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April 28, 2023

Mr. Robert Joseph
Environmental Engineer
Air Quality Division
EGLE / Warren District Office
27700 Donald Court
Warren, MI 48092-2793

via electronic mail & first class mail
josephr4@michigan.gov

Re: Violation Notice Response
SRN: N5145, Macomb County

Dear Mr. Joseph:

I represent Industrial Metal Coating. I worked with facility ownership, management and staff to prepare this response.

This responds to your Violation Notice dated April 21, 2023, attached hereto for your convenience.

Your NOV indicates, in part, staff detected nuisance odors in the "area" and then visited the facility and verified that the odors were originating from the "E-coat Curing Oven". The NOV asserts this process took place on April 19, 2023.

On page 2 of the NOV, the communication provides an opportunity to set forth facts why the EGLE observations or statements are not accurate. This response presents relevant facts accordingly. The following facts are true and can be further supported if requested:

1. On April 19, 2023, the facility shutdown at 3:38 and 13 seconds. This was a complete shutdown of all operations.
2. EGLE staff was on the sidewalk along the west side of Mound Road from 3:36 to 3:43. Mound, at the relevant location is an eight (8) lane road. There is no evidence that EGLE staff investigated upwind at any time prior to 3:36.
3. EGLE staff also walked into the subdivision (Vancouver Street) on the west side of Mount Road during that same time period.
4. During this time period (about 45 minutes), facility staff recorded the following on Mound Road:
 - 91 semis traveled north on Mound Road;
 - 97 semis traveled south on Mound Road;
 - 35 garbage trucks traveled south on Mound Road;

- 14 school buses traveled south on Mound Road;
- 1 fire truck traveled north on Mound Road;
- 17 school buses traveled east on 18 Mile Road across Mound Road;
- 14 semis traveled west on 18 Mile Road across Mound Road; and
- 2 fire trucks traveled east on 18 Mile Road.

5. EGLE staff came to the facility at 4:43 and 17 seconds. That is when EGLE staff opened the facility door. This is over one (1) hour after the facility was shutdown.

6. EGLE staff went to the burn-off ovens and then commented on the fact that the system was not operating. EGLE staff made that comment to Lena Suleyman who has worked at the facility for 25.5 years and is currently part of management.

7. EGLE staff then went to the bake oven of the E-coat system with Lena Suleyman.

8. Facility staff does not recall any odor comments by EGLE staff.

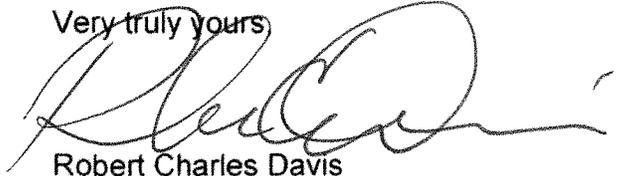
9. EGLE staff the left the facility indicating EGLE staff would send an e-mail. There is no evidence EGLE staff investigated upwind after leaving the facility.

The first conclusion is the odor allegations, based on the facts, are not true. Ironically, EGLE staff indicated the odor became stronger the longer the facility was shutdown. This is not logical.

Regardless, the facility is going to increase the stacks another ten (10) feet and install a more powerful exhaust fan at the oven entrance. The facility is working with SSM Industries. That service provider works with PPG in Shelby Township and is familiar with these issues. SSM's professional observations to date do not support a reportable odor issue from the facility.

The facility believes it remains in compliance and looks forward to a response.

Very truly yours,



Robert Charles Davis

RCD/tmj
enclosure
cc: Industrial Metal Coating