SUBJECT: Target Inspection RESOLVED COMPLAINTS:

D031636633

# DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

**ACTIVITY REPORT: Scheduled Inspection** 

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	FACILITY: WESTPORT LD, INC.		SRN / ID: P0316
	LOCATION: 14900 GALLEON COURT, PLYMOUTH TWP		DISTRICT: Detroit
	CITY: PLYMOUTH TWP		COUNTY: WAYNE
	CONTACT: Lee Gibson,		ACTIVITY DATE: 03/18/2014
	STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT

DATE OF INSPECTION : March 18, 2014

TIME OF INSPECTION : 11:00 am

LEVEL OF INSPECTION : II

NAICS CODE : 541380 EPA POLLUTANT CLASS : VOC, PM

INSPECTED BY : Jill C. Zimmerman

PERSONNEL PRESENT : Lee Gibson, Supervisor, Engine Testing

FACILITY PHONE NUMBER : (734) 233-6760 FACILITY FAX NUMBER : (734) 796-2233

#### **FACILITY BACKGROUND**

Westport Innovation, Inc. is located in Plymouth, Michigan near the intersection of Beck Road and Five-Mile Road. The facility has been at this location for about two years, through the facility has only been operating for the last few months. The facility operates one shift per day, five days per week.

### COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility. A violation notice (VN) was issued when the facility failed to submit MAERS by March 15, 2014.

#### PROCESS EQUIPMENT AND CONTROLS

The facility is permitted for three fuel storage tanks, seven test cells, one chassis test cell, fabrication and space heaters. During the inspection one test cell was installed and operational, test cell 2. The remainder of the test cell units is in various stages of installation.

#### INSPECTION NARRATIVE

I arrived at the facility at 11:00 am and meet with Mr. Lee Gibson, Supervisor Test Engines. Together we walked through the facility. There was one test cell in use, test cell #2. The rest of the test units are in the process of being installed. The facility is permitted to burn gasoline, diesel, and CNG fuels. The facility uses CNG approximately 95% of the time, with gasoline and diesel making up the remainder of the fuel usage.

After the facility walkthrough, Mr. Gibson and I sat down and discussed the permit. Mr. Gibson is new to his current position, so we worked together to understand the permit. I asked whether the facility was preparing to stack test, as is required by the permit. Mr. Gibson was unaware of this requirement, so I explained the stack testing process. I also explained that a test plan would need to be submitted prior to the test.

#### APPLICABLE RULES/PERMIT CONDITIONS

The facility is currently operating under Permit To Install (PTI) 19-12, which was issued on April 4, 2012. The facility is in the process of installed the permitted equipment. Only test cell 2 is currently operational.

#### **FG-TESTCELLS:**

- ١. Emission Limits – (COMPARE WITH RECORDS)
- II. Material Limits – The facility is currently only burning CNG. Gasoline and Diesel. and is therefore in compliance with this condition.
- III. Process/Operational Restrictions - NA
- IV. Design/Equipment Parameters - Catalytic Converters were present on the test engines during the onsite inspection. Therefore the facility is operating in compliance with this condition.
- V. Testing/Sampling – The facility has not yet been operating 180 days. Therefore this condition is not applicable at this time. The facility is aware that the testing is required within the first 180 days of operation.
- VI. Monitoring/Recordkeeping - During the onsite inspection, the facility was just beginning to operate one test cell and was still in the process of installing the other cells. During an onsite meeting in June, we discussed what records were being kept onsite, and I reviewed the current records.
- VII. Reporting – The facility has not yet completed installation of the permitted equipment, therefore this condition is not applicable at this time.
- VIII. Stack/Vent Restriction – All stacks have been installed to the required speculations. Therefore the facility is operating in compliance with this condition.
- IX. Other Requirements – NA

## **FG-FACILITY**

- 1. Emission Limits – At the time of the onsite inspection, the facility had not operated long enough to have a 365 day rolling emission average. This condition will be evaluated during future inspections.
- 11. Material Limits - NA
- Process/Operational Restrictions - NA
- IV. Design/Equipment Parameters - NA
- V. Testing/Sampling - NA
- VI. Monitoring/Recordkeeping – During the onsite inspection, the facility was just beginning to operate one test cell and was still in the process of installing the other cells. During an onsite meeting in June, we discussed what records were being kept onsite, and I reviewed the current records. Reporting – NA
- Stack/Vent Restriction NA VII.
- VIII. Other Requirements – NA

## MAERS REPORT REVIEW

As of April 22, 2014 MAERS has not been submitted for FY2013. MAERS was due on March 17, 2014. On April 4, 2014 a letter was sent to the facility inquiring about the MAERS. A violation notice was sent to the facility for non-submittal of MAERS. MAERS was submitted on June 26, 2014. A more in-depth review will be completed based on what is submitted for FY2014 as more of the test cells should be operating.

#### FINAL COMPLIANCE DETERMINATION

Westport Innovations, Inc. appears to be operating in compliance with all state and federal regulations, as well as all permit conditions.

NAME JORGANIZATION DATE 8/27/14 SUPERVISOR W.M.