

INSPECTION REPORT

Attached please find the United States Environmental Protection Agency's (EPA's) inspection report of your inspected facility and/or any vehicles/engines identified therein. EPA is providing this report as a matter of agency policy and will contact you again only if needed.

Without making a determination that your business or organization is a small business, EPA is also providing you with a link to this Small Business Resources Information Sheet (<https://www.epa.gov/compliance/small-business-resources-information-sheet>) which provides an array of resources to help small businesses understand and comply with federal and state environmental laws.

Inspection Information	
Inspection Number:	R8_CAA_20250127_LECORTZ_01_DDD
Inspection Date(s):	January 27, 2025
Regulatory Program(s):	40 C.F.R. Parts 85, 86, and 1068
EPA Region/Program Conducting Inspection:	EPA Region 8, Enforcement and Compliance Assurance Division, Air and Toxics Enforcement Branch
Company Name:	Dooley's Diabolical Diesel
Facility Name:	Dooley's Diabolical Diesel
Facility Physical Location: (street address, building/unit #)	2012 13 th St S
(city, state, zip code)	Great Falls, MT 59405

Inspection Report Revision History		
Revision #	Revision Date	Reason for Revision

Inspector and Approval

Colin LeCortz

Field Inspector Name

Signature

1/28/2024

Date

Scott PatefieldName of Approving
OfficialManager

Title

SCOTT PATEFIELD

Signature

Digitally signed by SCOTT PATEFIELD
Date: 2025.02.05 15:10:52 -07'00'

Date

FACILITY INSPECTION WORKSHEET

(Supplemental notes or narrative format may be used as preferred).

General Inspection Information			
Facility Name:	Dooley's Diabolical Diesel	Inspection Date	1/27/2025
Facility Address:	2012 13 th St S, Great Falls, MT 59405	Arrival/Departure Time	2:40 PM 4:05 PM
		Inspection Number/ID:	R8_CAA_20250127_LECORTZ_01_DDD
Primary Facility Representative & Title:	Casey Dooley, owner	Inspector(s):	Colin LeCortz (EPA) Bob Gallagher (EPA)
Facility Contact Phone/Email:	Casey Dooley dooleysdiesel@gmail.com		
Time Inspector Presented Credentials:	3:12 PM	Compliance Assistance Reference Materials Provided to Facility	☐ SBREFA Form ☐ Exhaust Repair Guidelines ☐ Memo 1A ☒ Tampering Brochure ☐ Engine Switch Fact Sheet ☒ Other: Anti-Tampering Fact Sheet & Regulation
Permission to Enter Facility Granted? If Yes, by whom? If No, explain.	☒ Yes ☐ No		
	Yes, Casey Dooley		
Photographer Name:	Colin LeCortz	Photograph Range:	IMG_0091 through IMG_0103
Notes (e.g. compliance actions taken by facility, purchased samples, other relevant background, etc.):	Dooley's Diabolical Diesel (DDD) is a general repair service shop for primarily diesel vehicles. The owner provided both verbal and electronic service record descriptions, upon request. These records were provided onsite, although the date of the work orders were not clear when the vehicles work commenced- discussed more below. DDD works on approximately 10 vehicles per week, and primarily works on the engine (heads), transmissions and injectors, as well as front end work according to facility employee and owner. According to DDD, tuning occurs at DDD, and the facility uses an AE Tools laptop for scanning vehicles, uploading tunes such as to adjust gas volumes if larger fuel tanks are installed or flashing ECM's back to stock/OEM specifications. Additionally, DDD verbally discussed with EPA inspectors that tampering does not occur at the facility. EPA inspected the exhaust and engine components of vehicles at DDD, and noted vehicles that required additional follow-up or showed potential signs of emissions tampering (post combustion controls removed). DDD provided work orders and documentation upon request for vehicles that were noted as having emissions control removed during the onsite walkthrough, and work orders did not specifically discuss tampering or the removal of emission controls. At the end of the Facility walkthrough, EPA inspectors observed a Chrysler emission controls (post combustion) on the side of the building on the outside (see photo log below), discussed below in the Areas of Concern. The part number on the emissions control may be associated with a Ram 1500 catalytic converter/oxidation catalyst. EPA inspectors did not see a Ram 1500 on the lot. DDD told EPA employees that sometimes other shops may illegally drop off trash in that location. Areas of Concern: The EPA reviewed work orders for vehicles noted in the Vehicles Inspected/ Observed table below that were observed having potential tampering of original equipment emission components. Generally, the work orders contained enough information to determine that tampering did not occur at the Facility. However, in Documents Requested, EPA inspectors reviewed two work orders for a vehicle in the service bay and vehicle in the lot that was dated (Schedule/ Promise Date) 6 months earlier than the date of inspection, and could not be determined if the work order was timely. The Repair Order # on 3 of the 4 service records were numbered as "000000." Therefore, it is unclear if DDD is filling out service records appropriately for EPA inspectors to be able to determine work conducted and timeliness of the work orders. Although the work order service date was unclear, the vehicle engine in the service bay was being torn down and EPA inspectors did not note additional areas of concern such as tampered emissions components in the shop. The other vehicles in the lot were there for front end work according to DDD (turbo's, CV axle service, cylinder heads, air intake). EPA suggests the facility maintain clear records for ease of use by mechanics. Multiple vehicles on the DDD lot had components at the time of inspection that defeated emission components from the manufacturer. See Photo Log and Vehicles Inspected/Observed below. However, according to DDD the tampering did not occur at the facility. One of the work orders included "Relearn Procedure." While this feature for tuning can be used for manufacture specified transmission service, this feature may also be used after other tuning that could be used to defeat emission controls- EPA is noting this for informational purposes at this time.		

	Compliance Assistance: The EPA would recommend that DDD maintain an intake form, checklist or more informative work orders for all vehicles to note which have emission control components removed prior to working on vehicles, among other inclusions such as vehicle condition and general notes. The EPA will continue to work with the Facility, conduct unannounced follow-up inspections, and provide resources where requested to ensure compliance with federal regulations. DDD discussed the interest in building race vehicles, as well as requesting regulatory clarity of federal rules. EPA inspectors attached the EPA Tampering Policy: The EPA Enforcement Policy on Vehicle and Engine Tampering and Aftermarket Defeat Devices under the Clean Air Act Memo which includes plain language regulatory summaries with the transmittal of this inspection report. EPA inspectors are offering to further discuss federal regulations with DDD upon request.
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Facility Business Activities

Types of Services (check all that apply)		Description/Observations (types and brands of parts that are manufactured or sold, types of shop services provided, etc.)	Estimated Throughput (e.g., sales per month, installs per week)
☐	Manufactures aftermarket parts (hardware or software)		
☐	Sells aftermarket part sales (including drop shipments)		
☒	Service shop	EPA Inspector LeCortz and the facility owner walked the facility shop and grounds noting emission control equipment that had been removed from certain vehicles. The owner supplied verbal and electronic information that this was not a product of vehicle tampering at the facility.	Approximately 10 vehicles repaired or serviced in total per week.
☐	Fleet		
☐	Other:		

Personnel Interviewed

Name	Title/Position	Contact Info. (e.g., email, phone number)	Interviewed by (Last name of Inspector)
Casey Dooley	Owner	dooleysdiesel@gmail.com	LeCortz
Tracer Nitz	Employee	NA	LeCortz

Documents Requested		
Document(s)	Status	Notes/Comments
Onsite review of records	☒ Document(s) Provided ☐ Document(s) Denied ☐ Will Provide After Inspection ☐ Other (see notes)	DDD was able to provide access to the facility and all service records upon request. However, two of the work orders provided for the vehicle located in the service bay was dated 6 months earlier (schedule/promise date) than the date of inspection, and could not be determined if the work order was timely. Additionally, Repair Order # for 3 of the 4 work orders requested by EPA are numbered "000000." See areas of concern above.
	☐ Document(s) Provided ☐ Document(s) Denied ☐ Will Provide After Inspection ☐ Other (see notes)	
	☐ Document(s) Provided ☐ Document(s) Denied ☐ Will Provide After Inspection ☐ Other (see notes)	
	☐ Document(s) Provided ☐ Document(s) Denied ☐ Will Provide After Inspection ☐ Other (see notes)	

Vehicles Inspected/Observed				
License Plate (State + last three digits) or Vehicle Make and Model	EPA Engine Family	Appearance of Tampering (Yes/No/TBD)	OBD Data Obtained? (Yes/No)	Observations (e.g., Who Performed Apparent Tampering?) ¹
MT: PUL. Ram 3500 (outside)	NA	Yes	No	Emissions Delete (post-combustion control), straight pipe, potential O2 sensor wiring was observed to be unplugged
MT: DJM. GMC Sierra HD	NA	Yes	No	Emissions Delete (post-combustion control), straight pipe, potential O2 sensor wiring was observed to be unplugged
MT: 2-20. Chevrolet Silverado	NA	Yes	No	Emissions Delete (post-combustion control), straight pipe, potential O2 sensor wiring was observed to be unplugged
GMC Sierra and Chevrolet 3500 LTZ/Z71	NA	Yes	No	Emissions Delete (post-combustion control), straight pipe, potential O2 sensor wiring was observed to be unplugged

¹ DDD provided substantial information to determine that emissions tampering observed did not occur at the facility at the time of inspection.

APPENDIX A: Photo Log

File Name (jpg)	Description	Photographer
IMG_0091	AE Tools laptop that is used for tuning.	C. LeCortz
IMG_0092	Vehicle, Ram 3500 being worked on in bay. DDD discussed that an EGR failed on this vehicle. Inspectors did not see the EGR in the service bay.	C. LeCortz
IMG_0093	Work order for vehicle in bay.	C. LeCortz
IMG_0094	Owner provided information regarding parts used.	C. LeCortz
IMG_0095	Ram 3500 (outside) that has a straight pipe, deleted.	C. LeCortz
IMG_0096	Ram 3500 (outside) that has a straight pipe, deleted.	C. LeCortz
IMG_0097	GMC Sierra HD that has a straight pipe, deleted	C. LeCortz
IMG_0098	GMC Sierra HD that has a straight pipe, deleted	C. LeCortz
IMG_0099	Chevrolet Silverado that has a straight pipe, deleted.	C. LeCortz
IMG_0100	Chevrolet Silverado that has a straight pipe, deleted.	C. LeCortz
IMG_0101	GMC Sierra and Chevrolet that each have straight pipe, deleted	C. LeCortz
IMG_0102	Chrysler post combustion emission controls. Removed from vehicle and located on the side of the service shop.	C. LeCortz
IMG_0103	Chrysler post combustion emission controls. Removed from vehicle and located on the side of the service shop.	C. LeCortz