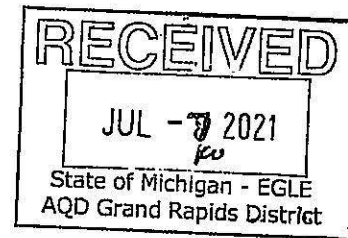


July 6, 2021

To: EGLE, AQD, Grand Rapids District
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503

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



In November 2019, R.L. Adams renewed its Renewable Operating Permit (ROP). As a result of this renewal, the department of Environment, Great Lakes, and Energy (EGLE) added a new Testing/Sampling condition to the newly issued permit. The new condition required that R.L. Adams determine the Isopentane content of the full range of finished goods annually. In May 2021, after the completion of the first test, it was determined that the finished goods were not retaining all of the Isopentane. EGLE conducted a review of the May 28th laboratory test results submitted by R.L. Adams Plastics. During the review, the following violations were found:

- Volatile Organic Compound (VOC) limit of 170 tons per year was exceeded.
- Isopentane material limit of 340,000 pounds per year was exceeded.
- Failure to identify the average isopentane content of the plate stock finished goods.
- Failure to properly calculate the VOC emission rate.

R.L. Adams took immediate action and conducted an exhaustive revision of the entire process from start to end. Using the Isopentane retention value from the May 28th test results,

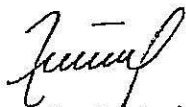
VOC emissions were re-calculated for the previous five years. The report attached shows R.L. Adams stayed in compliance with the conditions of its ROP, not exceeding the VOC limit of 170 tons per year.

R.L. Adams calculated both the Isopentane material limit and the VOC tons emitted using a formula developed by EGLE staff and R.L. Adams personnel. Due to the type of foam we produce, it was determined acceptable to record zero emissions from the finished goods. Taking that into account, R.L. Adams properly calculated the VOC emission rate, and identified the Isopentane content of the plate stock and laminate stock finished goods in the past. Air emissions were closely monitored to ensure our facility stayed in compliance with the material usage, and the VOC limit of 170 tons per year (340,000 lbs.).

After finding that our finished goods were emitting some Isopentane, we studied our process and the way in which data gets compiled. A new database was developed to scrutinize data more accurately and calculate emissions from the finished goods using the Isopentane retention value for each group of products from the May 28th test results. Attached please find the 12-month rolling time period VOC emissions record for the past five years with the updated Isopentane content.

If you have any further questions or need additional information, please do not hesitate to contact me at (616) 261-4400 Ext 245, or via email to aarrieta@goadams.com

Sincerely,

A handwritten signature in cursive script, appearing to read "Anette Arrieta".

Anette Arrieta
Industrial Engineer
R.L. Adams Plastics, Inc.