



**INDUSTRIAL
METAL
COATING**

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K.L.
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MAY 09 2022

Air Quality Division
Warren Office

K.N.

March 28, 2022

VIA US MAIL

Kaitlyn Leffert
EGLE, AQD, Warren District
27700 Donald Court
Warren, Michigan 48092

RE: VIOLATION NOTICE MARCH 29, 2022
SRN: N5145

Dear Ms. Leffert:

I apologize for the delay. I wanted to go over the dates and times in your email with a few people here, and then wanted to have Bob review before I sent the response.

Unfortunately, I do not have information regarding February 28th and March 3rd. I do have some information for March 16th, the day of your visit. As I'm sure you can imagine with the legal issues I'm facing from your department, I was somewhat nervous/concerned about your visit. I was also hoping that one or more of our neighbors would create some odors so you could witness what was happening in our area. I had two people walking around monitoring the area for odors before and after your visit. One person, not employed by our facility, was monitoring the area from approximately 9 am to 4pm. They detected the usual daily traffic and odd odors around the area, but at no time did they detect odors from our facility or our neighbors. They also monitored wind speed and direction. For a good portion of the day there was little or no wind.

Prior to your visit, we informed everyone in the shop visitors would be here on March 16th. We asked if anyone would mind taking a late lunch that day. As I wasn't sure when you would review the system, my intent was to keep operating so anyone attending the meeting would not make the assumption we were trying to hide something by shutting the system down. The line was shut down shortly after you left at 1:30 pm and everyone in the shop took a long lunch.

The e-coat system was operating on March 22nd. The time given included our lunch period. The burn off ovens were operating the morning of March 22nd, cycle times are normally from approximately 8 to 10 am, and 12 to 2 pm. This varies a little depending on weather and rack availability. We only use the ovens with the afterburners installed. The afterburners do an excellent job, there are no odors generated from either oven.

I would welcome a review a review by you or an EGLE representative of the ovens in operation. I would also like EGLE to review an oven in operation that does not have an afterburner. They have been disconnected and have not been in operation for some time now. As suggested in our meeting, controls will be added to link the afterburner and main oven burner together. Both will shut off should either have a failure.

With the exception of the change made to the Valspar product, which generated a great deal of smoke, it's difficult to understand how we could operate the e-coat line, along with burn off ovens without afterburners for 21 years with no complaints. Considering the afterburners, the 65 foot stacks, the exhaust fans, and other changes, the system has never operated better. Until recently, there has not been a complaint in well over 2 years. Although I am not surprised by the complaints after February 24th, I am surprised at the speed and frequency.

We will continue to monitor the system carefully. Please let me know if you have any questions. Thank you again for your email

Sincerely,



Philip Oliver
President

CC: Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE , AQD
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Lansing, Michigan 48909-7760