

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N528661212

FACILITY: ROBERT BOSCH FUEL SYSTEMS, L.L.C.	SRN / ID: N5286
LOCATION: 4700 Broadmoor SE, Suite 100, KENTWOOD	DISTRICT: Grand Rapids
CITY: KENTWOOD	COUNTY: KENT
CONTACT: James Oswald , Facilities Manager	ACTIVITY DATE: 12/07/2021
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance
SUBJECT: Unannounced, scheduled inspection.	SOURCE CLASS: SM OPT OUT
RESOLVED COMPLAINTS:	

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with James Oswald, Facilities Manager. We discussed the purpose of the inspection which is to determine compliance with Opt-out Permit to Install (PTI) No. 409-95B.

FACILITY DESCRIPTION

Robert Bosch Fuel Systems manufactures and remanufactures fuel injection parts for diesel fuel fired train engines and diesel fuel fired automotive engines. Opt-out PTI provides synthetic minor limits for Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) on a facility-wide basis, as well as limitations for four emission units. A copy of the emissions records are attached.

COMPLIANCE EVALUATION

Opt-out PTI No. 409-95B

EU-CALIBRATORS

This emission unit is for the central fluid distribution system for the remaining test stands in that area of the plant. The emission unit is called EU-CentralSystem in the recordkeeping and the Michigan Air Emissions Reporting System. The permit limits VOC emissions to 24.0 tons on a 12-month rolling time period. Reported 12-month rolling VOC emissions through August 2018 were 1.05 tons.

EU-DIPTANKS

This emission unit covers the small parts cleaner(s) that utilize a rust inhibitor. The permit limits VOC emissions to 13.2 tons on a 12-month rolling time period. Reported 12-month rolling VOC emissions through August 2018 were 0.021 tons.

EU-MACHININGOPS

This emission unit covers the miscellaneous machining operations throughout the facility. The permit limits VOC emissions to 20.0 tons on a 12-month rolling time period. Reported 12-month rolling VOC emissions through August 2018 were 0.121 tons.

EU-THERMALDEBURR

This emission unit covers a thermal deburring machine that has an opacity limit from the stack of 5%. The facility utilizes a consultant to take certified visible emissions observations that verify that the opacity is less than 5%.

FG-FACILITY

This flexible group covers the entire facility. The permit limits individual HAP to 9.0 tons on a 12-month rolling time period. The highest reported 12-month rolling HAP emissions through August 2018 were for glycol ether(s) at 0.03 tons.

The permit limits aggregate HAP to 22.50 tons on a 12-month rolling time period. The reported 12-month rolling aggregate HAP emissions through August 2018 were 0.04 tons.

The permit limits total VOC to 90.0 tons on a 12-month rolling time period. The reported facility-wide 12-month rolling VOC emissions through August 2018 were 3.239 tons.

Additional Exempt Equipment:

The facility operates two natural gas fired Johnston Boilers that according to the faceplates were manufactured in 1985. These boilers were relocated to the facility in 2006. The main boiler used is 250 hp or 8.37 mmBtu/hr and the second boiler which is only used as a back-up boiler is 300 hp or 10.04 mmBtu/hr.

The New Source Performance Standard Subpart (NSPS) Dc for Small Industrial-Commercial-Institutional Steam Generating Units applies to boilers that are between 10 and 100 mmBtu/hr that are constructed, modified or reconstructed after June 9, 1989. Since the boilers were operated prior to June 9, 2089, before their relocation and have not been rebuilt, reconstructed or modified since original installation, according to 40 CFR 60.14(e)(6), the relocation or change in ownership of an existing facility shall not, by itself, be considered a modification. Therefore, the 10.04 mmBtu/hr boiler is not subject to NSPS Dc. Both boilers are exempt from permitting pursuant to Rule 282(2)(b). Air emissions from the boilers are being appropriately maintained and calculated in the facility-wide totals.

CONCLUSION

Robert Bosch Fuel Systems, L.L.C was in compliance at the time of the inspection.

NAME April Lazzaro

DATE 01/10/2022

SUPERVISOR HH