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May 3, 2023

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

*via electronic mail only*  
*joosephr4@michigan.gov*

**Re: Violation Notice dated March 21, 2023**  
**SRN: N5 145, Macomb County**

Dear Mr. Joseph:

I represent Industrial Metal Coating and Mr. Phillip Oliver.

The purpose of this communication is to provide a supplemental response to the referenced NOV. The key date for the NOV is the alleged odor issue on March 16, 2023. A copy of the relevant NOV is attached for your convenience. Mr. Oliver provided an initial response to the NOV dated March 22, 2023.

The EGLE investigator was at the facility on March 16, 2023 from about 4:45 p.m. to 5:15 p.m. Payroll records, as attached, show that operations were concluded by 4:00 p.m. Thus, the facility was not operating at 4:45 p.m. The facility concludes that any potential odor issue would have to be the result of the cure time for the last parts at issue. On March 16, 2023, the last parts to be subject to any cure time period were very small parts that would not generate the odor described. We have provided the worker time cards showing the facility shut down time for March 16, 2023.

The NOV allows the facility to argue that the observations or statements forming the basis of the NOV are not accurate. We are making that argument.

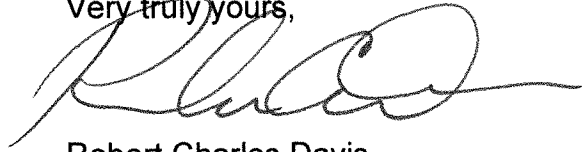
Regardless of the above, the facility is taking the following actions:

1. A contract is being negotiated to raise the stacks another ten (10) feet;
2. A contract is being negotiated to purchase and install a more powerful push fan system to move the exhaust up and through the stacks with increased force;
3. Facility Staff will now monitor the "cure" time period to analyze for odor issues both in and outside the facility; and

4. Facility staff is in contact with persons in the area and the staff is checking with those persons frequently about odors. The facility staff will continue to do so.

The facility challenges the observations made as inaccurate.

Very truly yours,

A handwritten signature in black ink, appearing to read 'RCD', with a long horizontal flourish extending to the right.

Robert Charles Davis

RCD/tmj  
enclosures  
cc: Industrial Metal Coating