

PTI 128-23

Dear Nathanel Gentle and Jenine Camilleri – On July 3,2024 we received the violation letter for the failed emissions test for NOx. Three violations were noted, and the response below will show you how two will be corrected and why the test was not completed within the required time frame.

- 1. EUENGINE1 has a NOx emission limit of 2.0 g/HP-hr. Sample results provided demonstrated an average emission rate of 2.40 g/HP-hr.
 - a. Caterpillar was contacted and they advised that they could tune the machine which would bring the emissions test within the approved limits. They will be arriving on August 26th to perform the maintenance and then Network Environmental will arrive on August 27th to perform the emissions test again.
- 2. EUENGINE1 was not operated within 10 percent of 100 percent peak load during the duration of test runs.
 - a. Our maintenance team fired up the generator and did not check peak load before network environmental took the first sample. The second and third sample was taken within the peak load limits. We will also have Caterpillar on site for the day of the emissions test and all tests will be taken within the 10 percent requirements.
- 3. Testing to verify the NOx, CO, and VOC emission rates was not completed within 180 days of permit issuance.
 - a. Testing was set up for a date within 180 days until we were told that a 12-14foot stack would need to be installed before emission test could be completed.
 Parts for the stack to be installed were delayed in production and therefore we
 were late for our emissions test.