PHARMACANN

April 25, 2022

VIA EMAIL, USPS, AND FEDEX

SRN: P1109, Macomb County

Lindsey Wells
EGLE, AQD, Warren District
27700 Donald Court
Warren, MI 48092

Dear Ms. Wells,

This letter is in response to the Violation Notice dated April 5, 2022, citing a violation of PTI 10-20A, Special Condition V.2, along with requests for correction pertaining to the test data for the emissions test conducted November 16-18, 2021 for the property located at 21590 Hoover Road, Warren, Michigan.

Violation of PTI 10-20A, Special Condition V.2

The cited violation of PTI 10-20A, Special Condition V.2 was addressed in PharmaCann's response on April 14, 2022 to the Violation Notice dated March 28, 2022. As stated in that written response, the cause of this violation was due to an inadvertent miscommunication internally, where the report from Air Hygiene was not forwarded to the correct individual tasked with sending to EGLE. This violation is no longer occurring, as the report was received by the AQD Technical Programs Unit and the District Office on March 21, 2022. As described below, a new internal structure has been put in place that will prevent further issues.

On February 28, 2022, PharmaCann Inc. completed a definitive merger agreement to acquire LivWell Holdings, Inc., the parent company of the tenant and operator of the property referenced above. As part of this acquisition, PharmaCann's Compliance Department is now responsible for all matters involving regulatory agencies, including the Michigan Department of Environment, Great Lakes, and Energy (EGLE). PharmaCann's Compliance Department consists of a team of compliance professionals who work to ensure compliance with all laws, regulations, and guidelines. Moreover, this team provides timely submissions to regulatory agencies and carefully manages deadlines.

Moving forward, please use Meagan Goddard, Regulatory Compliance Associate, as your primary point of contact for all correspondence. Ms. Goddard can be reached via email at meagan.goddard@pharmacann.com or by phone at 504-701-5860. All correspondence sent to Ms. Goddard will be shared with the broader PharmaCann Compliance Department to effectively manage deadlines and submissions. By using this structure, a reoccurrence of the cited violation will be prevented.

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Correction of Emissions Test Report

Please see the below information for corrections pertaining to the test data for the emissions test conducted November 16-18, 2021:

Approval Condition	Comments
Incorrect ammonia (NH3) emissions reported	Raw emissions data that are non-detect are to be reported at the detection limit of the analytical finish. The method of determining the detection limit will be reported. **Response:** Method of determining the detection limit is provided in the updated report dated April 22, 2022 sent to the AQD on April 26, 2022.
Natural gas BTU value	Process operating parameter data not included in test report. **Response:** This data is provided in Appendix B of the updated report dated April 22, 2022 sent to the AQD on April 26, 2022.
Natural gas fuel usage	Process operating parameter data not included in test report. **Response:** Consistent with the permit, the property has a total meter and data is available as total fuel usage.
Ventilation flow rates through ERV1 and ERV2	Process operating parameter data and/or detailed equipment design specifications not included in test report. **Response:** This data is provided in Appendix B of the updated report dated April 22, 2022 sent to the AQD on April 26, 2022.
Method 320 documentation of manually analyzed difference spectrum	This condition is a quality assurance requirement of the USEPA Method 320. The AQD provided additional, written instructions to the responsible official on November 22, 2021. **Response:** This information will be provided in an updated report that will be sent to the AQD no later than May 6, 2022.
Method 320 raw interferograms must be recorded and stored at approximately one-minute intervals	The test report states that the data was collected at approximately 30 second data points. This deviation was not approved by the AQD and is lacking insufficient analytical justification. **Response:** This data has been provided in the updated report dated April 22, 2022 sent to the AQD on April 26, 2022.
Method 320 Manufacturer's Quantitation Recipe	During the test event, the AQD observed that the quantitation routine used for the test event was analytically inaccurate and not in accordance with the test plan approval. Additional written instructions were provided to the responsible official on November 22, 2021. The report is lacking insufficient detail to determine that the specified quantitation routine was utilized.

	Response: This information will be provided in an updated report that will be sent to the AQD no later than May 6, 2022.
Method 320 analyte spike tabulated data recorded continuously from steady state native to post spike	The complete, raw, tabulated Method 320 data file, in the original exported format (text tab delimited) for the entirety of the test event, including all quality assurance checks will be provided. **Response:** This information has been provided to the AQD on April 26, 2022 in the zip file titled PRN Files.
Method 320 gas cell temperature and pressure will be recorded at all times	Cell temperature and pressure not included in tabulated run data. Incomplete gases reported in quality assurance tabulated data. **Response:** This information has been provided to the AQD on April 26, 2022 in the zip file titled PRN Files.
Method 320 documentation of pre-test analyzer diagnostics	The diagnostics data are illegible. **Response:** Annotated photos provided in the updated report dated April 22, 2022 sent to the AQD on April 26, 2022.

Kind regards,

Seth Knocke

Seth Knocke
Director, Global Compliance, PharmaCann Inc.
seth.knocke@pharmacann.com

CC: Ms. Jenine Camilleri
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