

July 16, 2021

Department of Environment, Great Lakes, and Energy Air Quality Division, Warren Division Attn: Mr. Robert Elmouchi, Sr. Environmental Quality Analyst 27700 Donald Court Warren, Michigan 48092

**RE: Hoover Road Real Estate, LLC Violation Notice Response** 



Dear Mr. Elmouchi:

LivWell Enlightened Health, tenant of 21590 Hoover Road, Warren, Michigan 48089, on behalf of Hoover Road Real Estate, LLC (HRRE) submits the following response to the requested information in the Violation Notice, dated June 29, 2021 (Violation Notice).

1.) The violation occurred, per PTI 10-20A, FGCOGEN, Special Condition V.1, when the required testing was not performed in 180 days after the startup of each engine. Per the Violation Notice and our accounting this would be December 12, 2020.

2.) Due to COVID related mandatory restrictions, travel restrictions, and associated business and market disruptions, HRRE was severely hindered in its efforts to comply with emissions testing by the deadline. There was no way to anticipate the challenges in scheduling. As of the date of this letter the duration of this violation is 216 days and is currently ongoing.

3.) After initiating communication with Air Hygiene International, Inc, (AHI) a certified testing group, a purchase order for EGLE compliance engine testing was finally formalized on June 25, 2021.

4.) The PTI 10-20A required testing is currently scheduled for September 28-30, 2021. A purchase order relating to this testing is attached for your reference.

5.) HRRE intends to coordinate with EGLE to facilitate onsite supervision during the test.

6.) Now, with a formal relationship with AHI, the required annual testing will be scheduled well in advance of the annual deadline. This will prevent a recurrence of the violation and affirm our commitment to ensuring air quality.



Premises Address: 500 East 84<sup>th</sup> Avenue, Suite W-5, Thornton CO 80229 Mailing Address: 400 East 84<sup>th</sup> Avenue, Suite W-5, Thornton CO 80229



We apologize for the delay in securing the required testing and appreciate EGLE's patience and understanding as we diligently pursue verification of compliant emissions. Should you have any additional questions please do not hesitate to contact me.

Sincerely,

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Anna Hatch, Esq. General Counsel, LivWell Enlightened Health 818-219-1274 Anna.hatch@livwell.com

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

Ms. Karen Kajiya-Mills, Unit Supervisor, Technical Programs Unit, EGLE, Air Quality Division, Constitution Hall, 2nd Floor South, 525 West Allegan Street, Lansing, MI 48933

Ms. Joyce Zhu, District Supervisor, Air Quality Division, Warren District Office, EGLE, 27700 Donald Court, Warren, MI 48092-2793



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