



**Roush Industries, Inc.**

Facilities Department

Vincent M. Anderson

EHSS Manager

October 31, 2023

Mr. Sam Liveson,

We received the Violation Notice dated October 13, 2023 indicating “Test cell 15 in building 1 has two exhaust stacks, but the test cell is only [*sic*] permitted to have one exhaust stack.”

We became aware of this discrepancy in August 2023. Although we have been unable to determine the exact reason for the error, it appears to have been carried through the permit process from July 2021.

We had internal discussions about the feasibility of physically modifying the stack arrangement to match the permit and have decided that it would be best to alter the permit. We have spoken with Mark Mitchell with EGLE AQD. He stated that doing so would require a new PTI application, including RACT and TAC analyses, and modeling. We have initiated that process and plan to have the application submitted by the end of Q4 2023.

The stacks do not alter the type or amount of emissions generated from that test cell. The cell is only capable of having one engine run at any time. The stacks do not alter the capacity for fuel throughput. The separate exhaust lines simply allow for the re-creation of certain real-world mobile source situations, where each exhaust manifold has its own exhaust piping. Regardless, we will make the necessary application to modify the permit.

Please feel free to contact me if you have any questions prior to our PTI re-submission.

Vince Anderson

EHSS Manager

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