

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

B361026819

FACILITY: Pharmacia & Upjohn Co LLC, a subsidiary of Pfizer	SRN / ID: B3610
LOCATION: 7000 Portage Road, KALAMAZOO	DISTRICT: Kalamazoo
CITY: KALAMAZOO	COUNTY: KALAMAZOO
CONTACT: Pamela Hauer, Senior Environmental H & S Specialist	ACTIVITY DATE: 09/10/2014
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance
SUBJECT: Scheduled inspection.	SOURCE CLASS: MEGASITE
RESOLVED COMPLAINTS:	

This was an announced inspection. Scott Zabik is the contact person. The inspection brochure was handed out.

The purpose of this inspection was to focus on the wastewater provisions of 40 CFR Part 63 Subpart GGG. This inspection completes the three-year inspection cycle.

The Z-line is a piping system that brings affected wastewater to the stream stripper. This about 50,000-100,000 gallons per day. "Affected" is the designation in GGG for wastewater that contains certain concentrations of soluble and partially soluble HAP. There are three holding tanks, ST-320, Tank 5030, and Tank 5031. The steam stripper separates out the solvents and these go to tank ST-321 or tank 5032. From here it goes through the R-line to the solvent recovery area. The bottoms from the steam stripper go to tanks ST-309 or ST-310 for pH adjustment. Solids are removed in a clarifier. The wastewater goes to filtrate tank ST-317 or ST-318 and then to the city sewer or in some cases to a deep injection well. The wastewater going to the city is sampled periodically. It was sampled in March, 2014, and Sept., 2014.

There are two other wastewater lines here. The SJ line goes to tank ST-319. The J-line goes to tank ST-312. The wastewater from these lines go to deep injection wells.

Distillation column 8 is for acetone. The wastewater from this column discharges directly to the sanitary sewer.

The solvent recovery area has 7 distillation columns to recover solvents. There are a number of holding tanks and solvent tanks in this area vented to the TOX. They are connected to a primary condenser and vent condenser before going to the TOX.

NAME Dennis DunlapDATE 9/11/14SUPERVISOR ma 9/11/2014

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

B361026803

FACILITY: Pharmacia & Upjohn Co LLC, a subsidiary of Pfizer	SRN / ID: B3610
LOCATION: 7000 Portage Road, KALAMAZOO	DISTRICT: Kalamazoo
CITY: KALAMAZOO	COUNTY: KALAMAZOO
CONTACT: Pamela Hauer, Senior Environmental H & S Specialist	ACTIVITY DATE: 09/09/2014
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance
SUBJECT: Scheduled inspection.	SOURCE CLASS: MEGASITE
RESOLVED COMPLAINTS:	

This was an announced inspection. Pam Hauer is the contact person. The inspection brochure was handed out.

The purpose of this inspection was to evaluate compliance with Table FGCRALLTOX-S3 in the ROP. This includes the thermal oxidizer. A RATA on the thermal oxidizer was being performed. TOX 2 was being operated for the RATA. TOX 1 is down for maintenance activities. This is a two day RATA. On day 1 Bernath 4842 and TECO 8132 CEMs are evaluated. These are then switched with TECO 4548 and Bernath 4779 for day 2. On Day 1 10 21-minute runs were completed: Run 1: 8:00-8:21; Run 2 8:26-8:47; Run 3 8:53-9:14; Run 4 9:19-9:40; Run 5 9:47-10:08; Run 7 10:46-11:07; Run 8 11:15-11:36. At 10 AM the flow rate to the TOX was 2363 scfm. This is over 50% load. The 50% load flow rate is 1300 scfm. The ppm being measured at the stack was about 0.6 ppm.

There is a control panel for the TOX. For flow rate there is a 3600 scfm high alarm and a 4000 high high alarm. The permit limit is 5200 scfm. For the permit the alarm must not be set higher than 4680 scfm. For July, 2014, the flow rate was in compliance.

The TOX min. temp.in the permit is 1635 degrees F (891 degrees C). The TOX was reading 937. The target set point is 940. The alarm is set at 910.

The minimum flow rate to the scrubber in the permit is 750 gpm. The flow rate was reading 900 gpm. Alarms are set at 800 gpm and 750 gpm. For July, 2014, the daily average flow rate was 900 gpm.

The scrubber water minimum pH value is 7.0. The pH was reading 7.89. The alarm is set at 7.25. The daily average pH value for July was above 7.0.

In July, 2014, the CEM daily average was less than 1 ppm. The permit limit is 20 ppm. The 12-month rolling average emissions from the TOX were calculated to be 0.4-0.7 tons. The permit limit is 37 tons.

In FGCRALLTOX-S3 there are OVC limits (toxic air contaminants other than methylene chloride, acetone, and other VOC) before control with the thermal oxidizer for Region I, II, III, and IV buildings, as well as after control. The limits are based on a model. As long as each each Region adheres to the model the emission limits will not be exceeded. The models need to be checked if a new process is proposed.

NAME Dennis DunlapDATE 9/11/14SUPERVISOR UB 9/10/2014