

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Pharmacia & Upjohn Co LLC, a subsidiary of Pfizer	SRN : B3610
Location : 7000 Portage Road	District : Kalamazoo
	County : KALAMAZOO
City : KALAMAZOO State: MI Zip Code : 49001	Compliance Status : Compliance
Source Class : MEGASITE	Staff : Dennis Dunlap
FCE Begin Date : 10/1/2011	FCE Completion Date : 9/11/2014
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/10/2014	Scheduled Inspection	Compliance	Scheduled inspection.
09/09/2014	Scheduled Inspection	Compliance	Scheduled inspection.
09/04/2014	CEM RATA	Compliance	RATA Test Plan.
08/06/2014	MACT (Part 63)	Compliance	
05/29/2014	MACT (Part 63)	Compliance	40 CFR Part 63 Subpart GGG 1st quarter periodical report. Includes cylinder gas audits.
04/03/2014	Other	Compliance	Review of annual and semi-annual ROP certification.
03/27/2014	MAERS	Compliance	
03/27/2014	MAERS	Compliance	
03/27/2014	MAERS	Compliance	
03/27/2014	ROP Annual Cert	Compliance	
03/27/2014	ROP SEMI 2 CERT	Compliance	
03/27/2014	CAM monitor downtime	Compliance	
03/27/2014	ROP Annual Cert	Compliance	
03/27/2014	ROP SEMI 2 CERT	Compliance	One deviation was reported. The water scrubber U-3 in Building 41 was found to be out of range on 8/8/13. It was reset. The water flow was actually out of range on the high side and should not have impacted emissions.
03/27/2014	ROP Annual Cert	Compliance	
03/27/2014	ROP SEMI 2 CERT	Compliance	One deviation was reported. On 8/18/14 a pressure filter in Building 155 was vented through the building scrubber instead of the thermal oxidizer.

Activity Date	Activity Type	Compliance Status	Comments
03/27/2014	CAM Excursions/Exceedances	Compliance	
02/28/2014	MACT (Part 63)	Compliance	MACT Subpart GGG
12/06/2013	CEM RATA	Compliance	Third quarter RATA for 4 TOC monitors for thermal oxidizers. The test was conducted on Sept. 16-17 for 40 CFR Part 63 Subpart GGG.
11/14/2013	MACT (Part 63)	Compliance	Pharmaceutical MACT periodic Report, 40 CFR Part 63 Subpart GGG.
09/25/2013	Scheduled Inspection	Compliance	Scheduled inspection (PCE).
09/24/2013	Scheduled Inspection	Compliance	Scheduled inspection (PCE).
09/19/2013	ROP Semi 1 Cert	Compliance	
09/19/2013	ROP Semi 1 Cert	Compliance	
09/19/2013	ROP Semi 1 Cert	Compliance	Four deviations were reported for Section 3. On 3/02/13 the CEMS was down due to maintenance activity. It was down for 6 hrs. 22 min. On 3/3/13 a failed auto-calibration was not discovered until the next day resulting in the CEMS being down for 21 hours. On 4/17/13 a new operating scenario was reported in the 1st quarter 2013 report. It should have been reported in the previous report. On 5/31/13 the knockout pots to Building 225 vented to the atmosphere for 3 hrs. 52 min. Emissions totaled 75 lbs of VOC. The cause was the failure in alarm and PLC status across different control system nodes. An emission limit was not exceeded.
09/19/2013	CAM Excursions/Exceedances	Compliance	Communication error resulted in brief bag leak detector alarm for Boilers 2 and 5.
09/19/2013	CAM monitor downtime	Compliance	
07/29/2013	MACT (Part 63)	Compliance	Pharmaceutical MACT Periodic Report for GGG.
05/15/2013	Other	Compliance	Review of ROP cert.
05/07/2013	Stack Test	Compliance	Required stack test for NOx on Boiler #8. The stack test occurred on 3/20/13. The NOx emission rate was 0.126 lb/mmBtu. The permit limit is 0.200 lb/mmBtu. The results were reviewed by TPU.
05/07/2013	MACT (Part 63)	Compliance	Periodic report for 40 CFR Part 63 Subpart GGG.

Activity Date	Activity Type	Compliance Status	Comments
05/02/2013	MACT (Part 63)	Compliance	Initial notification for DDDDD. All boilers subject.
04/02/2013	ROP SEMI 2 CERT	Compliance	Includes annual coal sampling results. The %S was 1.14%. The limit is 1.5%.
04/02/2013	ROP Annual Cert	Compliance	
04/02/2013	CAM Excursions/Exceedances	Compliance	
04/02/2013	CAM monitor downtime	Compliance	
04/02/2013	ROP SEMI 2 CERT	Compliance	
04/02/2013	ROP Annual Cert	Compliance	
04/02/2013	ROP SEMI 2 CERT	Compliance	Two deviations were reported for this period. The first was reported on 7/12/12 and involved a vacuum service pressure deviation. Testing indicated that there were no leaks. The second was reported on 12/31/12. This involved three valves that were previously not identified in the leak program but were supposed to be. They were added into the leak program. No leaks were detected.
04/02/2013	ROP Annual Cert	Compliance	
04/02/2013	MAERS	Compliance	
04/02/2013	MAERS	Compliance	
04/02/2013	MAERS	Compliance	
01/30/2013	MACT (Part 63)	Compliance	Pharmaceutical MACT (GGG) periodic report.
11/01/2012	MACT (Part 63)	Compliance	Third quarter MACT periodic report for 40 CFR Part 63 Subpart GGG.
10/02/2012	ROP Semi 1 Cert	Compliance	
10/02/2012	ROP Semi 1 Cert	Compliance	
10/02/2012	ROP Semi 1 Cert	Compliance	
10/02/2012	CAM Excursions/Exceedances	Compliance	
10/02/2012	CAM monitor downtime	Compliance	
09/20/2012	Scheduled Inspection	Compliance	PCE as part of FCE (1st year).
09/17/2012	CEM RATA	Compliance	RATA test plan for TOX.
08/29/2012	Scheduled Inspection	Compliance	PCE inspection of Building 41 (section 2 of ROP).
08/02/2012	MACT (Part 63)	Compliance	MACT Subpart GGG Periodical report, 2nd quarter.
05/02/2012	MACT (Part 63)	Compliance	First quarter periodic report for MACT Part 63 GGG.

Activity Date	Activity Type	Compliance Status	Comments
04/12/2012	MAERS	Compliance	
04/12/2012	MAERS	Compliance	
04/12/2012	MAERS	Compliance	
03/20/2012	Other	Compliance	Review of ROP certification report for 7/1/12-12/31/11.
03/19/2012	ROP SEMI 2 CERT	Compliance	
03/19/2012	ROP Annual Cert	Compliance	
03/19/2012	CAM monitor downtime	Compliance	
03/19/2012	ROP SEMI 2 CERT	Compliance	
03/19/2012	ROP Annual Cert	Compliance	
03/19/2012	ROP SEMI 2 CERT	Compliance	Five deviations were reported. On 11/1/11 a rotoclone was found to be plugged and this was repaired. On 7/20/11 a MACT Fugitive Pressure Test was conducted below its normal operating pressure. The vessel was put back into service, however, it was re-tested and found to be at the correct pressure. On 9/30/11 another Pressure Test was below normal pressure. This was corrected. On 10/10/11 a Pressure Test was supposed to have been after changes to equipment. This was found on 10/13/11 and a Pressure Test was done. An open ended valve was also found and capped. Personnel were retrained. On 8/13/11 a power failure occurred and a low temperature alarm for the TOX went on at 8:53 AM. At 10:00 AM production was shut down. The TOX was back on line at 10:52 AM.
03/19/2012	ROP Annual Cert	Compliance	
03/19/2012	ROP Other	Compliance	ROP certification form for MAERS.
03/19/2012	CAM Excursions/Exceedances	Compliance	
02/14/2012	CEM RATA	Compliance	Approval of CEMs RATA for the TOX performed on Sept. 27, 28, 2011.
02/01/2012	MACT (Part 63)	Compliance	Pharmaceutical MACT (GGG) Periodic Report.
02/01/2012	Scheduled Inspection	Compliance	Scheduled inspection.
11/29/2011	CEM RATA	Compliance	Final test report for CEM RATA for thermal oxidizer for total organic carbon.
11/03/2011	MACT (Part 63)	Compliance	Periodic report for 40 CFR Part 63 Subpart GGG.

Name: Dennis Dunlop Date: 9/11/14 Supervisor: MR 9/11/2014