



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 8, 2024

VIA EMAIL AND U.S. MAIL

Erik Kiilunen
Neuvokas Corporation
3206 Number 6 Road
Ahmeek, Michigan, 49901

SRN: U422100057, Keweenaw County

Dear Erik Kiilunen:

VIOLATION NOTICE

On October 1, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an off-site inspection of Neuvokas located at 3206 Number 6 Road, Ahmeek, Michigan. The purpose of this records review was to determine Neuvokas's 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 Consent Order AQD No. 2024-11.

During the off-site inspection, staff identified the following:

Process Description	Rule/Permit Condition Violated	Comments
Fiber reinforced polymer rebar manufacturing	Paragraph 12.A of AQD No. 2024-11	The third-party consultant evaluation report was not submitted to the AQD within (30) days after the effective date of the Consent Order.

The third-party consultant evaluation report submission is enforceable as paragraph 12.A of Consent Order, AQD number 2024-11. The Consent Order required this report be submitted by August 22, 2024, which is 30 days after the effective date of the Consent Order. Neuvokas provided the evaluation report via email on October 4, 2024. This is considered a violation of paragraph 12.A of AQD No. 2024-11.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice October 28, 2024 (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. Also, please include some upcoming dates and times Neuvokas can meet with the AQD to discuss the evaluation report and future plans.

Please submit the written response to Jarod Maggio at EGLE, AQD, Marquette District Office, at 1504 West Washington Street, Marquette, Michigan 49855 or MaggioJ@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.

Sincerely,



Jarod Maggio
Environmental Quality Analyst
Air Quality Division
906-458-7930

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Michael Conklin, EGLE