

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

Monica

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 : 10/1/2014	FCE Completion Date : 9/20/2017
Comments : FCE is for the three-year period from 10/01/14 through 9/30/17. This is the three-year cycle for the megasite.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/19/2017	Scheduled Inspection	Compliance	Activity was records review for a portion of Section 3 of the ROP.
09/18/2017	ROP Semi 1 Cert	Compliance	No deviations were reported.
09/18/2017	ROP Semi 1 Cert	Compliance	No deviations were reported.
09/18/2017	ROP Semi 1 Cert	Compliance	Three deviations were reported. On 3/4/17 one of the two burners for the thermal oxidizer (tox) went out and the tox operating temp. dropped below 891 C. This lasted 4 hrs. and 55 min. before it was corrected. There was not an exceedance of the 20 ppm daily average. On 3/5/17, as a result of a burner being out on the tox, the tox was taken off line. Production was not notified for 21 minutes to take processes to a safe state. On 3/13/17 there was a missed daily calibration on the tox due to a clock resetting for daylight savings time.
09/18/2017	CAM monitor downtime	Compliance	No monitor downtime was reported.
09/18/2017	MACT (Part 63)	Compliance	Final test report for pilot scale fermentation process. The test was done to indicate that HAP emissions during the process did not meet the definition of a process vent for purposes of 40 CFR Part 63 Subpart GGG.

Activity Date	Activity Type	Compliance Status	Comments
09/18/2017	CAM Excursions/Exceedances	Compliance	The excursion events were caused by failed bag cages that poked holes in the bags. For Ash Transfer Vacuum Line #1 there were a total number of events over an 18 minute period. To correct the situation all the bags and cages were replaced. For Ash Transfer Vacuum Line #2, there were 4 events over a ten minute period. For correction all the bags and cages were replaced.
09/12/2017	CEMS Test Observation	Compliance	Observation of RATA. Two CEMS were tested on 9/12 (a Bernath and TECO), and one CEM was tested on 9/13 (Bernath). TOX 1 was operating on both days.
07/28/2017	MACT (Part 63)	Compliance	Subpart GGG periodic report. Includes semi-annual LDAR report. No deviations were reported.
07/28/2017	MACT (Part 63)	Compliance	Subpart DDDDD semiannual compliance report.
07/28/2017	NSPS (Part 60)	Compliance	Subpart Db quarterly report. 31 hours of CEMS downtime reported.
07/14/2017	MACT (Part 63)	Compliance	Performance test plan for MACT GGG. This is for a re-test of a fermentation process. The test is to determine whether the HAP emissions are over 50 ppm which would make it a process vent under GGG.
07/12/2017	Other	Compliance	Boiler 9 compliance with Appendix A of PTI 57-15. The Monitoring Plan was submitted on 7/10/15. DEQ letter regarding the Monitoring Plan was sent on 8/3/15. The RATA test plan was submitted on 1/27/16. The RATA occurred on 2/23/16. The RATA test report was received on 4/1/16.
06/14/2017	MACT (Part 63)	Compliance	Fermentation NESHAP Applicability Test Plan. Test to be performed July 17-19, 2017.
06/05/2017	NSPS (Part 60)	Compliance	No deviations were reported.
06/01/2017	MACT (Part 63)	Compliance	Subpart GGG Periodic Report. The facility reported that they were in compliance.
06/01/2017	NSPS (Part 60)	Compliance	Quarterly compliance report for 40 CFR Part 60 Subpart Db. The facility reported that they were in compliance.

Activity Date	Activity Type	Compliance Status	Comments
05/04/2017	Stack Test Observation	Compliance	Observation of test for HAPs during a fermentation process. The test was to determine if the fermentation vessel was a process vent according to 40 CFR Part 63 Subpart GGG.
05/03/2017	CEM RATA	Compliance	Boiler 9 RATA Test Report
03/21/2017	CAM monitor downtime	Compliance	CAM Semi-annual monitoring report
03/21/2017	ROP Annual Cert	Compliance	No deviations were reported.
03/21/2017	ROP SEMI 2 CERT	Compliance	No deviations were reported.
03/21/2017	ROP Annual Cert	Compliance	No deviations were reported.
03/21/2017	ROP SEMI 2 CERT	Compliance	No deviations were reported.
03/21/2017	ROP Annual Cert	Compliance	No deviations were reported.
03/21/2017	ROP SEMI 2 CERT	Compliance	Four deviations were reported. These included two for Pharmaceutical MACT Periodic Reporting, a visible emission survey that was not done on stack y-32, and a 12-month rolling time period calculation that was not being done.
03/21/2017	MAERS	Compliance	MAERS Report.
03/21/2017	CAM Excursions/Exceedances	Compliance	Five excursions were reported. One was on the ash silo bin vent, one on ash transfer vacuum line 1, and 2 on ash transfer vacuum line 2. These were of short duration and did not result in visible emissions.
03/07/2017	CEMS Test Observation	Compliance	NOx RATA on Boiler #9.
02/28/2017	MACT (Part 63)	Compliance	Fermentation NESHAP Applicability Test Plan. Test to occur on 5/4/17.
02/02/2017	MACT (Part 63)	Compliance	Boiler MACT stack test report for Boilers # 1, 5, and 6.
01/31/2017	MACT (Part 63)	Compliance	Periodic report for 40 CFR Part 63 Subpart GGG. Includes LDAR periodic report for 7/1/16 - 12/31/16. No deviations were reported.
01/31/2017	NSPS (Part 60)	Compliance	Fourth quarter compliance report for Boiler #9.
01/31/2017	MACT (Part 63)	Compliance	Semi-annual compliance report for 40 CFR Part 63 Subpart DDDDD. Includes Boilers #1, 6, 5, 3, 4, 7, 8, and 9. No deviations were reported.
01/10/2017	CEM RATA	Compliance	Boiler 9 NOx RATA Test Protocol. Boiler 9 installed under PTI 57-15.

Activity Date	Activity Type	Compliance Status	Comments
12/14/2016	Stack Test Observation	Compliance	Stack test observation on Boiler 5 for 40 CFR Part 63 Subpart DDDDD. Hg and HCl were being tested.
12/13/2016	Stack Test Observation	Compliance	Stack test observation on Boiler 5 for 40 CFR Part 63 Subpart DDDDD. CO and PM was being tested.
11/07/2016	MACT (Part 63)	Compliance	Third quarter periodic report for the pharmaceutical MACT Subpart GGG. No deviations were reported.
11/02/2016	CEM RATA	Compliance	RATA Test Report, Subpart GGG
11/01/2016	Scheduled Inspection	Compliance	Scheduled inspection to cover LDAR for MACT GGG.
10/27/2016	Scheduled Inspection	Compliance	The inspection focused on wastewater provisions of 40 CFR Part 63 Subpart GGG.
10/21/2016	Stack Test	Compliance	Stack testing protocol for coal-fired boilers 1, 5, and 6. The testing is scheduled for Dec. 11-16, 2016. The testing is for compliance with 40 CFR Part 63 Subpart DDDDD.
09/15/2016	ROP Semi 1 Cert	Compliance	No deviations were reported.
09/15/2016	ROP Semi 1 Cert	Compliance	No deviations were reported.
09/15/2016	ROP Semi 1 Cert	Compliance	Two deviations were reported for Section 3. The first occurred on 2/3/16 when the blowers for the thermal oxidizer failed. All operations were taken to a safe state except two. This included the south tank farm and the Chemical Process Wastewater Management steam stripper. Modeling indicated that no emission limits were exceeded. The outage lasted 59 minutes. The other deviation occurred on 5/6/16 when two risk management plan inspections were performed by inspectors who were not certified.
09/15/2016	CAM monitor downtime	Compliance	No monitor downtime was reported.
09/15/2016	CAM Excursions/Exceedances	Compliance	An excursion was reported on ash transfer line #2 involving a high differential pressure alarm on the transmitter. The bag house was inspected. The transmitter may have been dirty. The bag leak detector did not alarm.
09/13/2016	CEMS Test Observation	Compliance	Observation of RATA.

Activity Date	Activity Type	Compliance Status	Comments
08/15/2016	MACT (Part 63)	Compliance	MACT Periodic Report, Subpart GGG. No deviations were reported. Includes LDAR report.
08/15/2016	MACT (Part 63)		Boiler MACT semiannual compliance report, subpart DDDDD. No deviations were reported.
08/15/2016	NSPS (Part 60)		NSPS Compliance Report, Subpart Db. No deviations were reported.
08/12/2016	CEM RATA	Compliance	RATA Test Plan for the regenerative thermal oxidizers.
08/03/2016	Scheduled Inspection	Compliance	Day 2 of Building 41.
08/02/2016	Scheduled Inspection	Compliance	Day 1 inspection of Building 41.
07/06/2016	Other	Compliance	
05/10/2016	MACT (Part 63)	Compliance	Subpart GGG. No deviations were reported.
05/03/2016	CEM RATA	Compliance	RATA test report for Boiler #9. Test was performed on 2/23/16.
03/28/2016	MAERS	Compliance	
03/28/2016	MAERS	Compliance	
03/28/2016	MAERS	Compliance	
03/28/2016	ROP SEMI 2 CERT	Compliance	One deviation was reported. On 7/4/15 the boiler 3 bag house was bypassed due to an electronics issue. The low temp. alarm went off and the bag house was manually put back into operation. The electronics issue was corrected. The by pass lasted for about 46 minutes.
03/28/2016	ROP Annual Cert	Compliance	No deviations were reported.
03/28/2016	CAM monitor downtime	Compliance	CAM Semi-annual Monitoring Report. No monitor downtime was reported.
03/28/2016	ROP SEMI 2 CERT	Compliance	No deviations were reported.
03/28/2016	ROP Annual Cert	Compliance	No deviations were reported.
03/28/2016	ROP SEMI 2 CERT	Compliance	One deviation was reported on 8/24/15. A power outage caused some buildings to bypass the thermal oxidizers. Processes were taken to a safe state. Building 225 and one process was not shut down, resulting in approx. 39 pounds of VOC vented to the atmosphere. AQD will follow up to get more information on this episode. The bypass lasted for 40 minutes.
03/28/2016	ROP Annual Cert	Compliance	No deviations were reported.

Activity Date	Activity Type	Compliance Status	Comments
03/28/2016	CAM Excursions/Exceedances	Compliance	No excursions were reported.
02/17/2016	Stack Test	Compliance	Boiler MACT Performance Test Report for coal-fired boilers 1, 3, 5, and 6. Boiler 4 is a limited use boiler and was not tested.
02/17/2016	MACT (Part 63)	Compliance	Boiler MACT Subpart DDDDD Notice of Compliance Status based on performance test for coal-fired boilers 1, 3, 5, and 6. Boilers 1 and 6 are part of the same gas stream. Boiler 4 is a limited use boiler and was not tested.
02/04/2016	MACT (Part 63)	Compliance	Subpart GGG periodic report. No deviations were reported.
02/01/2016	NSPS (Part 60)	Compliance	Notification of start-up of the 144.5 MMBtu/hr natural gas boiler covered by PTI 57-15 and 40 CFR Part 69 Subpart Db.
02/01/2016	CEM RATA	Compliance	Notification of Intent to conduct RATA for boiler 9 installed under PTI 57-15.
11/02/2015	CEM RATA	Compliance	RATA test report for TOC analyzers for thermal oxidizer. The test was conducted on Sept. 9-10, 2015.
11/02/2015	MACT (Part 63)	Compliance	Third quarter periodic report for 40 CFR Part 63 Subpart GGG. No deviations were reported.
10/28/2015	Stack Test	Compliance	Test protocol for boiler stack test to analyze for HCl in accordance with DDDDD. The testing is scheduled for Dec. 8-13.
10/28/2015	NSPS (Part 60)	Compliance	Monitoring plan for Boiler #9.
10/28/2015	NSPS (Part 60)	Compliance	Alternative monitoring method request for HCl for DDDDD.
09/24/2015	ROP Semi 1 Cert	Compliance	No deviations were reported.
09/24/2015	ROP Semi 1 Cert	Compliance	No deviations were reported.
09/24/2015	CAM Excursions/Exceedances	Compliance	No deviations were reported.
09/22/2015	ROP Semi 1 Cert	Compliance	One deviation was reported. A drying process in Building 91 ran for 33 minutes on 2/5/15 while building was not connected to the thermal oxidizer because of a malfunction.
09/09/2015	Scheduled Inspection	Compliance	Scheduled inspection.
09/09/2015	CEMS Test Observation	Compliance	RATA on TO on Sept. 9 and 10.

Activity Date	Activity Type	Compliance Status	Comments
08/03/2015	MACT (Part 63)	Compliance	Subpart GGG. No deviations were reported.
08/03/2015	NSR Emissions Report	Compliance	Monitoring Plan for the NOx and O2 CEMS for Boiler EUEBLR43-9-S1 for Permit 57-15.
07/21/2015	CEM RATA	Compliance	RATA test plan for thermal oxidizers.
05/14/2015	MACT (Part 63)	Compliance	Periodic report for the MACT GGG. No deviations were reported.
05/12/2015	MAERS	Compliance	
03/13/2015	ROP SEMI 2 CERT	Compliance	No deviations were reported.
03/13/2015	ROP SEMI 2 CERT	Compliance	No deviations were reported.
03/13/2015	ROP SEMI 2 CERT	Compliance	Two deviations were reported regarding the Fugitive Emission Program. The first occurred on 7/9/14 and involved an agitator that was repaired after 6 days instead of 5. The second involved a form that was not completed after a filter failed a pressure test on 8/26/14.
03/13/2015	ROP Annual Cert	Compliance	No deviations were reported.
03/13/2015	ROP Annual Cert	Compliance	No deviations were reported.
03/13/2015	ROP Annual Cert	Compliance	No deviations were reported.
03/13/2015	CAM monitor downtime	Compliance	There was no monitor down time reported.
03/13/2015	CAM Excursions/Exceedances	Compliance	Two alarms were noted during the reporting period. The first was on the ash silo bin vent and lasted for 1 minute. No issues were observed. The second occurred on the bag leak detector for Boilers 3 and 4 for two minutes. No issues were observed.
02/03/2015	MACT (Part 63)	Compliance	No deviations were reported.
01/14/2015	Scheduled Inspection	Compliance	Scheduled inspection.
01/01/2015	CAM monitor downtime	Compliance	There was no monitor downtime reported.
10/29/2014	MACT (Part 63)	Compliance	Periodic report for 40 CFR Part 63 Subpart GGG. No deviations were reported.

Name: Dennis Dunlap Date: 9/20/17 Supervisor: MS 9/20/2017