



Your Second Line of Defense™

June 15, 2023

Michigan Department of Environment, Great Lakes and Energy
Air Quality Division Detroit District
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202
ATTN: Sam Liveson

Re: Alco Products, LLC; 580 Old St Jean Street, Detroit, MI; VN May 18, 2023

Dear Mr. Liveson,

This letter is in response to the Violation Notice issued to Alco Products, LLC ("Alco") dated May 18, 2023. In your letter, you allege that Alco was not exempt from obtaining an air quality Permit to Install ("PTI") pursuant to Rule 290 and that Alco failed to maintain emission calculations required under Rule 290 in any event.

Alco has in good faith been operating pursuant to a Rule 290 exemption from air permitting since 2009, as acknowledged by EGLE in a letter dated November 2, 2009, from Mr. Lee H. Varner, Senior Environmental Engineer, AQD to Alco. See Attached Letter. At no time since that date has EGLE indicated, until now, that the exemption no longer applied. Alco does not believe escalated enforcement is justified or that Alco should be penalized for relying on EGLE's prior documented determination in this regard. In addition, Alco disagrees that it failed to maintain the emission calculations as required by Rule 290 and has provided such records to you on a couple occasions. Most recently, after reviewing monthly VOC emission data provided to EGLE, it is our understanding that you no longer need the information requested in the VN and that additional information can be submitted with Alco's PTI application.

Alco understands from subsequent discussions with EGLE that it must apply for a PTI. Alco has requested a proposal from its consultant, Apex, to prepare the requested facility-wide Potential to Emit (PTE) demonstration and PTI application. We hope to have this soon and will proceed as expeditiously as possible.

If you have any questions regarding our response, please do not hesitate to contact me at 313-823-7500.

Very truly yours,

A handwritten signature in blue ink, appearing to read "David Martin".

David Martin

GM/Controller

Alco Products, LLC

CC: Jenine Camilleri, EGLE

Susan Lynn Johnson, Esq.