



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
KALAMAZOO DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

June 15, 2021

Mr. David Breen
Pharmacia and Upjohn LLC, a subsidiary of Pfizer Inc.
7000 Portage Road
Kalamazoo, Michigan 49001-0199
SRN: B3610, Kalamazoo County

Dear Mr. Breen:

VIOLATION NOTICE

On May 27, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), met with Pharmacia and Upjohn LLC, a subsidiary of Pfizer Inc. (Facility) to discuss a permitting issue. The facility discovered that they had accidentally installed two acetone process tanks without a Permit to Install. These tanks are part of a larger project, which was permitted under PTI # 16-19A, but were not included in the PTI application and were, therefore, not reviewed during the permitting process.

During the meeting, staff was informed of the following violations:

Process Description	Rule/Permit Condition Violated	Comments
Two acetone process tanks	R 336.1201 (Rule 201)	Two acetone tanks were installed without a PTI.

During this meeting, it was noted that the facility had installed unpermitted equipment at this facility. The AQD staff advised the facility on May 27, 2021, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the two acetone process tanks. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 6, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are

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proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Pharmacia and Upjohn LLC., a subsidiary of Pfizer Inc. believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of the facility. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Monica Brothers

Monica Brothers
Senior Environmental Quality Analyst
Air Quality Division
269-312-2535

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE
Mr. Tim Swainston, Pfizer