



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
MARQUETTE DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

August 10, 2021

VIA E-MAIL

Mr. Erik Kiilunen  
Neuvokas  
3206 Number 6 Road  
Ahmeek, Michigan 49901

SRN: U422100057, Keweenaw County

Dear Mr. Kiilunen:

**VIOLATION NOTICE**

On August 6, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an odor survey of Neuvokas located at 3206 Number 6 Road, Ahmeek, Michigan. The purpose of this inspection was to determine Neuvokas compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and to investigate a recent complaint which we received on August 5, 2021, regarding foul odors attributed to Neuvokas's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Fiber reinforced polymer rebar manufacturing	R 336.1901(b)	Sweet, citrus like odor affecting the surrounding residential area. The odor has a strong intensity and occurs daily throughout the day when the facility is manufacturing.

In the professional judgment of AQD staff, the odors that were detected were of sufficient intensity, frequency and duration so as to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451.

R 336.1901 Air contaminant or water vapor; prohibition. Notwithstanding the provisions of any other rule, a person shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:

- a) Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.
- b) Unreasonable interference with the comfortable enjoyment of life and property.

The AQD has received five odor complaints attributed to Neuvokas's operations during the period January 5, 2021 through August 5, 2021. The odors have been reported as having sufficient intensity to avoid being outside at property and closing windows of houses. On

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August 6, 2021, AQD staff detected strong odors in the surrounding residential area near the Neuvokas facility. The odors were detected for over an hour period with being characterized as a sweet, chemical scent with strong intensity.

Neuvokas has reported improving stack design and exhaust flow, however, foul odors with intensity, frequency, and duration are still being reported and were detected by AQD staff. During the odor survey, AQD staff noticed the overhead doors to the facility were open for ventilation and could be contributing to the foul odors in the area.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 31, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Marquette District, at 1504 West Washington Street, Marquette, Michigan 49855 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Neuvokas believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Neuvokas. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Michael Conklin  
Environmental Engineer  
Air Quality Division  
906-202-0013

cc: Mr. Matt Kero, Neuvokas  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Ed Lancaster, EGLE