

Powertrain Integration

Erik A. Gurshaw
Environmental Quality Analyst
Air Quality Division
Re: Response to Violation Notice, 11/6/13

11/27/13



Dear Mr. Gurshaw,

As stated in the violation letter dated November 6th 2013, Powertrain Integration was inspected in January of 2013 for violations to the Clean Air Act. Powertrain Integration is a small company who was unaware that we were in violation of any rules, because we were developing products which are legal for on road use. We have since filed for a synthetic minor permit, which we have been informed has been issued but we have not received a hard copy of it yet. This permit keeps Powertrain Integration from applying for a renewable operating permit, by instead having limits on fuel consumption.

The nature of this violation of the "potential" for Powertrain Integration to emit is based on Carbon Monoxide emissions, specifically when operating with Gasoline. With un-controlled emission factors, we would have to burn over 50,000 gallons of gasoline in a one year period to have actually exceeded the 100TPY. In the time since Powertrain Integration first started operating a dynamometer cell in 2010, we have burned less 1000 gallons of gasoline total. The dynamometer cells themselves are capable of operating gasoline engines with the "potential" of emitting over 100TPY of CO. However, our facilities gasoline fueling infrastructure (a 250 gallon tank) is not capable of practically supporting the 50,000 gallons of fuel needed to exceed limits.

While we were unaware of being in violation of this rule, the potential for us to emit over 100TPY of CO would have been near impossible. We are also 100% positive that we did not burn enough fuel to have actually been a major source. We also now have fuel control limits to keep us from being a major source.

Respectfully,

Brad Shantry

Operations Manager