

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

N351933863

FACILITY: Zoetis LLC		SRN / ID: N3519
LOCATION: 5300 N. 28TH STREET, RICHLAND		DISTRICT: Kalamazoo
CITY: RICHLAND		COUNTY: KALAMAZOO
CONTACT: Mark Lemons,		ACTIVITY DATE: 03/23/2016
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

This was not an announced inspection. Mark Lemons is the contact person. AQD staff included Amanda Chapel, Monica Brothers, and Dennis Dunlap. The inspection brochure was handed out. The facility does animal research as well as produces coral snake anti-venom and ATGAM.

This facility is classified as synthetic minor for NOx. Permit 139-05B covers 8 emergency generators with a 15.5 ton NOx limit per 12-month rolling time period. There are currently two other emergency generators (Bldg. 653 and Bldg. 83) and Building 651 Diesel Pump Engine (160 hp) that are not covered under 139-05B. Two 16.7 MMBtu/hr Johnston Boilers in Building 651 are not covered as well as other boilers and heaters and the incinerator. In 2007 an opt-out application was submitted but withdrawn. This application enumerates most of the boilers and heaters. Based on that application and Permit 139-05B, the potential-to-emit for NOx for the facility is approx. 58 tons per year. There may be some changes to the generators in the future (one may be added and some moved). It is recommended that generators not covered under 139-05B as well as the Building 651 Pump Engine be covered under a permit (if applied for). The irrigation pump is now electric- powered (formerly diesel-powered). The Building 653 and 83 generators are 2.6 MMBtu/hr units and are exempt from permit requirements by Rule 285(g). The generators are generally started up on Fridays. Hours of operation and other information is reported monthly.

All ten emergency generators were seen as well as the Building 651 Pump Engine. The former include Bldg. 190, 304, 341, 353, 651, 609, 608, 612, 653, 83 generators. The ten emergency generators are grouped in the recordkeeping and includes hours of operation, monthly NOx emissions, and 12-month rolling time period NOx emissions. They are in compliance with the 15.5 ton limit.

It appears that the following emergency generators are subject to 40 CFR Part 63 Subpart ZZZZ: 190, 304, 341, 353, 651, 609, 608, and 612. The requirement may be to change oil and oil filter annually, and inspect annually and replace if necessary air cleaners, hoses, and belts (there is also an hours of operation condition). AQD is not delegated for this MACT standard so the inspection did not include compliance with ZZZZ.

Emergency engines 653 and 83 are natural gas-fired and installed in 2012. They may be subject to 40 CFR Part 60 Subpart JJJJ. These engines should have been certified by the manufacturer to be in compliance with JJJJ.

For the incinerator records are kept for each use and the date, type of waste, weight of waste, and secondary chamber temperature are recorded. Specific records were seen for Sept., Oct., and Nov. of 2015. There is also an electronic database showing a graph of the secondary chamber temperature. It appears that the secondary temperature was at 1800 degrees F or higher when in use. The incinerator was not operating during the inspection and may not have operated in the last two months. An alarm occurs during operation if the secondary chamber drops below 1800 degrees F, if it goes above 2000 degrees F, or if the hourly average drops below 1800 degrees F. The incinerator is covered by permit 229-92. Based on past information, the incinerator is classified as a pathological incinerator. It is exempt from 40 CFR Part 60 Subparts Ce and DDDD.

In Building 289 there is a Cleaver Brooks 17.5 MMBtu/hr natural gas-fired boiler installed in 1985. This is not subject to 40 CFR Part 60 Subpart Dc. It is exempt by Rule 282(b)(l).

There is a shop building. There was a cold cleaner. The lid was closed and rules were posted. There

are also saws, grinders, drills, a lathe, a sandblaster with internal dust collection. This equipment appears to be exempt by Rule 285(vi). There is also welding equipment here. This is exempt by Rule 285(l). In an adjacent building Mr. Lemons said that there was a spray booth for paint that had not been used for about three years. This is exempt by Rule 287(c).

Near the incinerator inside the building there is an autoclave used to sterilize animal bedding for disposal. This is exempt by Rule 281(l).

In Building 651 there are two natural gas-fired 16.7 MMBtu/hr Johnston boilers installed in 2004. It appear that they are subject to 40 CFR Part 60 Subpart Dc. They are exempt by Rule 282(b)(l).

In building 353 there are two hot water boilers (5 MMBtu/hr) and two steam boilers (0.9 and 1.5 MMBtu/hr). These are exempt by Rule 282(b)(l).

In Building 651 there is an animal digester. We were not able to enter this building. It appears that this would be exempt by Rule 285(n). In the swine area there is a slurry tank. Waste is sent to the sanitary sewer. It appears that this would also be exempt by Rule 285(n).

The facility appears to be in compliance.

NAME Dennis Dunlap

DATE 3/25/16

SUPERVISOR MD 3/25/2016