



August 21st, 2023

Dear April Lazzaro,

Kawasaki Motors Corp., U.S.A. is submitting this correspondence in response to the Violation Notice dated July 31st, 2023 regarding the failure to maintain 12-month rolling total emissions records and the failure to maintain continuous temperature records of the PCO.

- The violation regarding the failure to maintain 12-month rolling total emissions records first occurred on 1/1/2019. The yearly spreadsheet used by our facility contained an error within a formula that caused incorrect 12-month rolling total emissions calculations. This formulas within the spreadsheet were corrected and reviewed by several team members on 8/16/2023. Therefore, the duration of this violation was 1,688 days. A copy of this information was shared with EGLE on 8/17/2023. These corrected formulas were retroactively applied to our previous spreadsheets to ensure a minimum of 5 years of records are maintained. A semi-annual review of this spreadsheet will ensure its accuracy and prevent a reoccurrence of this violation.
- The violation regarding the failure to maintain continuous temperature records of the PCO first occurred on 6/2/2022, when PTI 67-22 was issued for our PCO. Kawasaki misinterpreted the applicable requirements and had only recorded daily PCO temperatures, rather than continuously recording the temperature every 15 minutes. Kawasaki revised the PCO monitoring system to incorporate continuous temperature monitoring every 15 minutes on 7/13/2023. Therefore, the duration of this violation was 406 days. Kawasaki will monitor this information daily to ensure it is being correctly recorded and prevent a reoccurrence of this violation.

Kawasaki trusts that the information included in this response to the violations described above is sufficient to resolve this matter. If you require any additional information, please do not hesitate to contact me at (616) 954-3016 or paul.marvin@kmc-usa.com

Best regards,

Paul Marvin
Regulatory Compliance Engineer

Kawasaki Motors Corp., U.S.A.
5080 36th Street SE, Grand Rapids, Michigan 49512
Ph. 616.949.6500 Fax 616.954.3031