

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

B361028286

FACILITY: Pharmacia & Upjohn Co LLC, a subsidiary of Pfizer		SRN / ID: B3610
LOCATION: 7000 Portage Road, KALAMAZOO		DISTRICT: Kalamazoo
CITY: KALAMAZOO		COUNTY: KALAMAZOO
CONTACT: Jeff Robey, Senior Specialist EH & S		ACTIVITY DATE: 01/14/2015
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MEGASITE
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

This was an announced inspection. The inspection brochure was handed out. This inspection was for Section I of the ROP. This is the first year of the the three-year inspection cycle.

At the time of the inspection Boilers #1, #3, #4, #6, #7, and #8 were operating (all but #5). Boilers #7 and #8 are natural gas-fired but have the capability of being fired on oil. However, there are no oil tanks on site and they haven't been run on oil for about 20 years.

Fly ash is collected from the five coal-fired boilers. This is transferred through vacuum lines to the ash silo. There are two dust collectors on the ash transfer vacuum lines. These are monitored by a diff. pressure gage. The readings are electronically recorded. The range is set at 0.1 - 7.0. If the reading is outside this range an alarm is indicated on the screen in the control room. In 2014 there were about seven alarms on this system. These were investigated and corrected. It appeared that the alarms were caused by glitches or equipment problems, not emissions. The ash transfer lines emit to the atmosphere after passing through the dust collectors. No visible emission were seen at that point. The silo has a bin vent dust collector. This has a photohelic monitor that is recorded electronically. If the gage is tripped an alarm appears on the screen in the control room. One alarm occurred on 7/14/14 for one minute. Upon investigation no issues were seen. There are three dust collectors for the five coal-fired boilers. These have bag leak detectors that are recorded electronically. On 8/20/14 an alarm was tripped for Baghouse 3. Upon investigation no issues were seen.

The coal-fired boilers use 2-3 railroad cars of coal each day. Coal is unloaded through the bottom of the car through a grate into a hopper. A conveyor then transports the coal to a hopper above the boilers. This lower room is enclosed and has pick-up points controlled by a rotoclone. This is a Rule 290 group in the ROP called EUEB43COALUNLOADING-S1. Particulate emissions are calculated for this group. A coal sample was taken from coal entering the four operating boilers. This will be analyzed for % Sulfur and BTU. The facility has records for each delivery of coal and the yearly composite coal sampling. The % Sulfur was below 1%.

A lime-injection system is currently being installed on the coal-fired boilers to control HCl for the Boiler MACT (DDDDD). It is planned to stack test the boilers in 2015 for the MACT. A permit application may be submitted soon for a new gas-fired boiler. It is planned to replace the diff. pressure gages on the ash transfer vacuum lines with bag leak detectors.

Boiler #5 has flue gas recirculation. The parameters for this is controlled from the screen in the control room.

There is a cold cleaner in the boiler building. The lid was closed and the rules were posted.

There are 8 emergency generators. Four of these are fire pumps subject to the NSPS IIII (two in Building 444 and two in building 199). All the generators use ultra low sulfur fuel. The supplier specification sheet lists sulfur content at 15 ppm.

EUB51GENERATOR-S1 has conditions in the ROP but is not subject to MACT or NSPS. The NOx emissions are being calculated and hours of operation are recorded.

EUB38GENERATOR-S1 and EUB186GENERATOR-S1 are subject to ZZZZ. For the MACT the oil is changed annually and air cleaners, belts and hoses are inspected or replaced annually.

EUB76GENERATOR-S1 is subject to the NSPS JJJJ. This is a propane-fired generator.

NAME Dennis DurlapDATE 1/15/15SUPERVISOR MA - 1/15/2015