



GRETCHEN WHITMER
GOVERNOR

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



AARON B. KEATLEY
ACTING DIRECTOR

June 29, 2023

VIA EMAIL AND U.S. MAIL

Erik Kiilunen
Neuvokas
3206 Number 6 Road
Ahmeek, Michigan 49901

SRN: U422100057, Keweenaw County

Dear Erik Kiilunen:

VIOLATION NOTICE

On June 15, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an odor evaluation in the vicinity of Neuvokas located at 3206 Number 6 Road, Ahmeek, Michigan. The purpose of this odor evaluation 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 ongoing odor complaints regarding foul odors attributed to Neuvokas' operations.

During the complaint investigation, 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 throughout the day when the facility is manufacturing. AQD staff verified these odors were in violation of Rule 901(b) on June 15, 2023.

In the professional judgment of AQD staff, the odors that were observed 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.

On June 15, 2023, AQD staff conducted an odor evaluation near Neuvokas in response to multiple odor complaints received during the period June 8th – 15th. The odors were described as being very strong and intolerable. During the odor evaluation conducted from 12:40 PM to 1:10 PM at a property directly south of and adjacent to Neuvokas, AQD staff detected strong odors with sufficient intensity, frequency, and duration to be in violation of Rule 901(b). Temperature at the time of the survey was 49 degrees Fahrenheit, with north/northwest winds at a speed of 2-10 mph. Odors were persistent throughout the survey; at no time were the odors not present.

The previous Rule 901(b) violations cited on August 10, 2021, and December 8, 2021, remain unresolved and ongoing. Neuvokas has not been able to meet timelines provided for implementing odor control solutions and the actions taken to-date have not been sufficient. The AQD continues to receive numerous strong odor complaints attributed to Neuvokas' operations.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 19, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. In the response, engineering solutions already examined by the company should be re-examined. Explanations of the reasons the company is either considering or rejecting them should be included in the response. Expeditious timelines for implementing proposed corrective actions should be presented.

Please submit the written response to EGLE, AQD, Marquette District, at 1504 West Washington Street, Marquette, Michigan 49855 and submit a copy to 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. 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,

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/via email: Courtney Bisbee, Neuvokas
Matt Kero, Neuvokas
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Michael Conklin, EGLE