



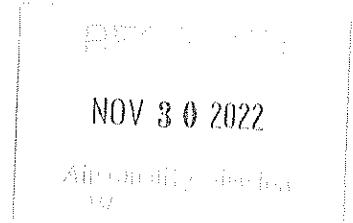
**INDUSTRIAL
METAL
COATING**

6070 Eighteen Mile Road Sterling Heights, MI 48314
(586) 977-1900

November 23, 2022

VIA EMAIL AND U.S. MAIL

Kaitlyn Leffert
EGLE – Air Quality Division
27700 Donald Court
Warren, Michigan 48092



RE: SRN: N5145, REVISED RESPONSE

Dear Kaitlyn Leffert:

This letter is a response to the letter received from EGLE on October 27, 2022.

Upon receiving your October 6th email regarding the complaint on October 4, 2022, IMC conducted an investigation on October 6th of the two possible sources that can emit odors from the operations. This includes the burn off ovens used to clean racks and the e-coat bake oven used to cure the e-coat. An odor investigation is completed based on the information you provided.

Our investigation found that the burn off ovens, including the afterburners, were operating normally. No offensive odor was detected from that operation. We also did not detect odors coming from the e-coat oven stacks during the time of our investigation. Initial upgrades to the oven exhaust fans and fresh air dampers have been installed. Additional changes to the exhaust stacks and fans are also in the process of being fabricated and installed. We plan to keep you advised on our progress.

With regard to the complaint received at 9:00 a.m. on October 4th.

As IMC has previously mentioned, we have an individual monitoring the area downwind from the facility during times of operation. Wind at the time of the complaint was out of the NW at 0-2 mph. IMC personnel was located downwind from the facility and noted there was very little to no wind, and not in the direction of the suspected complainant. No odor was detected during this time. The photographic evidence of smoke near ground level taken by IMC personnel on the morning of October 4th was also not in the direction of the suspected complainant. As with the previous complaints made by the complainant around 7 a.m. when the system was not operating, we believe the complaints are nothing but a form of harassment. These types of complaints are not helpful to the issues.

With regard to the department's inspection on October 4th at 10:20 a.m.

We agree that the wind was out of the NW at 2 mph or less. We have never been able to detect anything coming out of our stacks, or our neighbors' stacks at this wind speed. The emissions travel almost straight up into the atmosphere. It may be possible that whatever was being burned at or near ground level on the morning of October 4th was detected. At 10:20 a.m. on October 4th, the e-coat line was not operating. I have sent proof of this to our attorney Robert Davis to maintain for the record.

We also agree that a heat plume could have been coming out of the e-coat oven stacks. This will occur during a cool morning. We have never had a visible water vapor plume emitted from our burn off oven stacks. We believe this was mistaken for steam coming out of the pretreatment washer stack. With zero or little wind, the plume would have been travelling almost straight up as well.

We also question the odor intensity (3-distinct and objectionable odor). Over the last several years, we have focused close attention to the activities surrounding our facility. We have also walked around the facility with the Sterling Heights Building Inspector, the Sterling Heights Fire Department, and we now employ an individual monitoring the area downwind during our daily operations.

Considering our neighbors, the amount of activity around our facility, people outside walking, biking, and smoking, I would expect almost daily complaints if we were omitting offensive odors (3), that would almost cause a person to avoid them completely per the department's intensity scale. As mentioned, the operation performed by Industrial Metal Coating is consistent from day to day.

We will continue to monitor the area for offensive odors should they emit from Industrial Metal Coating or any of our neighbors. The changes made to our burn off ovens and bake oven have proven to be a benefit to our process. Additional changes to our bake oven exhaust fans and stacks are in the process of being added. We will keep you advised.

Please let me know if you have any questions.

Sincerely,

Philip Oliver

Philip Oliver
President

Cc: Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Jeff Rathbun, EGLE
Joyce Zhu, EGLE
Jennifer Rosa, Attorney General's Office

Attachment