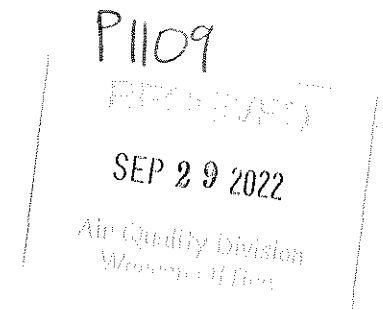


September 21, 2022

Robert Elmouchi
Environmental Quality Analyst
EGLE - Michigan Department of Environment, Great Lakes and Energy
Air Quality Division
27700 Donald Court
Warren, MI 48092-2793



Reference: Hoover Road Real Estate LLC (LivWell Michigan)
Permit 10-20A P1109
Notices of Violation dated December 20, 2021, and September 7, 2022

Dear Mr. Elmouchi,

We are in receipt of the two above referenced Violation Notices and are writing to respond with the planned program of compliance.

On August 3, 2022 a completed PTI application and an amendment of the existing Permit (“Application”) was resubmitted (original submittal date February 7, 2022) to address the natural gas fired boiler violations referenced in the Violation Notice sent on December 20, 2021 and September 7, 2022. The Application includes the addition of one dual fuel boiler and amends the existing permit from three boilers to four 6MMBTU boilers, which will be permanently installed as emergency boilers in lieu of heat from the CoGen units. The facility utilizes the hot water primarily for dehumidification, and to a lesser degree to maintain temperature during cold periods.

During the pandemic there were significant supply chain problems including our ability to obtain the initial 3 dual-fuel boilers previously approved. The temporary boiler identified in the December Violation Notice was installed as a stopgap preventive measure to protect the facility from a loss of heat and dehumidification as we were unable to obtain the planned boilers. The implementation was very timely as shortly afterwards the CoGen units encountered a sporadic outage lasting just under 24 hours. During this period the temporary boiler was able to sustain both temperature and required Relative Humidity.

Throughout 2021 there were 8 instances of low heat production (typically during a maintenance event). These occurrences totaled just under 60 hours. There has been no activity subsequent to the inspection date. The temporary boiler was removed from the facility in late June 2022 and replaced with the fixed, dual-fuel boilers identified in the September Violation Notice. Prior to the delivery of the dual fuel boilers it was determined that a higher level of heat would be beneficial and the fourth boiler was added to the order for delivery. These boilers have not been used aside from their initial testing when the equipment was commissioned. The temporary boiler (referred to as EU Boiler Temp) was listed in the MAERS reporting for 2021 which showed that we stayed within our proscribed NOx limits.

The planned Permit Addendum (informally approved) includes the fourth 6 MMBtu Fixed Boilers and will insert enforceable limits to preclude concurrent operation to ensure that the NOx limits are not exceeded.

As to the ethanol-based extraction process, the process has been operated at a minimal level as both products and processes are developed. Anticipated use of ethanol will not exceed the limit in the Addendum for this constituent, and we will ensure that VOC total regulation requirements are not exceeded. A request was made to add 2 pieces of equipment, a RotoVap and short path distiller to the PTI. Their use will not increase ethanol emissions from the facility as the emissions are accounted for when ethanol is already accounted for in the tracking process. Additional containment methodologies such as additional Activated Carbon filters and hourly operational limitations may need to be considered in the future if the expected totals approach overall limits (which we do not expect).

In summary, the extraction equipment identified in the December 2021 Violation Notice and the fourth 6MMBtu boiler identified in the September 2022 Violation Notice have been added to the pending PTI application. Additionally, the temporary boiler identified in the December 2021 Violation Notice has been removed from the facility.

Submitted for your consideration and understanding.

Sincerely,

A handwritten signature in black ink, appearing to read "Evan DuPree". The signature is stylized with a large initial "E" and a cursive "DuPree".

Evan DuPree
Senior Manager of Operational Compliance

Cc: Ms. Jenine Camilleri
Enforcement Unit Supervisor
P.O. Box 30260
Lansing, MI 48909-7760