



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 8, 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 December 1, 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 recent complaints which we received on November 29, 2021, and December 2, 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.

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A Violation Notice was issued on August 10, 2021, for odors from the Neuvokas facility affecting the surrounding residential area. A response from Neuvokas was received on August 27, 2021, describing a plan forward to improve the odor issue. This included installing high velocity fans for the exhaust ducts, fume collection hoods, and fresh air intakes to allow the overhead doors to the facility to remain closed. The response stated these improvements would be completed by the end of August 2021. Since the provided response, the AQD has continued to receive odor complaints attributed to Neuvokas's operations. The odors have been reported as having sufficient intensity to avoid being outside at property and closing windows of houses and vehicles. In a follow-up email, on December 1, 2021, the company stated the items described in the August 27, 2021, response have not been fully implemented.

On December 1, 2021, AQD staff conducted an odor survey to the south, west, northwest, and north of the facility to verify reported odors. Temperature at the time of the survey was 32-34 degrees Fahrenheit, with south wind at a speed of 8 mph. The odor survey was conducted from 2:00 p.m. to 2:45 p.m., $\frac{3}{4}$ of a mile northwest of the facility, near the post office in Ahmeek, the distinct odor was on a scale of 2. The odor can be characterized as a sweet, chemical scent with strong intensity. Odors increased to an odor intensity of 3 as staff approached the facility while driving southeast on 1st Street. Odor intensity was approximately 3-4 while directly northwest of the facility at the intersection of 1st Street and Number 6 Road.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 29, 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.

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Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Scanlan". The signature is fluid and cursive, with the first name "Joseph" and last name "Scanlan" clearly distinguishable.

Joseph Scanlan
Environmental Quality Analyst
Air Quality Division
906-458-6405

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
Mr. Michael Conklin, EGLE