



Subject: Violation Notice from EGLE AQD on 8/10/2021

Dear Mr. Conklin,

The purpose of this letter is to explain our position and explain what we are doing to mitigate the situation as described in the letter dated 8/10/21. We hope everyone understands that we do take this seriously and we want to ensure Ahmeek, MI is a desirable place for all of us to live and work.

Here at Neuvokas we manufacture a composite rebar that is 80% fiber and about 20% resin. This product is shipped throughout the country and we are processing 540,000 lbs of fiber and resin through our Ahmeek facility monthly.

In January of 2020 Neuvokas transitioned from an epoxy-based resin to a DCPD based resin system. This was done for a variety of product performance and processing reasons. We evaluated the system for VOC emissions and made ventilation decisions based on that evaluation. In January of 2021 we received notice of a foul odor complaint and we received a report from you that was dated 1/26/2021. This report is attached as an Attachment to this response.

Prior to the notice in January of 2021, we have worked to continuously improve the ventilation and discharge from the Neuvokas facility because we want to be a good neighbor and bring value to the community. Originally, we had all of our venting through the side walls of our facility and in June of 2020 we converted to overhead piping with the goal of diffusing the discharge instead of letting it settle at ground level. In August of 2020 we converted one of our induction fans to a high velocity fan that can handle higher head pressures and create a higher velocity exit discharge. Again, the goal of all of this was to diffuse the discharge as it exits the Neuvokas facility.

In June of 2021 we received an email that stated further complaints had been received. At this point we reworked the exhaust ventilation to increase the discharge elevation, reduced the discharge exhaust piping diameter (increase discharge velocity) and installed a different style discharge cap that is designed to minimize exhaust restrictions while allowing vertical exhaust. At the same time, we eliminated another discharge fan that was venting general shop air at ground level. To encourage air to leave our facility through the main ducting we also increased the amount of powered intake fans to provide a known amount of air into the Neuvokas facility.

As we have completed these improvements, we have seen increased production as our sales demand has resulted in rapid company growth. This summer has seen some higher than typical temperatures which has resulted in our garage doors being open an increased amount.

On August 10<sup>th</sup> we received a letter that talked of further complaints against Neuvokas. We have had maintained a budget for fume improvements and this letter put our further planned improvements to the front of our priorities. We immediately made some changes plus we ordered some components to make continued updates. These are explained in more detail below.

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- High velocity fans – Two additional fans have been ordered. These fans will be used to replace current discharge fans. These fans have not arrived yet, but are expected to arrive at the end of August. These fans will be installed in ductwork with increased amounts of fumes
- Increased and controlled fresh air intakes – We are working to size and source the appropriately sized fans to control intake air. When implemented this will allow garage doors to remain closed, controlling the plenum, to improve the general air flow throughout the Neuvokas facility.
- Discharge Air – We did another survey of air that is leaving our facility and discovered our air compressor was venting air directly outside at ground level. This discharge was reversed and used as a fresh air intake. This eliminated discharge and increased positive airflow into the facility.
- Additional fume collection via hoods – To collect fumes from areas that have potential for discharge we have designed hoods that will direct fumes to overhead exhaust. These are on order and are expected at the end of August
- Fume Masking – Neuvokas fumes are detectable by people at very low levels. Our resin suppliers can supply a material to mask the fumes so that they may be less bothersome. We have hesitated to use this method, but it is an option that is currently being considered.
- Continued optimization and Improvements – We have purchased smoke generating candles that will be used to visually understand air flow throughout our facility. We have done this in the past and it has great benefits to visually understand the areas that are issues for air flow

To summarize we have numerous items in process and our goal is to minimize the effect these fumes have on the local community. As a manufacturer and neighbor to all of everyone in this area we do want to do our best to resolve this issue. Based on the letter referencing “Unreasonable interference with the comfortable enjoyment of life and property” we do not have a fixed target of how success will actually be measured. We hope that all parties will understand that we are a rapidly growing business that has no intention of causing local disturbances.

Thank you and sincerely,



Matt Kero

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