

7575 Fulton Street E Ada, Michigan 49355



January 4, 2023

Michigan Department of Environment, Great Lakes, and Energy Air Quality Division 350 Ottawa Ave. NW, Unit 10 Grand Rapids, MI 49503-2341

Re: XS Air Permit Violation Notice (PTI No. 93-21)

Dear Ms. DeVries,

This letter is in response to the Violation Notice dated December 21, 2022, regarding Amway's XS Manufacturing Plant (EUENERGYDRINKS). Starting in June 2022, we have been exceeding our annual maximum batch throughput on a rolling 12-month basis of 225 batches for Group 4 (VOC content up to 29 lbs. per batch). The monthly rolling-12 totals are as follows.

June – 235 July – 243 August – 231 September – 247 October – 245 November – 226 December – 258

The initial outage was missed due to a recordkeeping error. Our recordkeeping was set up to track annual batches over a calendar year, not a rolling-12 monthly total. Once the correction was made, we discovered the exceedance. Due to the demand of these flavors, the outage has continued through December 2022 and will do so moving forward.

Based on the forecasted demand for these flavors, as well as a process change which increases our volumes, Amway has recently submitted a new Permit to Install application to raise the allowable limits within this facility. The required documents were sent via certified mail on December 29, 2022

If you have any further questions, please do not hesitate to contact me.

Thank you,

Ben Preston EH&S Supervisor

(616) 787-7507

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