# DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

**ACTIVITY REPORT: Scheduled Inspection** 

FACILITY: Ricardo Inc.		SRN / ID: N6962
LOCATION: 40000 Ricardo Drive, VAN BUREN TWP		DISTRICT: Detroit
CITY: VAN BUREN TWP		COUNTY: WAYNE
CONTACT: Theodore Byrne, Quality Liason		ACTIVITY DATE: 06/19/2014
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION

: 06/19/2014

TIME OF INSPECTION

: 11:00 am

: 11

LEVEL OF INSPECTION

: 541330

NAICS CODE EPA POLLUTANT CLASS

: VOC, CO, NOx

INSPECTED BY

Nicocopezco

: Jill Zimmerman

PERSONNEL PRESENT

: Ted Byrne, Quality Environmental H&S Manager

Craig Assenmacher, Engineering Manager, Powertrain Development

FACILITY PHONE NUMBER

: 734-394-3712

FACILITY FAX NUMBER

: 734-397-6677

## **FACILITY BACKGROUND**

Ricardo operates eleven engine test cells. These engines operate on gasoline, diesel or compressed natural gas. The facility operates two shifts per day, five days per week based on a need from the customers.

#### COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility. No VNs have been issued to this facility since at least the last inspection.

## **OUTSTANDING VNs**

No VNs have been issued since at least the last time that this facility was inspected.

## PROCESS EQUIPMENT AND CONTROLS

Each engine is equipped with a catalytic convertor to control emissions. Each test cell operates one of the engines to be tested on a dynamometer. The test is controlled in the control room by the technician based on the test protocol.

#### INSPECTION NARRATIVE

I arrived at the facility and met with Mr. Byrne and Mr. Assenmacher. Together, we walked through the test cell area. No new cells have been added. The most significant process change since the last inspection dealt with fuel usage. The facility applied and received a Permit To Install for the use of compressed natural gas (CNG) as an alternative fuel. This permit was approved on March 5, 2013. The facility is required to perform a stack test within 180 days of start-up operation with CNG. As of the inspection date, no test cells have operated with CNG. The facility preformed a stack test for diesel and gasoline fueled engines on August 19 and 20, 2014. The facility plans to test a CNG fueled engine in the future when a job using a CNG engine is requested at Ricardo.

Fuel usage records are kept and weekly entered into a company computer program. These records, which are required as part of the ROP and PTI, are then used to calculate MAERS.

At least one cold cleaner was seen during the onsite inspection. This cold cleaner was not being used and was closed.

# APPLICABLE RULES/PERMIT CONDITIONS

The eleven test cells are operating under MI-ROP-N6962-2010

EU-ROLLCELL -- NA this equipment was never installed.

# FG-TESTCELLS

I. Emission Limit(s)

- 1. NOx Compliance during 2013 the facility emitted less than 3.5 tons.
- 2. CO Compliance during 2013 the facility emitted less than 8 tons.
- 3. PM10 Compliance during 2013 the facility emitted less than 1 ton.
- 4. SO2 Compliance during 2013 the facility emitted less than 1 ton.
- 5. VOC Compliance during 2013 the facility emitted less than 2 tons.
- II. Material Limit(s)
  - 1. Compliance Less than 2,000 gallons of diesel were used during 2013.
  - 2. Compliance Less than 25,000 gallons of spark-ignited fuel was used during 2013.
- III. Process/Operational Restriction(s) Compliance the test cell operated in compliance with Title II, Part A, Section 202 of the Clean Air Act.
- IV. Design/Equipment Parameter(s) NA
- V. Testing/Sampling Compliance a stack test preformed on August 19, 2014 and August 20, 2014.
- VI. Monitoring/Recordkeeping
  - 1. Compliance all records were up to date during the onsite inspection
  - 2. Compliance all records were available for review during the onsite inspection and appear to have been maintained accurately.
- VII. Reporting
  - 1. Compliance no deviations have been reported since the last onsite inspection.
  - 2. Compliance -- The semiannual report for the reporting period of July 1, 2013 December 31, 2013 was received on March 14, 2014. The semiannual report for the reporting period of January 1, 2013 June 30, 2013 was received on September 12, 2013.
  - 3. Compliance -- The annual report for the reporting period of January 1, 2013 December 31, 2013 was received on March 14, 2014.
  - 4. Compliance No new construction, installation, reconstruction, relocation or modification has occurred since the last onsite inspection.
- VIII. Stack/Vent Restriction(s) Compliance no changes have been made to the stacks since they were installed.
- IX. Other Requirement(s) Compliance no changes in land usage has occurred since the last onsite inspection.

# **FGCOLDCLEANERS**

- Emission Limit(s) NA
- II. Material Limit(s) Only acceptable chemicals are used in the coldcleaners.
- III. Process/Operational Restriction(s) Unknown I did not observe any parts being cleaned during the onsite inspection.
- IV. Design/Equipment Parameter(s)
  - 1. Compliance The cold cleaner is used to clean metal parts and releases all emissions to the general plant air.
  - 2. NA The cold cleaner was closed and not being used during the onsite inspection.
  - 3. Compliance The cold cleaner was closed during the onsite inspection.
  - 4. Compliance The cold cleaner was closed during the onsite inspection.
  - 5. Compliance The cold cleaner is not heated and operates at room temperature.
- V. Testing/Sampling NA
- VI. Monitoring/Recordkeeping
  - 1. NA The cold cleaner is not heated.
  - 2. Compliance Proper records are maintained regarding the cold cleaners.
  - 3. Compliance Written operating procedures are maintained at the facility.
  - 4. NA
- VII. Recordkeeping
  - 1. Compliance no deviations have been reported since the last onsite inspection.
  - 2. Compliance -- The semiannual report for the reporting period of July 1, 2013 December 31, 2013 was received on March 14, 2014. The semiannual report for the reporting period of January 1, 2013 June 30, 2013 was received on September 12, 2013.
  - 3. Compliance -- The annual report for the reporting period of January 1, 2013 December 31, 2013 was received on March 14, 2014.
- VIII. Stack/Vent Restriction(s) NA
- IX. Other Requirement(s) NA

# MAERS REPORT REVIEW

MAERS was received on March 11, 2014 and was reviewed by me on March 31, 2014. No errors were found and all of the emissions appear to have been reported accurately.

# FINAL COMPLIANCE DETERMINATION

Ricardo appears to be operating in compliance with all state and federal requirements, as well as all ROP and PTI conditions. MAERS was submitted on time and appears to have been reported accurately.

NAME SOCCE

DATE 9/8/14

SUPERVISOR

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