

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

B714937709

FACILITY: ZOETIS LLC		SRN / ID: B7149
LOCATION: 2605 EAST KILGORE RD, KALAMAZOO		DISTRICT: Kalamazoo
CITY: KALAMAZOO		COUNTY: KALAMAZOO
CONTACT: Latonia Raines , EHS Manager		ACTIVITY DATE: 11/02/2016
STAFF: Monica Brothers	COMPLIANCE STATUS: Compliance	
SUBJECT: Unannounced scheduled inspection		SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:		

This was an unannounced scheduled inspection. Zoetis is a minor source facility that makes a variety of pharmaceutical drugs for animals. They had long been a part of Pfizer until 2013 when the company became a completely separate entity. They are currently operating under PTI# 30-05B.

Staff (Monica Brothers) arrived at the facility at about 1:10pm and met with a number of people from the environmental health and safety team, including Mike Brannen. The EHS Manager, Latonia Raines was out of the office at the time of the inspection. She is the person who does the recordkeeping, so records were emailed to me after the inspection and examined at a later date.

Solvent Tanks:

We began the inspection at the solvent tanks that are located outside. EUTANK-302, a 10,000 gallon storage tank, and EUTANK-303, a 15,000 gallon storage tank, are both used to store isopropyl alcohol (IPA). EUTANK -301, a 10,000 gallon storage tank, holds propylene glycol. EUTANK-304, a 6,000 gallon storage tank, holds hazardous solvent waste. EUTANK-305, a 2,000 gallon storage tank, holds aqueous waste. None of the tanks hold ethyl alcohol any longer. They still use ethyl alcohol, but they now receive it in drums instead.

Boilers:

Next, we went into the boiler room. They have three boilers. One is a Bryan flexible tube boiler that burns natural gas. It is a 4400 MBH boiler that was built in 1986. The model number is RV550 S 250 FDG, and the serial number is 61991. The other two boilers are Babcock and Wilcox natural gas boilers that were built in 1953. They each have a capacity of 14,000lbs. All of these boilers are exempt from permitting under Rule 282(b).

Condenser and Rotoclones:

We then went to find the condenser. The temperature during the inspection was reading about 22°C. According to their permit, the condenser temperature is required to be below 25°C at all times. This building also contains the two wet centrifugal rotoclones, which we observed. These rotoclones service the weigh areas, and the condenser services the compounding and filling areas.

Emergency Generator:

They have one emergency generator at the facility. It is a Cummins Onan unit that has a 150kW capacity and an installation date of 1992. The model number is 150.ODVE-15R/26985A, the serial number is D850759407, and the hour meter reads 72.6 hours. It fires diesel fuel, for which they have a 250 gallon storage tank. Because of the installation date, this emergency generator is considered an existing unit and is therefore not subject to NSPS JJJJ. For the MACT Subpart ZZZZ, it is considered an existing unit at an area source, and therefore has no requirements under 63.6590(b)(3).

Parts Washer:

There is one parts washer. It is a Safety-Kleen unit and is serviced by Safety-Kleen. The lid is down while not in use and the instructions are posted outside of the unit. I obtained the MSDS for the solvent, which is 100% VOC, but is below the Reid vapor pressure level for needing a mechanically assisted lid.

Recordkeeping:

1. The condenser exhaust gas temperature is required to be at 25°C or less at all times and must be recorded on a daily basis.
 - a. Latonia provided a graph that shows the condenser temperature readings from January 1, 2014 to November 8, 2016, and the temperatures never rose to above 25°C. The graph shows compliance with this permit requirement.
2. The ethyl alcohol usage is limited to 21 tons per twelve month rolling time period.
 - a. According to the excel spreadsheet the Latonia submitted to me, their highest usage for the past two years was 2.5 tons. They are far under their permit limit for this and are therefore in compliance with this permit requirement.
3. The isopropyl alcohol usage is limited to 3440 tons per twelve month rolling time period.
 - a. Their highest usage for the past two years was 410.5 tons. They are far under their permit limit for this and are therefore in compliance with this permit requirement.
4. The VOC emissions are limited to 17.5 tons per twelve month rolling time period.
 - a. Their highest VOC emission for the past two years was about 2.2 tons per twelve month rolling time period. They are far under their permit limit for this and are therefore in compliance with this permit requirement.

At the time of inspection, Zoetis seemed to be in compliance with their permit conditions.

NAME Monica Burt

DATE 11/23/16

SUPERVISOR MA 11/28/2016