

ANDRONACO INDUSTRIES

4855 Broadmoor Ave SE, Kentwood, MI 49512

June 12, 2023

State of Michigan
Department of Environment, Great Lakes and Energy
Grand Rapids District Office
350 Ottawa Avenue, NW, Unit 10
Grand Rapids, MI 49503-2341
Attn: April Lazzaro, Senior Environmental Quality Analyst



Ref: SRN: P0361 Kent County

Dear Ms. Lazzaro:

This letter is sent in response to your visit of April 6, 2023 to Andronaco plants 1 & 3. On the day of your visit, I had been an employee of Andronaco for 2 days and had no previous knowledge or experience with their environmental program or permits. Similarly, the current owners of the Plants are new too. There has been considerable turnover in both leadership and employees because of the sale of the business and some of the historical information is hard to track. While your former contact, Kevin DeGraves is still at Andronaco, he is the Quality Manager, and with my hiring, is devoting his time to quality responsibilities.

Due to my short time working with Andronaco, I am opting to hire a consultant to examine:

- 1.) The permit requirements vs. the recordkeeping
- 2.) The exceedance of Styrene content limit
- 3.) The failure to calculate emissions of VOC and acetone
- 4.) Conduct a facility wide inventory of equipment and identify the permitted or exempt status of the each
- 5.) How the ovens are being used at each of the plants and whether they need to be permitted

The decision to hire a consultant is to make sure these important environmental activities are carried out within the parameters of the Permits and/or if deviations are found that we address the process to get Andronaco back in compliance with the Clean Air Act.

I'm going to first reach out to Advanced Environmental Services for assistance since they have history with this organization and will keep you informed of our progress or path forward. That call was made today, Monday, June 12, 2023. Please let me know if there is anything else we can do in the short term to satisfy this request.

Sincerely,

A handwritten signature in blue ink that reads "Colleen Bowden".

Colleen Bowden
Environmental, Health and Safety Manager