subject to MACT or NSPS. Only During the tour, the non-resettable hour meter read 356.1 hours. The unit uses only ultra-low (15ppm) sulfur diesel. The permit requires that they keep track of the date, duration, and description of malfunctions and corrective maintenance, and Jeff showed me that they are keeping these records. This unit also has a NO_x emissions limit of 12.9 TPY on a 12-month rolling timescale. Records showed that they are under this limit, with the maximum being 2.17 TPY in May 2021. They are also under their operating hours limit of 500 hours per 12-month rolling, with 83.7 hours being the highest I observed on 5/20/2021.

FGCOLDCLEANER-S1:

There are 13 cold cleaners associated with Section 1 of the ROP. Jeff showed me a list of them that showed the specifications for each unit. Each unit has an identifier, date of installation, air/vapor interface area, Reid vapor pressure, and solvent type. The units use either Safety-Kleen Premium Gold or Isopar-L. None of the units are agitated or heated. During the facility tour, I observed six of these cold cleaners, and each had rules posted and the lid closed.

FGRULE290-S1:

This flexible group is for EUELECTROPOLISH-S1 and EUEB43COALUNLOADING-S1. Jeff showed me the Rule 290 records for each of these emission units, which specified each contaminant emitted, whether it was controlled or uncontrolled, the ITSL/IRSL, and the calculated actual emissions. The records showed that they were under the required limits. The coal unloading process is no longer occurring because all of the coal boilers have been dismantled.

FG-RICEMACT:

These emergency generators are subject to Subpart ZZZZ. Jeff is keeping track of the hours of operation, the purpose of operation, the occurrences of any malfunctions and corrective actions taken, and maintenance records for each unit. These records show that they are under the hours-limits and are doing appropriate maintenance. During the facility tour, I observed the emergency generator for the fire station (Building 186), which had a non-resettable hour meter that read 426.1 hours. This unit runs on diesel fuel. There is also a new Cummins Generator that was installed a couple of years ago that is for Building 480. The non-resettable hour meter read 34.6 hours at the time of inspection.


FG-RICE-CI-NSPS:

This flexible group consists of four fire pumps that are subject to Subpart IIII. Jeff has records of the hours of operation for each unit, and they are under the hours-limits set forth in this subpart. Jeff also showed me that the units use only ultra-low sulfur diesel (15ppm). During the inspection we had some trouble getting the pumps to show the hours on the screens, but Jeff showed me where they log the hours each month, and they are keeping these records appropriately. On March 22, 2021, Pump 1 showed 253.8 hours, Pump 2 showed 439.4 hours, and Pump 3 showed 404.0 hours, On April 6, 2021, Pump 4 showed 383.5 hours.

FG-RICE-SI-NSPS:

This flexible group consists of one propane-fired emergency generator that is subject to Subpart JJJJ. Jeff is keeping track of the hours of operation, the purpose of operation, the occurrences of any malfunctions and corrective actions taken, and maintenance records for the unit. These records show that they are under the hours-limits and are doing appropriate maintenance. During the facility tour, I observed this 14kW emergency generator, which is for Building 76. The non-resettable hour meter read 306.2 hours during the inspection.

The facility seemed to be in compliance at the time of inspection.

NAME 

DATE 8/24/21

SUPERVISOR R.L. 8/30/21