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

B361041533

FACILITY: Pharmacia & Upjohn Co LLC, a subsidiary of Pfizer		SRN / ID: B3610
LOCATION: 7000 Portage Road, KALAMAZOO		DISTRICT: Kalamazoo
CITY: KALAMAZOO		COUNTY: KALAMAZOO
CONTACT: John Ring , Manager, EHS		ACTIVITY DATE: 09/19/2017
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MEGASITE
SUBJECT: Activity was records review for a portion of Section 3 of the ROP.		
RESOLVED COMPLAINTS:		

This was an activity to finish records review for a portion of Section 3 of the ROP. John Ring was the contact person for Pfizer. Dennis Dunlap and Monica Brothers were there from AQD.

The emission units/flexible groups included in the records review were the following: EUCR138, EUCR1127, EUCR1155, EUCR1166, EUCR1195, EUCR244, EUCR2149, EUCR373, EUCR3173, EUCR3207, EUCR3225, EUCR466, EUCR476, EUCR491COM, EUCR4335, EUC38R6ALL, EUC120R6ALL, FGCRALLTOX, FGCR6FERM, and FGRULE290.

The emission units (not flexible groups) have a particulate limit based pounds of particulate per lot and allowed number of lots per month. EUCR491COM and EUCR3225 also have a VOC limit based on pounds of VOC per lot and number of lots. Records were reviewed for 2016 and 2017. The records showed compliance with these emission limits.

EUCR476 has a particulate emission limit based on pounds of product produced and pounds of particulate emitted per 1,000 pounds of product (0.000145). It appears that this number in Appendix 4 should be 0.145. The original PTI would need to be checked for an error. Also, for EUCR491COM the particulate emission limit is 90 pounds per month. When the pounds per lot (2.5) and lots per month (30) are multiplied, it equals 75 and not 90. The 90 may be in error.

The flexible group FGCR6FERM has three VOC and acetone emission limits (13 ppm by volume, monthly calculation, tons/month, and tpy. Records from 2016 and 2017 indicated compliance. There is also a maximum aeration rate of 150,000 scfm supplied to all fermentation vessels combined. Records showed compliance.

Records were reviewed for the Section 3 Rule 290 groups. This includes about 33 groups. EUCR1DRUMPUMPING (Check spelling) was combined with the following 290 groups: EUCR2149TRAN1053; EUCR2149TRAN1070; EUCR149EX8; EUCR149EX40; EUCR149SCRB1004; EUCR149SCRB1005; EUCR244DRUMPUMPING; EUCR3173DRUMPUMPING; EUCR3225DRUMPUMPING; EUCR4335DRUMPUMPING; EUCR466DRUMPUMPING; EUCR491DRUMPUMPING.

It appears that EUC335ST745, EUCR4335DRUMFILLING (not in ROP) and EUC41MICH33 are no longer active.

The following 290 groups need to be added to the ROP: EUCR138OT384; EUCR138T112; EUCR138TVENT; EUCR2149TOTEFILLING; EUCR1195TANK1060.

Records from 2016-17 for the Rule 290 groups indicated compliance.

#### FGCRALLTOX

FGCRALLTOX includes the thermal oxidizers. One thermal oxidizer is always operating and the other is back-up. There is a quench and scrubber after the thermal oxidizer to control HCl emissions. Total hydrocarbon emissions are monitored with a CEM. There is a VOC limit of 20 ppm based on a 24-hour average and a mass VOC limit of 37 tons per rolling time period. The CEM is used to calculate the mass emissions. Based on records for 2016-17, the thermal oxidizer was in compliance with these limits.

Each of the four regions has an OVC limit (toxic air contaminants as defined in Rule 120, other than methylene chloride, acetone and other VOC). Other VOC is VOC, methylene chloride, and acetone. For this Pfizer has calculated the worst-case scenario for each of the regions and this essentially is the emission limit. There was some discussion whether the actual emissions need to be calculated for each of the regions. The conclusion was that special condition VI.10. does not specifically state that this needs to be done for each region. What they are doing seems to satisfy the condition. Pfizer also uses Emission Master to track emissions for each lot produced before control and this data could possibly be used to satisfy the condition, separating out OVC. This issue may be revisited during the next ROP renewal.

Pfizer also had calculations for HCl, dioxins, and furans after control to indicate compliance with the emission limits.

NAME Denise Dunlap

DATE 9/20/17

SUPERVISOR MO 9/20/2017