

Richard E. Dunn, Director

Air Protection Branch

4244 International Parkway, Suite 120 Atlanta, Georgia 30354 404-363-7000

MEMORANDUM:

TO: Stephen Damaske THROUGH: Daniel McCain FROM: Marie Miller

SUBJECT: SOURCE TEST REPORT REVIEW

SUBJECT: S The following test has be		EST REPORT REVIEW ed and was conducted i		ion for the purpose int	ended.	
COMPANY NAME		KPR U.S. LLC				
COMPANY LOCATION		Atlanta, GA				
SOURCE TESTED		Exhaust Fans (EF1 ar	nd EF2)			
POLLUTANT DETERMIN	NED	Ethylene Oxide				
REPORT REVIEWED B	Y	Marie Miller				
TEST WITNESSED BY		Marie Miller				
DATE(S) OF TEST		December 8, 2020 to	December 11, 2020			
DATE RECEIVED BY AF	РВ	January 4, 2021				
MAXIMUM EXPECTED OPERATING CAPACITY	′	N/A				
OPERATING CAPACITY	/	N/A				
ALLOWABLE EMISSION	N RATE	N/A				
APPLICABLE REGULAT	ΓΙΟΝ	N/A				
CONTROL EQUIPMENT AND MONITORING DATA		N/A				
TEST RI	JN#	1	2	3	AVERAGE	
GAS TEMPERATURE	EF1	65	70	70		
(°F)	EF2	68	69	70		
GAS MOISTURE (%)	EF1	2.1	2.5	2.5		
	EF2	2.4	2.5	2.5		
GAS FLOW RATE	EF1	33782	22448	24033		
(ACFM)	EF2	20098	24343	25172		
GAS FLOW RATE	EF1					
(DSCFM)	EF2					
POLLUTANT CONCENTRATION	EF1	86	227	200	171	
(μg/m3)	EF2	97	254	189	180	
EMISSION RATE	EF1	0.0106	0.0185	0.0175	0.0156	
(LB/HR)	EF2	0.0071	0.0226	0.0173	0.0157	
TOTAL (LB/HR)						
PERCENT ALLOWABLE	(%)					
OTHER INFORMATION		lb/hr because the EtC) measurements wer	used to determine the e conducted on a wet es in units of DSCFM v	basis (using EPA	

Test results were reported for informational puposes. Facility does not currently

cc:Sean Taylor Reference Number:202100028 AIRS Number:12100965



Richard E. Dunn, Director

Air Protection Branch

4244 International Parkway, Suite 120 Atlanta, Georgia 30354 404-363-7000

have permitted EtO emission limits.

cc:Sean Taylor AIRS Number:12100965 Printed: 2/9/2021



Air Protection Branch

4244 International Parkway, Suite 120 Atlanta, Georgia 30354 404-363-7000

MEMORANDUM:

TO: Stephen Damaske THROUGH: Daniel McCain FROM: Marie Miller

		EST REPORT REVIEW		ion for the nurnose int	ended		
COMPANY NAME	CITICVICW	KPR U.S. LLC	ed and was conducted in an acceptable fashion for the purpose intended.				
COMPANY LOCATION		Atlanta, GA					
SOURCE TESTED		Exhaust Fans (EF3 ar	nd FF4)				
POLLUTANT DETERMIN	NED	Ethylene Oxide	=,				
REPORT REVIEWED BY		Marie Miller					
TEST WITNESSED BY		Marie Miller					
DATE(S) OF TEST		December 8, 2020 to	December 11, 2020				
DATE RECEIVED BY AF	 РВ	January 4, 2021					
MAXIMUM EXPECTED		N/A					
OPERATING CAPACITY		NI/A					
OPERATING CAPACITY ALLOWABLE EMISSION		N/A N/A					
APPLICABLE REGULAT		N/A					
CONTROL EQUIPMENT		N/A					
AND MONITORING DAT		IN/A	IV/A				
TEST RI	JN #	1	2	3	AVERAGE		
GAS TEMPERATURE	EF3	68	69	70			
(°F)	EF4	71	69	71			
GAS MOISTURE (%)	EF3	2.4	2.5	2.5			
	EF4	2.6	2.5	2.6			
GAS FLOW RATE	EF3	26278	25065	25215			
(ACFM)	EF4	24273	14301	17149			
GAS FLOW RATE	EF3						
(DSCFM)	EF4						
POLLUTANT CONCENTRATION	EF3	121	357	344	274		
(μg/m3)	EF4	153	255	244	217		
EMISSION RATE	EF3	0.0116	0.0326	0.0316	0.0253		
(LB/HR)	EF4	0.0135	0.0133	0.0152	0.0140		
TOTAL (LB/HR)	•						
PERCENT ALLOWABLE	(%)						
OTHER INFORMATION		lb/hr because the EtC Method TO-15). The) measurements were refore Gas Flow Rate	used to determine the e conducted on a wet es in units of DSCFM v I puposes. Facility do	basis (using EPA were not reported.		

cc:Sean Taylor AIRS Number:12100965 Printed: 2/9/2021



Richard E. Dunn, Director

Air Protection Branch

4244 International Parkway, Suite 120 Atlanta, Georgia 30354

have permitted EtO emission limits.

cc:Sean Taylor

AIRS Number:12100965

Reference Number:202100029 Printed: 2/9/2021



Richard E. Dunn, Director

Air Protection Branch

4244 International Parkway, Suite 120 Atlanta, Georgia 30354 404-363-7000

MEMORANDUM:

TO: Stephen Damaske THROUGH: Daniel McCain FROM: Marie Miller

SUBJECT: S The following test has be		EST REPORT REVIEW ed and was conducted i		ion for the purpose into	ended.		
COMPANY NAME		KPR U.S. LLC					
COMPANY LOCATION		Atlanta, GA					
SOURCE TESTED		Exhaust Fans (EF5 ar	nd EF6)				
POLLUTANT DETERMIN	NED	Ethylene Oxide					
REPORT REVIEWED BY	Y	Marie Miller					
TEST WITNESSED BY		Marie Miller					
DATE(S) OF TEST		December 8, 2020 to	December 11, 2020				
DATE RECEIVED BY AF	В	January 4, 2021					
MAXIMUM EXPECTED OPERATING CAPACITY	,	N/A					
OPERATING CAPACITY	•	N/A					
ALLOWABLE EMISSION	I RATE	N/A					
APPLICABLE REGULAT	ION	N/A					
CONTROL EQUIPMENT AND MONITORING DATA		N/A					
TEST RU	JN #	1	2	3	AVERAGE		
GAS TEMPERATURE	EF5	69	70	71			
(°F)	EF6	63	67	72			
GAS MOISTURE (%)	EF5	2.5	2.5	2.6			
	EF6	2.0	2.3	2.7			
GAS FLOW RATE	EF5	32357	21399	23478			
(ACFM)	EF6	26205	14995	19620			
GAS FLOW RATE	EF5						
(DSCFM)	EF6						
POLLUTANT CONCENTRATION	EF5	151	225	201	192		
(µg/m3)	EF6	138	208	208	184		
EMISSION RATE	EF5	0.0178	0.0175	0.0171	0.0175		
(LB/HR)	EF6	0.0133	0.0114	0.0148	0.0132		
TOTAL (LB/HR)							
PERCENT ALLOWABLE (%)							
OTHER INFORMATION		lb/hr because the Et0 Method TO-15). The	D measurements were refore Gas Flow Rate	used to determine the e conducted on a wet t es in units of DSCFM w Il puposes. Facility doe	pasis (using EPA vere not reported.		

cc:Sean Taylor AIRS Number:12100965 Printed: 2/9/2021



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4244 International Parkway, Suite 120 Atlanta, Georgia 30354 404-363-7000

have permitted EtO emission limits.

cc:Sean Taylor AIRS Number:12100965 Reference Number:202100030



Air Protection Branch

4244 International Parkway, Suite 120 Atlanta, Georgia 30354 404-363-7000

MEMORANDUM:

Stephen Damaske TO: THROUGH: Daniel McCain FROM: Marie Miller

SOURCE TEST REPORT REVIEW SUBJECT:

The following test has been reviewed and was conducted in an acceptable fashion for the purpose intended.

COMPANY NAME	een review	KPR U.S. LLC	ın an acceptable fash	ion for the purpose int	ended.
COMPANY LOCATION		Atlanta, GA			
SOURCE TESTED		Exhaust Fans (EF7 a	nd EF8)		
POLLUTANT DETERMI	NED	Ethylene Oxide	<u></u> , -,		
REPORT REVIEWED B		Marie Miller			
TEST WITNESSED BY		Marie Miller			
DATE(S) OF TEST			December 11, 2020		
DATE RECEIVED BY AF	PB	January 4, 2021			
MAXIMUM EXPECTED	_	N/A			
OPERATING CAPACITY		1 1/4			
OPERATING CAPACITY		N/A			
ALLOWABLE EMISSION		N/A			
APPLICABLE REGULAT	TION	N/A			
CONTROL EQUIPMENT AND MONITORING DAT		N/A			
TEST RI		1	2	3	AVERAGE
GAS TEMPERATURE	EF7	63	67	69	
(°F)	EF8	61	66	72	
GAS MOISTURE (%)	EF7	2.0	2.3	2.5	
	EF8	1.9	2.2	2.7	
GAS FLOW RATE	EF7	26400	18295	22207	
(ACFM)	EF8	23385	24448	25733	
GAS FLOW RATE	EF7				
(DSCFM)	EF8				
POLLUTANT CONCENTRATION	EF7	126	174	190	163
(µg/m3)	EF8	160	230	264	218
EMISSION RATE	EF7	0.0123	0.0117	0.0154	0.0131
(LB/HR)	EF8	0.0139	0.0206	0.0246	0.0197
TOTAL (LB/HR)					
PERCENT ALLOWABLE	(%)			1	
OTHER INFORMATION	\ <i>\</i>	lb/hr because the Etc	nits of WSCFM were u O measurements were erefore Gas Flow Rate	e conducted on a wet	basis (using EPA
		Test results were ren	orted for informationa	l nunoses Eacility do	es not currently

Test results were reported for informational puposes. Facility does not currently

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have permitted EtO emission limits.

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Printed: 2/9/2021

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MEMORANDUM:

Stephen Damaske TO: THROUGH: Daniel McCain FROM: Marie Miller

SOURCE TEST REPORT REVIEW SUBJECT:

The following test has	book reviewed and was	conducted in an acco	ntable faction for the	nurnaga intended
The following test has	been reviewed and was	conducted in an acce	plable fashion for the	purpose intended.

The following test has be	en reviewe	ed and was conducted	in an acceptable fash	ion for the purpose int	ended.			
COMPANY NAME		KPR U.S. LLC						
COMPANY LOCATION		Atlanta, GA	Atlanta, GA					
SOURCE TESTED		Exhaust Fans (EF9 a	and EF10)					
POLLUTANT DETERMIN	NED	Ethylene Oxide						
REPORT REVIEWED B	Y	Marie Miller						
TEST WITNESSED BY		Marie Miller						
DATE(S) OF TEST		December 8, 2020 to	December 11, 2020					
DATE RECEIVED BY AF	РВ	January 4, 2021						
MAXIMUM EXPECTED OPERATING CAPACITY	,	N/A						
OPERATING CAPACITY	′	N/A						
ALLOWABLE EMISSION	N RATE	N/A						
APPLICABLE REGULAT	ION	N/A						
CONTROL EQUIPMENT AND MONITORING DATA		N/A						
TEST RI	JN#	1	2	3	AVERAGE			
GAS TEMPERATURE	EF9	62	73	74				
(°F)	EF10	64	67	70				
GAS MOISTURE (%)	EF9	1.9	2.8	2.9				
	EF10	2.1	2.3	2.5				
GAS FLOW RATE	EF9	30085	26159	28934				
(ACFM)	EF10	25571	18078	20542				
GAS FLOW RATE	EF9							
(DSCFM)	EF10							
POLLUTANT CONCENTRATION	EF9	122	224	190	178			
(µg/m3)	EF10	124	280	240	215			
EMISSION RATE	EF9	0.0136	0.0212	0.0199	0.0182			
(LB/HR)	EF10	0.0117	0.0186	0.0180	0.0161			
TOTAL (LB/HR)								
PERCENT ALLOWABLE	(%)							
OTHER INFORMATION		lb/hr because the Et Method TO-15). The	nits of WSCFM were on the measurements were erefore Gas Flow Rate ported for informational	e conducted on a wet es in units of DSCFM v	basis (using EPA vere not reported.			

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MEMORANDUM:

TO: Stephen Damaske THROUGH: Daniel McCain FROM: Marie Miller

_	SUBJECT: SOURCE TEST REPORT REVIEW						
The following test has be	en reviewe	ed and was conducted	in an acceptable fash	ion for the purpose int	ended.		
COMPANY NAME		KPR U.S. LLC					
COMPANY LOCATION		Atlanta, GA					
SOURCE TESTED		Exhaust Fans (EF11	and EF12)				
POLLUTANT DETERMIN	NED	Ethylene Oxide					
REPORT REVIEWED BY	Y	Marie Miller					
TEST WITNESSED BY		Marie Miller					
DATE(S) OF TEST		December 8, 2020 to	December 11, 2020				
DATE RECEIVED BY AF	В	January 4, 2021					
MAXIMUM EXPECTED OPERATING CAPACITY	•	N/A					
OPERATING CAPACITY	•	N/A					
ALLOWABLE EMISSION	I RATE	N/A					
APPLICABLE REGULAT	ION	N/A					
CONTROL EQUIPMENT AND MONITORING DAT		N/A					
TEST RU	JN #	1	2	3	AVERAGE		
GAS TEMPERATURE	EF11	67	67	67			
(°F)	EF12	68	67	74			
GAS MOISTURE (%)	EF11	2.3	2.3	2.9			
	EF12	2.4	2.3	2.9			
GAS FLOW RATE	EF11	25897	23401	25195			
(ACFM)	EF12	17767	23163	24952			
GAS FLOW RATE	EF11						
(DSCFM)	EF12						
POLLUTANT CONCENTRATION	EF11	110	307	274	230		
(µg/m3)	EF12	157	229	194	193		
EMISSION RATE	EF11	0.0104	0.0263	0.0250	0.0205		
(LB/HR)	EF12	0.0102	0.0194	0.0175	0.0157		
TOTAL (LB/HR)							
PERCENT ALLOWABLE (%)				•	-		
OTHER INFORMATION		lb/hr because the Etc Method TO-15). The	O measurements were erefore Gas Flow Rate	used to determine the e conducted on a wet es in units of DSCFM v Il puposes. Facility do	basis (using EPA vere not reported.		

cc:Sean Taylor AIRS Number:12100965 Printed: 2/9/2021



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Air Protection Branch

4244 International Parkway, Suite 120 Atlanta, Georgia 30354 404-363-7000

have permitted EtO emission limits.

cc:Sean Taylor AIRS Number:12100965 Reference Number:202100033



Richard E. Dunn, Director

Air Protection Branch

4244 International Parkway, Suite 120 Atlanta, Georgia 30354 404-363-7000

MEMORANDUM:

TO: Stephen Damaske THROUGH: Daniel McCain FROM: Marie Miller

SUBJECT: S The following test has be		EST REPORT REVIEW		ion for the purpose int	ended.		
COMPANY NAME		KPR U.S. LLC	· · · · · · · · · · · · · · · · · · ·				
COMPANY LOCATION		Atlanta, GA					
SOURCE TESTED		Exhaust Fans (EF13	and EF14)				
POLLUTANT DETERMIN	NED	Ethylene Oxide	•				
REPORT REVIEWED B	Y	Marie Miller					
TEST WITNESSED BY		Marie Miller					
DATE(S) OF TEST		December 8, 2020 to	December 11, 2020				
DATE RECEIVED BY AF	PB	January 4, 2021					
MAXIMUM EXPECTED OPERATING CAPACITY	′	N/A					
OPERATING CAPACITY		N/A					
ALLOWABLE EMISSION	N RATE	N/A					
APPLICABLE REGULAT	TION	N/A					
CONTROL EQUIPMENT		N/A					
TEST RI	JN#	1	2	3	AVERAGE		
GAS TEMPERATURE	EF13	65	67	75			
(°F)	EF14	65	68	73			
GAS MOISTURE (%)	EF13	2.1	2.3	3.0			
	EF14	2.1	2.4	2.8]		
GAS FLOW RATE	EF13	23958	25348	26950			
(ACFM)	EF14	21863	21992	23549			
GAS FLOW RATE	EF13						
(DSCFM)	EF14						
POLLUTANT	EF13	163	228	207	199		
CONCENTRATION (µg/m3)	EF14	116	183	172	157		
EMISSION RATE	EF13	0.0144	0.0212	0.0201	0.0185		
(LB/HR)	EF14	0.0093	0.0147	0.0147	0.0129		
TOTAL (LB/HR)							
PERCENT ALLOWABLE	(%)						
OTHER INFORMATION		lb/hr because the Et0 Method TO-15). The	O measurements were erefore Gas Flow Rate	used to determine the e conducted on a wet es in units of DSCFM v al puposes. Facility do	basis (using EPA vere not reported.		

cc:Sean Taylor AIRS Number:12100965 Printed: 2/9/2021



Richard E. Dunn, Director

Air Protection Branch

4244 International Parkway, Suite 120 Atlanta, Georgia 30354 404-363-7000

have permitted EtO emission limits.

cc:Sean Taylor AIRS Number:12100965 Reference Number:202100034



Air Protection Branch

4244 International Parkway, Suite 120 Atlanta, Georgia 30354 404-363-7000

MEMORANDUM:

TO: Stephen Damaske THROUGH: Daniel McCain FROM: Marie Miller

		EST REPORT REVIEW		ion for the number int	andad		
	en reviewe	ed and was conducted in an acceptable fashion for the purpose intended.					
COMPANY NAME COMPANY LOCATION		KPR U.S. LLC					
SOURCE TESTED		Atlanta, GA	and FF16)				
POLLUTANT DETERMIN	JED	Exhaust Fans (EF15	anu Er 10)				
		Ethylene Oxide					
REPORT REVIEWED BY TEST WITNESSED BY	<u>r</u>	Marie Miller Marie Miller					
-			December 11, 2020				
DATE DECEIVED BY A	ND	i i	December 11, 2020				
DATE RECEIVED BY AF	'B	January 4, 2021					
MAXIMUM EXPECTED OPERATING CAPACITY	,	N/A					
OPERATING CAPACITY	•	N/A					
ALLOWABLE EMISSION	RATE	N/A					
APPLICABLE REGULAT	ION	N/A					
CONTROL EQUIPMENT AND MONITORING DATA		N/A					
TEST RU	JN #	1	2	3	AVERAGE		
GAS TEMPERATURE	EF15	53	73	73			
(°F)	EF16	70	70	73			
GAS MOISTURE (%)	EF15	1.4	2.8	2.8			
	EF16	2.5	2.5	2.8			
GAS FLOW RATE	EF15	18033	23063	22876]		
(ACFM)	EF16	27626	21617	23751]		
GAS FLOW RATE	EF15]		
(DSCFM)	EF16						
POLLUTANT CONCENTRATION	EF15	97	165	158	140		
(µg/m3)	EF16	95	159	187	147		
EMISSION RATE	EF15	0.0066	0.0138	0.0131	0.0112		
(LB/HR)	EF16	0.0096	0.0125	0.0161	0.0127		
TOTAL (LB/HR)							
PERCENT ALLOWABLE (%)							
OTHER INFORMATION		lb/hr because the Etc Method TO-15). The	O measurements were erefore Gas Flow Rate	used to determine the e conducted on a wet es in units of DSCFM v al puposes. Facility do	basis (using EPA vere not reported.		

cc:Sean Taylor AIRS Number:12100965 Printed: 2/9/2021



have permitted EtO emission limits.

Richard E. Dunn, Director

Air Protection Branch

4244 International Parkway, Suite 120 Atlanta, Georgia 30354 404-363-7000

cc:Sean Taylor

AIRS Number:12100965

Reference Number:202100035

Air Protection Branch

4244 International Parkway, Suite 120 Atlanta, Georgia 30354 404-363-7000

MEMORANDUM:

Stephen Damaske TO: THROUGH: Daniel McCain Marie Miller FROM:

SUBJECT: SOURCE TEST REPORT REVIEW

The following test has been reviewed and was conducted in an acceptable fashion for the purpose intended.

The felletting teet has been fevrett	od dila was seriadeted in an asseptable lasinen for the purpose interlasa.
COMPANY NAME	KPR U.S. LLC
COMPANY LOCATION	Atlanta, GA
SOURCE TESTED	Fence Line (FL1-FL4)
POLLUTANT DETERMINED	Ethylene Oxide
REPORT REVIEWED BY	Marie Miller
TEST WITNESSED BY	Not Witnessed
DATE(S) OF TEST	December 8, 2020 to December 11, 2020
DATE RECEIVED BY APB	January 4, 2021
APPLICABLE REGULATION	N/A
MEMORANDUM	Ethylene Oxide sampling was conducted at four ambient fence line locations

Ethylene Oxide sampling was conducted at four ambient fence line locations (FL1-FL4) using EPA Method TO-15. FL1 sampling was conducted south of the

facility. FL2 sampling was conducted north of the facility. FL3 sampling was conducted west of the facility. FL4 sampling was conducted east of the facility.

Please see table below for reported EtO concentrations in units of ug/m3.

Location	Run 1	Run 2	Run 3	Average
FL1	0.575	0.618	1.60	0.931
FL2	0.437	0.920	1.30	0.886
FL3	0.531	1.02	1.87	1.14
FL4	1.67	1.35	1.44	1.49

cc: Sean Taylor AIRS Number: 12100965 Printed: 2/9/2021 Reference Number: 202100036

Air Protection Branch

4244 International Parkway, Suite 120 Atlanta, Georgia 30354 404-363-7000

MEMORANDUM:

Stephen Damaske THROUGH: Daniel McCain Marie Miller FROM:

SUBJECT: SOURCE TEST REPORT REVIEW

The following test has been reviewed and was conducted in an acceptable fashion for the purpose intended.

The following test has been reviewed and was conducted in an acceptable fashion for the purpose interface.				
COMPANY NAME	KPR U.S. LLC			
COMPANY LOCATION	Atlanta, GA			
SOURCE TESTED	Input Fans (IF1, IF2, IF4, IF6 - IF9) and Inside Warehouse (IW2)			
POLLUTANT DETERMINED	Ethylene Oxide			
REPORT REVIEWED BY	Marie Miller			
TEST WITNESSED BY	Not Witnessed			
DATE(S) OF TEST	December 8, 2020 to December 11, 2020			
DATE RECEIVED BY APB	January 4, 2021			
APPLICABLE REGULATION	N/A			

MEMORANDUM

Ethylene Oxide sampling results were reported for seven intake fans (IF1, IF2, IF4, IF6 - IF9) and one inside warehouse location (IW2) using EPA Method TO-15. No results were reported for Air Intake Fans IF3 and IF5 because they were not operational during the EtO sampling event.

Please see table below for reported EtO concentrations in units of ug/m3.

Location	Run 1	Run 2	Run 3	Average
IF1	0.819	1.77	2.06	1.55
IF2	1.24	2.77	2.4	0 2.14
IF4	1.17	2.78	2.51	2.15
IF6	1.24	2.28	2.46	1.96
IF7	1.15	2.53	2.63	2.10
IF8	1.16	1.96	2.83	1.98
IF9	1.52	2.71	2.92	2.35
IW2	121	184	172	160

Please see table below for reported EtO emission rates in units of lb/hr.

Location	Run 1	Run 2	Run 3	Average
IF1	0.000095	0.000284	0.000311	0.000230
IF2	0.000169	0.000_0.	0.000469	0.000200
IF4	0.000166	0.000332	0.000403	0.00000
IF6	0.000100		0.000417	
	0.000169	0.000316		
IF7	0.000.0.		0.000427	
IF8	0.000192	0.000256	0.000496	
IF9	0.000255	0.000451	0.000590	0.000426

Reported results are for informational purposes only.

cc: Sean Taylor AIRS Number: 12100965 Reference Number: 202100037 Printed: 2/9/2021