



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

October 20, 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 October 18, 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 detected 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. AQD staff verified odors in violation of Rule 901(b) on October 18, 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(b) 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:

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- 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 October 18, 2023, AQD staff conducted an odor evaluation near Neuvokas in response to multiple odor complaints received during the period October 2<sup>nd</sup> – 17<sup>th</sup>. The odors were described as being very strong and intolerable. During the odor evaluation conducted from 1:27 PM to 2:05 PM, at a location near the intersection of Number 6 Road and 1<sup>st</sup> Street and directly west of 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 51 degrees Fahrenheit, with primarily southeast winds at a speed of approximately 7 mph. Odors were persistent throughout the survey. See enclosure for odor survey.

The previous Rule 901(b) violations cited on August 10, 2021, December 8, 2021, and June 29, 2023, remain unresolved and ongoing. 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 November 9, 2023 (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 Joseph Scanlan at EGLE, AQD, Marquette District, at 1504 West Washington Street, Marquette, Michigan 49855 or [ScanlanJ@Michigan.gov](mailto:ScanlanJ@Michigan.gov) 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.

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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

Enclosure

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

Source Name: Neuvokas		Inspector: J. SCANLAN		
Source Address: 3206 No. 6 Rd		Date: 10/18/23		
Sky Conditions: OVERCAST		Temperature: 51° F		
Wind Speed: ~7 mph	Wind Direction: SE - VARIES	Source of Meteorological Data: CAR & WEATHER APPS		
Location (attach map, if available)	Time	Odor Scale (See below)	Characteristic (See below)	Comments: (Observations that will aid in the determination of the source & properties of the odor)
Intersection of 1st St & No. 6 Rd	1:27	2	Sweet, citrus, RESIN	
	1:28	1		
	1:29	1		
	1:30	1		
	1:31	1		
	1:32	2		
	1:33	2		
	1:34	2		
	1:35	1		
	1:36	2		
	1:37	1		
	1:38	2		
	1:39	2		

**Odor Scale**  
 0 - Non-Detect  
 1 - Just barely detectable  
 2 - Distinct and definite odor  
 3 - Distinct and definite objectionable odor  
 4 - Odor strong enough to cause a person to attempt to avoid it completely  
 5 - Odor so strong as to be overpowering and intolerable for any length of time

**Odor characteristic examples:**  
 Paint-like  
 Musty, moldy  
 Burnt, smoky  
 Tar-like, asphalt  
 Cut grass  
 Citrus fruit



Source Name: Newvokas		Inspector: J. SCANLAN		
Source Address: 3206 No. 6 Rd		Date: 10/18/23		
Sky Conditions: Overcast		Temperature: 51° F		
Wind Speed: ~ 7 mph		Wind Direction: SE - VARIES		Source of Meteorological Data:
Location (attach map, if available)	Time	Odor Scale (See below)	Characteristic (See below)	Comments: (Observations that will aid in the determination of the source & properties of the odor)
	1:40	3		
	1:41	1		
	1:42	2		
	1:43	∅		
	1:44	1		
	1:45	2		
	1:46	2		
	1:47	3		
	1:48	2		
	1:49	3		
	1:50	2		
	1:51	3		
	1:52	3		
<u>Odor Scale</u> 0 - Non-Detect 1 - Just barely detectable 2 - Distinct and definite odor 3 - Distinct and definite objectionable odor 4 - Odor strong enough to cause a person to attempt to avoid it completely 5 - Odor so strong as to be overpowering and intolerable for any length of time			<u>Odor characteristic examples:</u> Paint-like Musty, moldy Burnt, smoky Tar-like, asphalt Cut grass Citrus fruit	

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Source Address: 3206 No. 6 Rd		Date: 10/18/23		
Sky Conditions: Overcast		Temperature: 51° F		
Wind Speed: ~ 7 mph	Wind Direction: SE - VARIES	Source of Meteorological Data:		
Location (attach map, if available)	Time	Odor Scale (See below)	Characteristic (See below)	Comments: (Observations that will aid in the determination of the source & properties of the odor)
	1:53	2		
	1:54	3		
	1:55	2		
	1:56	3		
	1:57	3		
	1:58	1		
	1:59	1		
	2:00	1		
	2:01	3		
	2:02	1		
	2:03	2		
	2:04	2		
	2:05	2		

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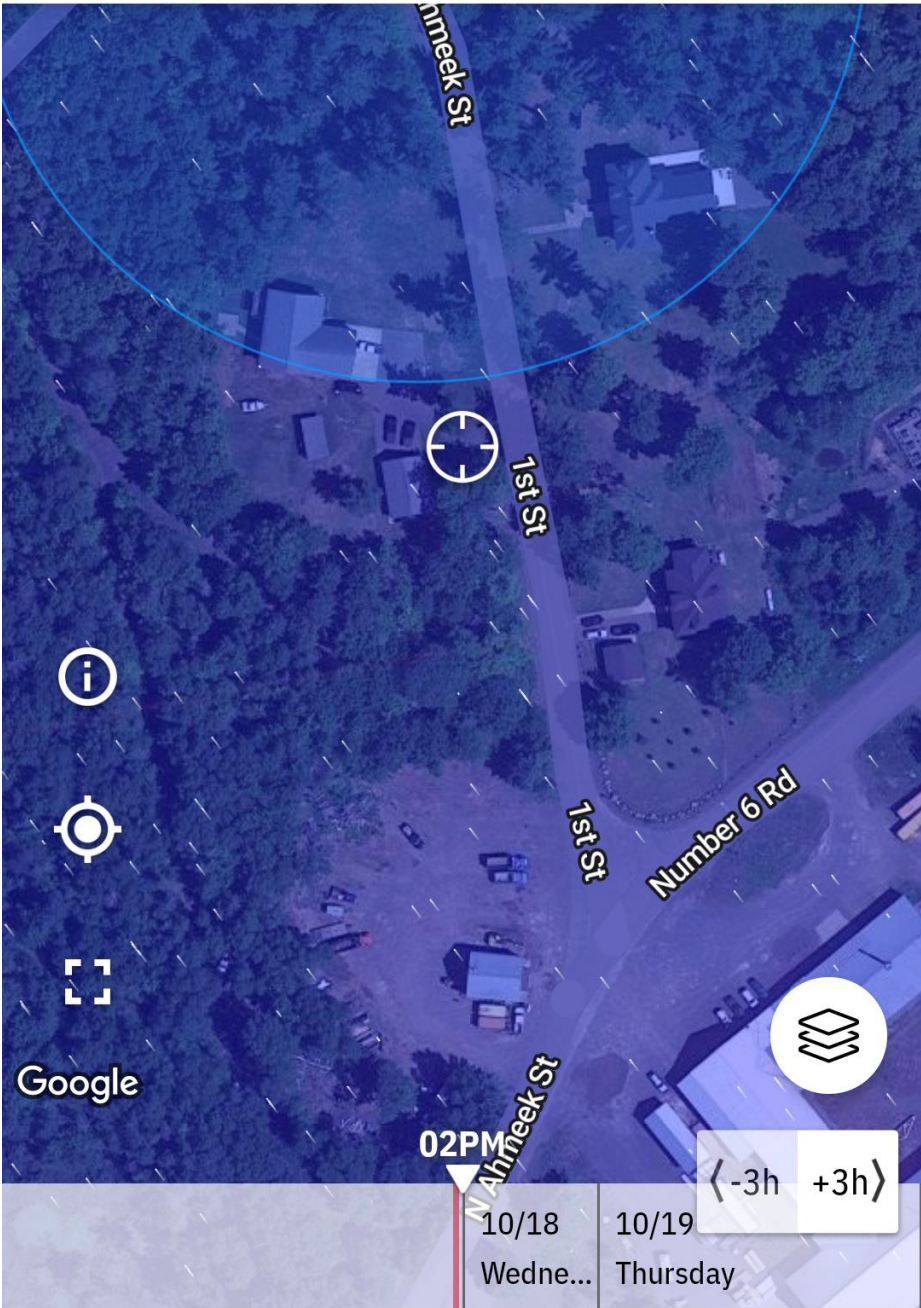


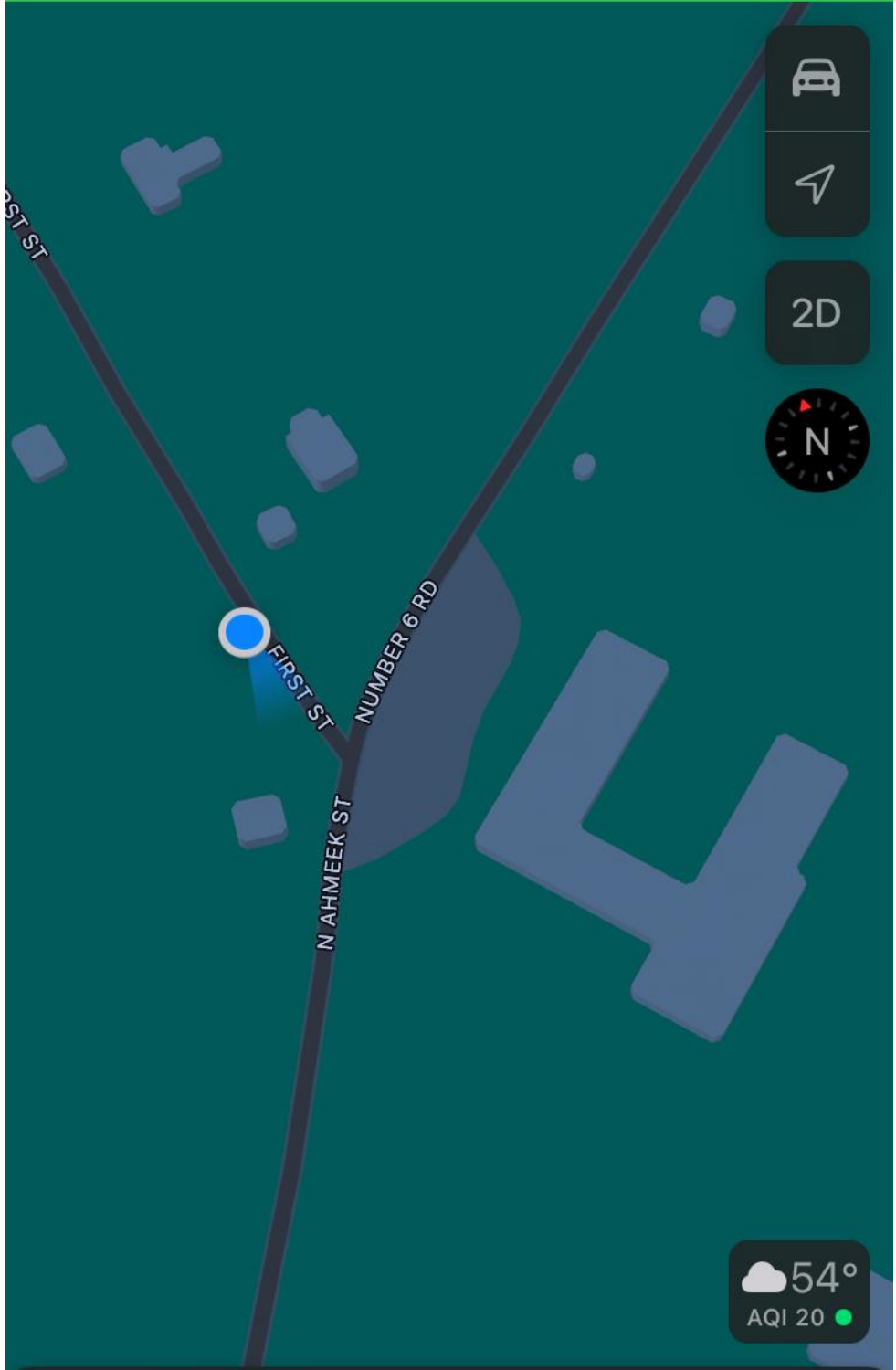


Lat: 47.2918 Lon: -88.3878 ×  
10/18/23, 02PM (UTC-04:00)

 DIRECTION  
143° (SE)

WIND SPEED  
7 mph





Navigation controls including a car icon, a compass icon, a '2D' button, and a circular compass showing North (N).

Weather widget showing a cloud icon, temperature 54°, and AQI 20 with a green dot.

Search Maps



JS