



**AMERICA'S REBAR**

Subject: Violation Notice, U422100057, from EGLE AQD on 10/20/2023

Dear Mr. Scanlan,

This letter is in response to the Violation Notice that was dated 10/20/2023. This letter contains a summary of continued odor mitigation practices and it reviews the conditions on the day of this violation.

To review a few items, Neuvokas and EGLE are working on a draft consent document that reviews continued improvement projects and further odor mitigation. This document will not cover those items.

During this violation notice period the Ecosorb odor treatment system was installed into all exhaust stacks and carbon filtration was being used. Total stack emissions were measured to be ~40 ppm, which is well below the threshold of 100 ppm that requires immediate carbon filtration media change. The overall effectiveness of the carbon also was high with over 50% of odors being removed, based on before and after filtration readings. The weather conditions on 10/18 consisted of SouthEast to East winds at 5-10mph.

Following a detailed inspection of all equipment within the Neuvokas facility the only issue that was found was a drive belt that runs the Back Line curing room stack. This belt was found to be damaged and when replaced there was a 17% increase in exhaust velocity. This could have contributed to fumes, but it should be noted that overall emissions very measured to be low both before and after this belt was replaced. Generally decreased air flow can increase effectiveness and absorption by the carbon media. At the same time increased air flow creates exit velocity which improves the dispersion of any odors that do leave through the exhaust stack. This is an area of much discussion.

As mentioned above further odor mitigation will be part of the upcoming items that are currently in process between EGLE and Neuvokas.

Sincerely,

A handwritten signature in black ink that reads "Matt Kero". The signature is fluid and cursive.

Matt Kero

VP of Engineering

Neuvokas Corporation

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