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

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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: 08/30/2018
STAFF: Monica Brothers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MEGASITE
SUBJECT: Scheduled Inspection	n: ROP Section 1	
RESOLVED COMPLAINTS:		

This was an announced scheduled inspection. This inspection was the first year's inspection of the three-year inspection cycle, and Section 1 of Pfizer's ROP and PTI #57-15 were covered. I arrived at the facility at 9:00am and met with Jeff Robey, Senior Specialist EHS. We first went to the boiler control room where I asked Jeff some initial questions and looked at some records before the facility tour.

# EUE43-ASH-S1:

This is the ash handling equipment for boilers 1,3,4,5, and 6, and associated pulse jet fabric filters. The ash vacuum system has two baghouses, and there is a separate baghouse for the ash storage silo. The facility has a bag leak detection system in place, which trips an alarm if a leak is detected. Their permit requires that they keep records of each alarm that occurs from the ash transfer vacuum system and the ash silo vent. They are keeping these records, along with a description of each issue and the corrective actions taken to remedy the problem. They have a Malfunction Abatement Plan that they follow whenever an alarm is tripped.

## EUEBLR 43-7-S1:

This is a 120,000 lbs steam/hr natural gas boiler with No. 2 fuel oil as backup. They have not run fuel oil in over twenty years and do not have any oil storage tanks on-site. This unit was running at 49,489.10 lbs steam/hr at the time of inspection.

# EUEBLR43-8-S1:

This is a 120,000 lbs steam/hr natural gas boiler with No. 5 fuel oil as backup. They have not run fuel oil in over twenty years and do not have any oil storage tanks on-site. This unit was running at 52,651.40 lbs steam/hr at the time of inspection.

### PTI #57-15: EUEBLR43-9-S1:

This is a 120,000 lbs steam/hr natural gas boiler with maximum heat input capacity of 144.7 MMBTU/hr. It has low NOx burners and flue gas recirculation as its pollution control equipment, and only natural gas may be burned in this unit. It has a continuously operating oxygen trim system and a CEMS that continuously records NOx emissions. The unit was operating at 63,508.9 lbs steam/hr during the inspection. PTI #57-15 limits the unit to 0.20 lb/MMBTU on a thirty-day average. The facility is keeping these records, and the highest value I observed was 0.044 lb/MMBTU. This PTI also limits the unit to 32.0 TPY on a 12-month rolling timescale. They are keeping these records. The highest number I saw for 2018 was during June, and it was 11.7 TPY.

## FGEBLR43-1-6-S1:

Pfizer is currently in the process of getting rid of all of their coal-fired boilers. Boilers 3 and 4 have been removed, and Boiler 2 has been decommissioned for many years and will be the next one removed. They are planning on removing Boilers 1,5, and 6 by 2020. They have recently applied for a permit for two new natural gas boilers with propane backup, each rated at 143.2 MMBTU/hr. Part of this project will also be to install some new propane tanks for storage.

During the inspection, coal-fired boilers 1,5, and 6 were not operating, and Jeff said that they would not be running them until November. Boilers 5 and 6 are 90,000 lbs steam/hr (110.81 MMBTU/hr) boilers with flue gas recirculation to reduce NOx emissions, and Boiler 1 is a 60,000 lbs steam/hr (73.87 MMBTU/hr) boiler. Boilers 1 and 6 share a stack. Each of these boilers has an economizer for waste heat recovery and exhaust gas temp reduction, and also have multiclones and fabric filters for PM control. There is also a lime injection system to control HCL.

The fabric filters have bag leak detection alarms and they must not sound more than 5% of operating time in a 6-month period. Jeff showed me the alarm records, which showed that they are in compliance with these requirements. In each alarm case, the MAP was followed, and corrective actions were taken. Jeff also showed me records of the coal sulfur content analysis. They are required to keep records of an annual composite coal sample analysis, as well as a % sulfur content analysis for each delivery. The limit is 1.5% sulfur by weight, and their records showed that they were under this limit. The last time they received coal was in 2016, and the sulfur content was 1.03%.

## EUB51GENERATOR-S1:

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This is a diesel-fired reciprocating engine with a max capacity of 1.25MW. It is used only as an emergency generator and it is not subject to MACT or NSPS. Only No.2 fuel oil is used in the unit. The last time it was run was on August 18, 2018 for monthly testing. After that testing, the non-resettable hour meter read 251.4 hours. The unit uses ultra-low (15ppm) sulfur diesel. The permit requires that they keep track of the date, duration, and description of malfunctions and corrective maintenance, and Jeff showed me that they are keeping these records. This unit also has a NOx emissions limit of 12.9 TPY on a 12-month rolling timescale. Records showed that they are under this limit, with the maximum being 0.61 TPY in November 2017. They are also under their operating hours limit of 500 hours per 12-month rolling.

### **FGCOLDCLEANER-S1:**

There are 13 cold cleaners associated with Section 1 of the ROP. Jeff showed me a list of them that showed the specifications for each unit. Each unit has an identifier, date of installation, air/vapor interface area, reid vapor pressure, and solvent type. The units use either Safety-Kleen Premium Gold or Isopar-L. None of the units are agitated or heated. During the facility tour, I observed six of these cold cleaners, and each had rules posted and the lid closed.

## FGRULE290-S1:

This flexible group is for EUELECTROPOLISH-S1 and EUEB43COALUNLOADING-S1. Jeff showed me the Rule 290 records for each of these emission units, which specified each contaminant emitted, whether it was controlled or uncontrolled, the ITSL/IRSL, and the calculated actual emissions. The records showed that they were under the required limits. The coal unloading process is controlled by a rotoclone. The highest numbers I observed for particulate matter emissions from this process were 0.29 lbs/month for March 2018 and 0.25 lbs/month for January 2017.

### **FG-RICEMACT:**

These emergency generators are subject to Subpart ZZZZ. Jeff is keeping track of the hours of operation, the purpose of operation, the occurrences of any malfunctions and corrective actions taken, and maintenance records for each unit. These records show that they are under the hours-limits and are doing appropriate maintenance. During the facility tour, I observed the emergency generator for the fire station (Building 186), which had a non-resettable hour meter that read 391.8 hours. This unit runs on diesel fuel.

### FG-RICE-CI-NSPS:

This flexible group consists of four fire pumps that are subject to Subpart IIII. Jeff has records of the hours of operation for each unit, and they are under the hours-limits set forth in this subpart. Jeff also showed me that the units use only ultra-low sulfur diesel (15ppm). During the inspection, Pump 2 showed 338.6 hours, Pump 3 showed 322.4 hours, and Pump 4 showed 310.4 hours. Pump 1 was also observed but the hours were difficult to find on the unit's digital screen. Jeff showed me that these hours are being recorded each month and put into a spreadsheet.

### FG-RICE-SI-NSPS:

This flexible group consists of one propane-fired emergency generator that is subject to Subpart JJJJ. Jeff is keeping track of the hours of operation, the purpose of operation, the occurrences of any

malfunctions and corrective actions taken, and maintenance records for the unit. These records show that they are under the hours-limits and are doing appropriate maintenance. During the facility tour, I observed this 14kW emergency generator, which is for Building 76. It has run for 7.52 hours so far in 2018 and ran a total of 9.33 hours for 2017.

The facility seemed to be in compliance at the time of inspection.

NAME Monin Mas

DATE 9/21/18 SUPERVISOR MA 9/24/2018

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