

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

N214547548

FACILITY: NORTH AMERICA FUEL SYSTEMS REMANUFACTURING		SRN / ID: N2145
LOCATION: 4232 BROCKTON DR, KENTWOOD		DISTRICT: Grand Rapids
CITY: KENTWOOD		COUNTY: KENT
CONTACT: Jeffery Voorhies , EHS Engineer		ACTIVITY DATE: 01/09/2019
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility at 12:30 PM to conduct an unannounced, scheduled inspection and met with Jeff Voorhies, Environmental Health and Safety Engineer.

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. Voorhies 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, he maintains a listing of each piece of equipment and the applicable exemption which is attached.

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 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 January 2018-December 2018 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 January 2018-December 2018 was 5,210.8 gallons.

Very little solvent based cleaning solution is currently in use and is also being 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 January 2018-December 2018 was 169.0 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 January 2018-December 2018 was 9.85 tons.

SUMMARY

North America Fuel Systems Remanufacturing was in compliance at the time of the inspection. Recordkeeping received to demonstrate compliance is attached.

NAME

John Thompson

DATE

1-15-19

SUPERVISOR

[Signature]