

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

N568824956

FACILITY: Perrigo Holland, Inc.		SRN / ID: N5688
LOCATION: 13295 REFLECTIONS DR, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: Cris Hillman , Environmental Coordinator		ACTIVITY DATE: 04/15/2014
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Cris Hillman, Environmental Coordinator. Staff presented the DEQ Environmental Inspections: Rights and Responsibilities Brochure and its contents were discussed.

This facility operates under Permit to Install (PTI) No. 124-11C, which covers various pharmaceutical and nutritional materials manufacturing equipment at the facility. It is subject to the Chemical Manufacturing Area Sources (CMAS) 40 CFR 63 Subpart VVVV. Michigan does not have delegation for this regulation and therefore, compliance was not evaluated. Staff did provide the facility with the Q & A document from the 2013 amendments for their review. Three boilers are present at the facility subject to New Source Performance Standard Subpart Dc. Fuel flow meters have been (or will be) installed on each.

Staff evaluated the most recent boiler installation with regard to Rule 201. The newest boiler is a natural gas fired Cleaver Brooks unit at 10,043,700 Btu/hr design heat input capacity. It appears as though Perrigo should have included it in PTI application, based on the Permit to Install: Determining Applicability guidebook and Rule 278 guidance for defining a "Project". Because the third boiler has been specifically installed in order to provide steam to new chemical manufacturing equipment, it is considered part of that project. Staff has provided Perrigo with the opportunity to evaluate this with their consultant Rachel Proctor of TRC consulting. During a post-inspection conference call with Mr. Hillman and Ms. Proctor, the term project and Rule 278 were discussed.

The facility submitted a detailed Technical Memorandum received on May 1, 2014 that demonstrates that the facility does not need a PTI for the boiler.

Mr. Hillman showed staff how he conducts his recordkeeping each month. The records observed were current and available for review. The system in place appears acceptable to demonstrate compliance. An example of the records is attached. The recordkeeping review included a determination that the permit limits have been input to the facility recordkeeping format. It appears correct. If the permit is modified in the future, staff will suggest that the table in the permit, utilize CAS #'s to properly identify a chemical. There are various ingredients that have more than one screening level and more than one name. (ex. aspirin)

Staff was accompanied by Mr. Hillman and Barry Cook, HVAC specialist to observe the pollution control equipment, and evaluate how it aligns with the facility operation and maintenance (O & M) plan, which the facility list submitted on March 20, 2014 was used as a guide. (attached) The units in operation at the time of the inspection were found acceptable. However, the unit labeled as DC-12 did not have the pressure drop hoses connected from the read out to the baghouse. This was because the hoses were not long enough. According to Mr. Hillman the hoses were fixed that day, and the pressure drop reading was 0.2" W.C. which is below the reading allowed in the O & M plan. Per this report a follow up e-mail is requested on this reading.

An external walk around as well as a roof stack observation was conducted, with no obvious particulate emission issues. This is easily identified at this site as most of the products manufactured are colored.

A review of the control device weekly PM sheets were requested and received for the week of 4/10-4/17/14. On the DC-10 unit, the pressure drop was below the lower level of acceptance. However, it is unclear based on the format of the form itself if action was taken as a result. This would correspond with O & M plan line item #6. Per this report, the AQD requests that the company modify this form to allow for a check box to verify that action is taken at the time the information is recorded.

The facility was in compliance at the time of the inspection.

NAME *Paul Langgan*

DATE 5-5-14

SUPERVISOR *PAB*