

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

A585826811

FACILITY: Mead Johnson & Company, LLC		SRN / ID: A5858
LOCATION: 725 E. Main Street, ZEELAND		DISTRICT: Grand Rapids
CITY: ZEELAND		COUNTY: OTTAWA
CONTACT: Thomas A. Joelson, Senior EH&S Facilitator		ACTIVITY DATE: 09/04/2014
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff arrived on site at 9:30 AM and met with Tom Joelson, Sean Miller and Mike Monaghan. Staff informed them of the scope of the inspection and presented each with a copy of the DEQ Environmental Inspections: Rights and Responsibilities brochure and discussed its contents. The scope of the inspection was outlined to include meeting the Compliance Monitoring Strategy requirement as a Full Compliance Evaluation. The inspection will include the components of the Renewable Operating Permit (ROP) MI-ROP-A5858-2012.

FACILITY DESCRIPTION

Mead Johnson & Company manufactures powdered milk products for infants, and makes products for people with special medical needs. The facility has many sources of particulate controlled by either baghouses, rotoclones or wet scrubbers. There are two boilers installed in 1960 which were upgraded in 1994 to utilize low NOx burners. This change is not considered a modification pursuant to NSPS. A third boiler was installed in 2012 and is natural gas fired. The stationary source is subject to the Maximum Achievable Control Technology Standards as applicable, Subpart ZZZZ for Reciprocating Internal Combustion Engine with compliance deadlines of 2012 and more recently Subpart DDDDD for Industrial Commercial and Institutional Boilers and Process Heaters with a compliance date of 2016. At this time, the AQD will not re-open the ROP to incorporate specific requirements. The digesters and two large ZIPP baghouses are also subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM). The CAM requirements have been incorporated into the ROP.

Due to the large nature of the facility, staff and Mr. Joelson, used the ROP and the Malfunction Abatement Plan (MAP) as an inspection tool and visited the permitted and exempt emission units. The entire ZSP plant was down for maintenance at the time of the inspection. Staff requested print outs of readings of equipment for July 2014 and the last scheduled maintenance report. (see attached and below for details) The roof was not accessed due to weather. It did not appear as though any stack changes had taken place. No physical measurements were taken. Staff also observed the waste gas flare. This is located at the facility waste water treatment site. Staff also observed the RICE MACT subject emergency generators. Based on discussion with Mr. Joelson, they meet the operational requirements of "emergency" as defined.

Mr. Joelson confirmed the presence of the required labeling to EUDIGEST-TANKS room vent stacks.

The inspection continued into the ZIPP plant. The large baghouses/dryers broken bag detectors for the ZIPP plant were accessed at the time of the inspection and appeared compliant.

Staff did not observe the stacks on the ZIPP building due to weather.

EUBOWEN-DRYER

Emission limit to be verified by testing and maintenance. Minimum water flow of 18 gpm on the wet scrubber. July 2014 reading was 23.4 gpm. Last semi-annual PM as required by MAP was conducted on 05/21/2014. No stack changes discussed.

EUDIGEST-TANKS

Following the emission unit inspection, staff requested the digest emissions records, which were provided via e-mail timely. This EU was not in operation at the time of the inspection. No issues were identified at EUDIGEST-TANKS. Condenser and associated equipment PM was last conducted on 09/03/2014. Rotoclone equipment PM was last conducted on 04/06/2014.

Emission limit of VOC from vents V1 through V5 is 181.7 pounds per 24-hour period and 33.2 tons per 12-month rolling time period. Current reported emissions calculated through July 2014 were a maximum of 91 pounds per 24 hour period and 1.41 tons. (see attached records) Emission limit of VOC from the steam ejector vent SVO11 is 96.4 pounds per 24 hour period and 8.8 tons per 12-month rolling time period. Current reported emissions through July 2014 were 31.5 pounds per 24-hour period and 1.38 tons. (see attached records)

EUZSP-VIT-WEIGH

Emission limit to be verified by testing and maintenance. Was not in operation at the time of the inspection. Last PM as required by MAP was conducted on 04/12/2014. No observed stack changes.

EULIQUIFIER-TANK

This process consists of mixing tanks with associated rotoclone control equipment. Last PM as required by MAP was conducted on 08/20/2014. The water pressure reading at the time of the inspection was 70 psi.

EUWW-TREATMENT-NDIGESTER

The unit was observed. It utilizes a natural gas feed for the pilot and continuous flame. When enough waste gas is generated it is routed to the flare and burned. No observed stack changes.

EUZSP-LIQ-PROCESS

The unit was not in operation. Last PM as required by MAP was conducted on 05/02/2014. July 2014 reading was 3.44 gpm

EUZSP-SPRAY-DRYER

The unit was not in operation. VOC limited to 1.8 tpy per 12-month rolling time period, and 167 lbs of sodium hydroxide per wash cleaning cycle. Reported emissions through June 2014 are 429 pounds (0.02 tons) and the highest sodium hydroxide per wash use was 98 lbs.

FGNS-DRYER-HTRS

Only natural gas is burned in the heaters, no opacity was observed. There have been no stack changes. These units are subject to 40 CFR 63 Subpart DDDDD as process heaters. An initial notification report was received on May 28, 2013.

FGBOILERS

The flexible group consists of three boilers. Two Erie Co. boilers can burn either natural gas or fuel oil. 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. A discussion as to whether or not the fuel oil requirements and limits could be removed through the

ROP process took place. It has been determined that this change would need to take place through permit review, to modify the emission limits accordingly. The third boiler, Cleaver Brooks, 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. The company is aware of the energy efficiency report that will be due. Boiler #3 is also subject to NSPS Dc, and the initial notification form was received on October 18, 2012.

SO2 12-month rolling emissions are limited to 88 tpy. Current emissions through June 2014 were 0.05 tons. NOx 12-month rolling emissions are limited to 66.2 tpy. Current emissions through June 2014 are 3.97 tons. The facility no longer burns fuel oil. All three boilers PM as required by MAP was conducted on 04/17/2014.

FGZSP-BLEND-FILL

This flex group contains three emission units, none of which were in operation. There have been no stack changes. Last PM as required by MAP was conducted on each of the three units on 04/28/2014.

FGZIPP-PMSOURCES

This flex group contains four emission units. All stacks and broken bag detectors were observed, no problems were identified. Last PM as required by MAP was conducted on 03/11/2014 and 03/12/2014. No observed stack changes.

FGNS-DRYERS

This flex group contains two emission units. Both stacks and broken bag detectors were observed, no problems were identified. Last PM's as required by MAP were conducted on 05/09/2014. No observed stack changes. CAM monitoring did not indicate any excursions or exceedances for the units during the last reporting period.

FGCI-RICEMACT

This flex group contains conditions that apply to a diesel fired fire pump. Staff observed the non-resettable hour meter and recorded the value 937.9 hours. The facility maintains compliance thorough required oil and filter changes annually.

FGSI-RICEMACT

This flex group contains conditions that apply to one natural gas fired emergency generator and one propane fired emergency generator. Staff observed the non-resettable hour meter on each. The NG unit read 168 hours and the PROP unit read 168 hours. The facility maintains compliance through required oil and filter changes annually.

FGRULE 290

This flex group contains several emission units. Records are overall maintained under the one time demonstration for the exemption. On Rule 290 emission units emitting particulate matter, all units utilize broken bag detectors for PM monitoring.

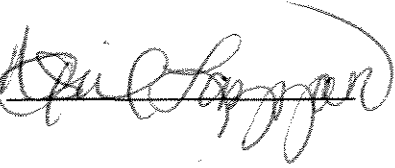
FGCOLDCLEANERS

There are two existing cold cleaners. The facility maintains the AQD required postings.

EVALUATION SUMMARY

Staff indicated to Mr. Joelson, Mr. Miller and Mr. Monaghan that no compliance issues were identified during the physical on-site compliance inspection. Following records review and the completion of the FCE, the facility is considered in compliance at this time.

NAME



DATE

9-11-14

SUPERVISOR

PAB