

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

N214529763

<b>FACILITY:</b> NORTH AMERICA FUEL SYSTEMS REMANUFACTURING	<b>SRN / ID:</b> N2145
<b>LOCATION:</b> 4232 BROCKTON DR, KENTWOOD	<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> KENTWOOD	<b>COUNTY:</b> KENT
<b>CONTACT:</b> Ralph Severns , Environmental Manager	<b>ACTIVITY DATE:</b> 06/10/2015
<b>STAFF:</b> David Morgan	<b>COMPLIANCE STATUS:</b> Compliance
<b>SUBJECT:</b>	<b>SOURCE CLASS:</b> SM OPT OUT
<b>RESOLVED COMPLAINTS:</b>	

At 10:30 A.M. on June 10, 2015, Air Quality Division staff Dave Morgan conducted an unannounced scheduled inspection of North America Fuel Systems Remanufacturing located at 4232 Brockton Drive in Kentwood. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations as well as PTI Nos. 476-89 and 92-13. Accompanying AQD staff on the inspection was Ralph Severns, Environmental Manager. A DEQ inspection brochure was presented at the beginning of the inspection.

**FACILITY DESCRIPTION**

This facility re-manufactures diesel fuel injectors for the automotive industry. Operations at the facility consist of various metal machining operations, metal cleaning and preparation, assembly and part testing and calibration. This facility is considered a synthetic minor source for volatile organic compounds (VOC) and hazardous air pollutants (HAPs).

**COMPLIANCE EVALUATION**

The injector re-manufacturing process consists of draining out residual fuel, breaking down the injector into individual components, cleaning the components and machining them to specification, and testing and calibrating the components along the way and for final product. All machining operations are exempt under Rule 285(l). All cleaning operations are exempt under Rule 281(h), Rule 285(l)(iii), or Rule 285(r). The remainder of the equipment is exempt under Rule 290. A list of all emission units is attached. The primary air pollutant at the facility is VOC and most of that comes from the calibration and testing fluid called Viscor 1487AW. Viscor 1487AW is pumped through the components during testing and calibration to mimic diesel fuel. Fluid transfers are for the most part are done in a closed-loop system, however, all emissions are calculated on a mass balance basis. The Viscor 1487AW has a VOC content of 3.3 pounds per gallon.

The company has identified 17 emission units as exempt under Rule 290. The company is maintaining records that demonstrate that VOC emissions from all Rule 290 emission units are below 1,000 pounds per month. See attached report records.

**PTI No. 476-89**

Permit to Install No. 476-89 covers two spray tip test stands. These units are controlled by an activated carbon aerocology unit (with an assumed 90% control efficiency) and are vented to the in-plant environment. The company is maintaining records and can show that the company had 682 pounds of VOC emissions in the period from June 2014 through May 2015 which is well below the 3.4 ton limit in the permit. Solvent usage was recorded as 209 gallons from June 2014 through May 2015 which is far below the 14,333 gallon limit. Because these units have low emissions and have been replaced since the original permit was issued, these units could be operated under an exemption and the permit voided.

**FGFACILITY**

PTI No. 92-13 covers all emission units at the facility and limits HAP and VOC emissions to below the major source thresholds. According to company records for June 2014 through May 2015 the company had the following:

Parameter	Limit (12-month rolling time period)	Actual	Compliance	Comments
VOC	89.9 tons	11.0 tons	Yes	
Aggregate HAPs	22.5 tons	<11.0 tons	Yes	Company needs to refine HAPs recordkeeping. Facility HAP emissions are very low.
Individual HAP	9.0 tons	<9.0 tons	Yes	Company needs to refine HAPs recordkeeping. Facility HAP emissions are very low.
Viscor 1487AW-2	15,000 gallons	3,135 gallons	Yes	
Diesel Fuel	500 gallons	179 gallons	Yes	

Misc Solvent	4,125 gallons	665 gallons	Yes
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It is noted that although compliance could be determined with emission limits above, the company needs to improve its recordkeeping to more accurately capture emissions and usage information. Specifically, the company needs to maintain better actual monthly usage records. In addition HAP records should be more detailed to ensure that opt-out limits are met.

**SUMMARY**

The North America Fuel Systems Remanufacturing facility is in compliance with all applicable requirements. Attached to this report are various recordkeeping reports used in the compliance evaluation.

NAME 

DATE 2/9/15

SUPERVISOR PAB