



7575 Fulton Street E
Ada, Michigan 49355

October 23, 2023

Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Air Quality Division
Grand Rapids District Office
350 Ottawa Ave., Unit 10
Grand Rapids, MI 49503

Re: Air Permit # 93-21A Violation Notice Response

Dear Ms. Lazzaro,

This letter is in response to the Violation Notice dated October 4, 2023, regarding the XS Manufacturing operations located on our Ada, MI campus. We exceeded our annual throughput limit for EU Energy Drinks – Group 1: VOC Content up to 114 lb. VOC per batch, on September 6, 2023. As of October 23, the XS Manufacturing Plant has produced 19 batches of XS Blood Orange since January 1st, 2023. Per the latest production plan for XS, we are scheduled to produce another 8 batches before the end of the year. The exceedance was due to an operational risk we took in December 2022 when we submitted the last permit modification application. That risk was based off potential sales drop for that flavor and to provide additional capacity within the three remaining groups. Additional manufacturing orders were also placed in this group to increase stock for a potential formula change that could occur in Q1 2024. If that change does come to fruition, another permit modification will be submitted reflecting those changes.

Due to this violation, we are proposing the modification to the group's annual throughput limits as well as which flavors make up those groups based on updated VOC calculations. With these proposed changes, Amway XS Manufacturing will still be able to maintain the 31.5 tons/year VOC limit we are currently permitted to. The permit modification application will be sent out this week.

If you have any questions, please don't hesitate to reach out.

Thank you,

Ben Preston
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