

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

N214568434

FACILITY: NORTH AMERICA FUEL SYSTEMS REMANUFACTURING		SRN / ID: N2145
LOCATION: 4232 BROCKTON DR SE, KENTWOOD		DISTRICT: Grand Rapids
CITY: KENTWOOD		COUNTY: KENT
CONTACT: Scott Reinbold , TOS Supervisor		ACTIVITY DATE: 07/27/2023
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Scott Reinbold TOS Supervisor. No odors or visible emissions were noted originating from this facility.

FACILITY DESCRIPTION

North American Fuel Systems Remanufacturing remanufactures heavy duty truck diesel fuel pumps and diesel fuel injector systems. This process consists of various metal working systems, including disassembly, cleaning, tooling, testing, calibration and assembly. The facility operates pursuant to Opt-out Permit to Install No. 92-13 that includes limits on Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) emissions as well as calibration fluid use. Mr. Reinbold was able to immediately provide recordkeeping that was complete and up-to-date. After a brief visual review of the records, we agreed that he would e-mail the information. Additionally, the facility continues to maintain a listing of each piece of equipment and the applicable exemption in the master spreadsheet.

COMPLIANCE EVALUATION

The parts to be remanufactured are received and go to a teardown bench. At the teardown bench, diesel fuel that remains in the part is drained into a drip tray. The permit limits material usage of diesel fuel to 500 gallons per year, based upon a 12-month rolling time period. During the previous inspection, there was discussion as to whether or not the limit on diesel fuel was intended to apply to the teardown fuel collection. A review of the permit and application indicates that this is the intent of the diesel fuel limit, which is how the company is and has been interpreting it. The diesel fuel collected during the time frame of July 2022 through June 2023 was 194.2 gallons.

If the part is determined to be salvageable it goes through the various cleaning and/or machining processes utilized to reuse the part. All machining operations are exempt per Rule 285(2)(l). All cleaning operations are exempt under one of the following exemptions, Rule 281(2)(h), Rule 285(2)(l)(iii), or Rule 285(2)(r). All other equipment is exempt per Rule 290 and based on the recordkeeping emissions are below the exemption limit.

The calibration fluid has not changed and is the Viscor 1487AW-2, with a usage limit of 15,000 gallons per year, based upon a 12-month rolling time period. Records indicate actual usage during the time frame of July 2022-June 2023 was 6,043.0 gallons.

Solvent based cleaning solution is used and tracked as the permit limits miscellaneous solvent usage to 4,125 gallons per year based on a 12-month rolling time period. Actual reported solvent use for the time frame of July 2022-June 2023 was 95.0 gallons.

The VOC emissions are limited to 89.9 tons per year based on a 12-month rolling time period. Reported VOC emissions for the time frame of July 2022-June 2023 was 12.6 tons.

Emissions of aggregated HAPs are limited to 22.5 tons per 12-month rolling time period, and individual HAPs are limited to 9.0 tons per 12-month rolling time period. Reported aggregate HAP emissions for the time frame of July 2022-June 2023 are 0.02 tons. The highest individual reported HAP is hexane at 0.004 tons. It is noted that the emissions spreadsheet is reporting HAP emissions in pounds, which I converted to tons for this report.

EXEMPT EQUIPMENT

The emission unit records to demonstrate compliance with Rule 290 was received and reviewed. This information indicates compliance with the limits established by the rule.

SUMMARY

North America Fuel Systems Remanufacturing was in compliance at the time of the inspection.

NAME April Lazzaro

DATE 08/02/2023

SUPERVISOR 