



GRETCHEN WHITMER
GOVERNOR

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



AARON B. KEATLEY
ACTING DIRECTOR

June 15, 2023

Jill June

Pharmacia and Upjohn LLC, a subsidiary of Pfizer Inc.

7000 Portage Road

Kalamazoo, Michigan 49001-0199

SRN: B3610, Kalamazoo County

Dear Jill June:

VIOLATION NOTICE

On June 14, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), spoke with Pharmacia and Upjohn LLC, a subsidiary of Pfizer Inc. (Facility) via telephone to discuss a permitting issue. The facility recently discovered that they had accidentally been operating two unpermitted processes with unpermitted stacks within Building 91. These processes were previously believed to be exhausted by stacks already contained within their permit, but it was recently determined that these processes had separate stacks/exhausts which were not included in the permitting process.

During the telephone conversation, staff was informed of the following:

Process Description	Rule/Permit Condition Violated	Comments
Commercial Product Laboratory (CPL) in Lab 294 and East Packout Room, both in Building 91.	R 336.1201 (Rule 201)	Two processes and associated stacks were installed and operated without a Permit to Install.

During this telephone conversation, it was noted that the facility had installed and operated unpermitted equipment at this facility. The AQD staff advised the facility on June 15, 2023 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 CPL and East Packout Room process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

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 violations and submit a written response to this Violation Notice by July 6, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

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violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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 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 violations cited above. If you have any questions regarding the violations 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: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Rex Lane, EGLE
Mr. Tim Swainston, Pfizer