

Monica

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

B361037429

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: 11/01/2016
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MEGASITE
SUBJECT: Scheduled inspection to cover LDAR for MACT GGG.		
RESOLVED COMPLAINTS:		

This was a scheduled inspection. Dennis Dunlap and Monica Brothers were the inspectors for AQD. Jeff Robey was the contact person for Pfizer. The purpose of this inspection was to review the leak detection provisions of 40 CFR 63.1255 (Subpart GGG) and 40 CFR Part 63 Subpart H. This inspection is a partial compliance evaluation (PCE) and is in the last year of the three year inspection cycle.

The leak detection program (LDAR) is a continual process. On this day connectors were being monitored in Building 335. A monitor tech from Summit conducts the monitoring with a monitor using Method 21. Based on information from the Periodic Report submitted on 7/29/16, connectors are on a 4-year inspection cycle. The current cycle began in October, 2015.

For Building 335, there are maps that show the locations of the connectors to be monitored. The tester is equipped with a digital recording device. Each connector is required to be monitored with the instrument for a minimum of 20 seconds. The digital device is programmed with the 20 second interval and will not allow the connector testing to be finalized unless the 20 seconds is completed. The tester will pass the probe around the connector and go back to the highest reading in this 20-second interval. When finished the test is stored electronically. A leak for a connector is defined as a reading of 500 ppm or greater. The instrument is calibrated at the beginning of the day, at mid day, and at the end of the day. The calibration gases are at 2000 pm (low range) and 10,000 ppm (high range).

There are maps for all the locations of connectors, valves, pumps, etc. at the facility. The data from the monitoring is stored electronically.

Pumps and agitators are currently monitored on a quarterly monitoring cycle and a weekly visible leak check. This weekly check is performed by the operators in each area.; valves are on an annual monitoring cycle; batch product-process equipment trains are pressure tested once/yr with nitrogen gas. If the equipment train is reconfigured for a different product it is re-tested. The pressure is checked with a digital monometer that is calibrated annually. The pressure cannot lose 0.25 psi over a 15-minute period. ; pressure relief valves are monitored after a pressure release, after opening for preventative maintenance, or replaced, installed, or added to the LDAR program. Blind flanges and plugs are not required to be monitored. There are no compressors required to be monitored.

A summary of the program is required semi-annually in the periodic report. The last update was received on 7/29/16. According to the report 6,003 valves were monitored during the 6-month period covered in the report. There were 26 leaking valves (500 ppm or more), and the frequency to monitor all valves is one year. Leaking valves are required to be repaired within 15 days, with the first repair attempt made within five days. A recheck is required to be done within 3 months after the repair was made. Records were reviewed for 2016 for valves that were monitored. For the records checked it appeared that leaking valves were repaired within the 15-day time period and the recheck was done within three months.

Pumps and agitators are also included in the report. Pumps are designated leakers at 2,000 ppm and above, and agitators 10,000 ppm and above. A total of two leaking pumps and two leaking agitators were reported. These were repaired within the 15 day time period.

A total of 3,770 connectors were monitored for leaks during the 6-month period covered by the report. A total of 14 leakers were found. These were repaired within the 15-day time period. Connectors are not required to be re-checked within three months. Records were checked for connectors monitored in

2016. For the leaking connectors checked, these were repaired within the 15-day time period.

The 2016 records were also reviewed for the pressure tests for product process equipment trains (yearly test) and partial trains where the equipment was reconfigured. These records appeared to be in order.

NAME Dennis Dunlap

DATE 11/7/16

SUPERVISOR MD 11/7/2016