

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

B428858537

FACILITY: Zoetis LLC		SRN / ID: B4288
LOCATION: 333 Portage Street, KALAMAZOO		DISTRICT: Kalamazoo
CITY: KALAMAZOO		COUNTY: KALAMAZOO
CONTACT: Becky Gross , Environment, Health, and Safety Manager		ACTIVITY DATE: 06/03/2021
STAFF: Monica Brothers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Announced, Scheduled, On-site Inspection		
RESOLVED COMPLAINTS:		

Staff, Monica Brothers, arrived on-site at 1:00 pm and met with Becky Gross, the Environment, Health and Safety Manager. Upon arrival, no visible emissions were seen coming from any stacks on the building. We first went to a conference room to go over some of the recordkeeping that Becky had previously sent me before the onsite inspection. We also discussed some preliminary questions I had about the facility, before doing the walk-through inspection. Becky said that Zoetis is a research and development facility for veterinary medicines. They commenced operations at that location in the early 1990s, when it was still owned by Pfizer, and then it became Zoetis around 2014. They have about 850 employees who work two shifts per day, Monday through Friday. Zoetis is considered an Opt-Out facility for NOx and are currently operating under PTI #4-13B. They have three boilers, nine emergency generators, one fire pump, and two cold cleaners. After our opening conference, we took a walk-through of the facility.

**EUB214BOILER4:**

This is a 93.2 MMBTU/hr natural gas only boiler. It is subject to 40 CFR Part 60, Subparts A and Dc. They have a volumetric flow meter to measure the fuel flow rate. They are keeping records of monthly natural gas usage, along with hourly fuel flow rate and NOx emissions. They are limited to 0.095 MMscf/hr hourly fuel flow rate, and records show that they are consistently under this limit, with 0.053 MMscf/hr in February 2019 being the highest value in the last three years. They are also limited to 6.5 pph NOx and records show that they are under this limit.

**EUB214BOILER5:**

This is a 95.5 MMBTU/hr natural gas and fuel oil boiler. It is subject to 40 CFR Part 60, Subparts A and Dc. It has low NOx burners to control NOx, and they are required to do annual visible emissions testing while running on fuel oil. They have been conducting these visible emissions tests and have not seen any visible emissions. They are keeping records of their natural gas and fuel oil usage each month, along with how many hours are spent burning fuel oil. They have a NOx emissions limit of 12.1 tpy (12-month rolling), and their records show that they are consistently under this limit, with 3.46 tpy in January 2020 being the highest value in the last three years. They also keep records of their fuel oil sulfur content which indicate that it is ultra-low sulfur diesel and under the permitted limit of 0.5% sulfur by weight. Boiler 5 was running at 12,000 lbs steam/hr at the time of the inspection.

**FG214BOILERS:**

This flexible group contains EUB214BOILER4, EUB214BOILER5, and EUB214BOILER1. EUB214BOILER1 is a 72.4 MMBTU/hr natural gas only boiler capable of producing 70,000 lbs

steam per hour. They are required to keep records of monthly natural gas usage and are limited to 500 MMscf/year (12-month rolling). Records show that they are consistently under this limit, with 218.31 MMscf/year in November 2018 being the highest value in the past three years.

#### FGGENBLDGENGINES:

This flexible group is for seven Cummins diesel fuel-fired RICE generators used for emergency power in Building 292. They are subject to 40 CFR Part 63, Subpart A and ZZZZ. There are six 2,922 bhp engines and one 470 bhp engine. They are keeping records of hours of operation for each emergency engine and are consistently under their permitted limit of 2026 hours per year (12-month rolling). They are also keeping records of maintenance, malfunctions, and corrective actions. During the inspection, EUENGINEGEN1 read 271.2 hours, EUENGINEGEN2 read 268.8 hours, EUENGINEGEN3 read 258.9 hours, EUENGINEGEN4 read 252.3, EUENGINEGEN5 read 248 hours, EUENGINEGEN6 read 242.6 hour, and EUENGINEGENAUX read 205.5 hours. The emergency engines are run once a month for readiness testing.

#### FGB300ENGINES:

This flexible group is for two 1850 bhp diesel fuel-fired RICE used for emergency power in Building 300 and one fire pump. They are subject to 40 CFR Part 63, Subpart A and ZZZZ. They are keeping records of hours of operation for each emergency engine and are consistently under their permitted limit of 1000 hours per year (12-month rolling). They are also keeping records of maintenance, malfunctions, and corrective actions. During the inspection, EUB300ENGINEGEN1 read 270.9 hours, EUB300ENGINEGEN2 read 269.2 hours, and the fire pump read 824.5 hours. The emergency engines and fire pump are run once a month for readiness testing.


#### FGFACILITY:

They are required to keep records of natural gas usage, fuel oil usage, operating hours, and NOx emission rates. They are limited to 90 tpy of NOx (12-month rolling). They are keeping these records and are consistently under this limit, with 11.48 tpy in November 2018 being the highest value within the last three years.

#### Parts Washers:

There are two parts washers at the facility. One is in the boiler house and the other is in the office maintenance area. During the inspection, the lids were closed, and the rules were posted. Neither of these units are heated or agitated. The units use Safety-Kleen Premium Solvent and are maintained by Safety-Kleen.

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

NAME 

DATE 8/24/21 SUPERVISOR RIL 8/30/21