



July 31, 2017

David L. Morgan
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Response to Violation Notice Regarding Permit to Install No. 230-15A

Special Condition V.1 – Verification of carbon monoxide emission rates from engine test cell exhaust stacks within 180 days of initial startup. Kawasaki started use of engine test cells on January 12th 2017 and to date has not verified test cell exhaust stack CO emissions. This was due to Kawasaki personnel not being aware that this verification was required. Actions put in place to correct this situation include Kawasaki partnering with BTEC Inc. and GZA GeoEnvironmental, Inc. to complete the testing necessary to verify the CO emissions from the engine test cell exhaust stacks. A test plan has been constructed with a proposed test date of 9/19/2017 and sent to the AQD for approval. Upon approval of the test plan, BTEC Inc. and Kawasaki will work together with the AQD to obtain engine test cell stack CO emissions to ensure testing operations are within the specifications of the permit.

Special Condition VII.1 notify the AQD within 30 days of completed test cell installations. This notice was required 30 days past January 12th 2017 and was provided on June 22nd when Dave Morgan visited Kawasaki Motors Corp. and conducted an inspection of the new testing facility. This was due to Kawasaki personnel not being aware that this notification was required. In order to prevent this situation from recurring in the event that Kawasaki adds emissions producing exhaust stacks in the future, notification to the AQD within 30 days of completion will be added to scope of project work.

Thank you for bringing these issues to our attention and we look forward to working with you in the future to resolve the issues at hand while also maintaining compliance for future operations.

Sincerely,

Zach Denault
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