



**INDUSTRIAL
METAL
COATING**

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VIA EMAIL ONLY

September 14, 2023

Robert Joseph
Senior Environmental Engineer
Air Quality Division

SRN: N5145 MACOMB COUNTY

Mr. Joseph,

This responds to your Notice of Violation dated September 7, 2023. The purpose of this communication is to timely provide a response and to set forth certain actions that will be undertaken. At the outset, please be advised that we object to your notice as not supported, harassment and not founded on the protection of human health or the environment.

We had a staff meeting on 08/28/2023 because we fully expected you to be on-site during the week of 8/28/23. At 9:53 am on 8/28/23, I sent a text out to my staff so everyone would not be surprised of your upcoming visit that week. During your visit, our representative Lena mentioned we expected you based on Jeff Patterson being at Progressive. Based on this conversation, I again informed everyone after you left that you would be returning again soon with a second complaint trying to convince us that it was not prompted by Mr. Patterson. Your return visit was expected, and you stated 4 times this is not prompted by Mr. Patterson. The agency behavior is very predictable. It is important to note the following: The facility never hears from you or your staff unless Mr. Patterson is at the Progressive offices.

With regard to smoke from the bake oven stacks in your video: This smoke is not normal and is a result of testing on supplied caps. The caps are not purchased by Industrial Metal Coating and are used to prevent threads from being coated.

We have been asked by the industry to test different caps for leaking, melting, or degradation as they transit through the cure oven. Our testing is usually 1.5 hours depending on number tested. There have been no complaints from period testing over the last couple of months. In addition to other process parameters, we have informed the customer that the caps cannot produce any odor or smoke while the parts are being cured. We have managed this testing process carefully.

I am surprised you did not mention the odor from the last batch of caps we received. We instantly detected the smoke and odor produced from the caps. The odor is distinct and noticeable and yet you did not mention it during your investigation. We took all measures necessary to address this issue. Again, unless Mr. Patterson is at the office, there are no issues.

You also mentioned 80 complaints from 2017 during your conversation with Lena. On many occasions we were lucky to photograph and document the actual sources of these odors. The odors are potent and at times engulf the area around our facility. When able, we continue to photograph and document potent odors as they occur around the area.

Industrial Metal Coating operated for 21 years with low output fans, stacks at minimal height, and no afterburners on our burn off ovens without one odor complaint. We have also operated on Saturdays, Sundays, and holidays for 28 years without one odor complaint being issued. Our system has not changed. Our customers have not changed. Our staff has been consistent.

I'm also curious about your comments regarding the odor inside the building "being the same as outside the building". These are two separate odors. The odor inside the building is a sweet smell emanating from the paint tank. This odor has been present inside the building since the tank was filled with paint in 1996, prior to the cure oven operating. Are you now stating that you detect the odor from the paint tank located inside the building across Mound Road? If so, we need to be advised on this ASAP.

Per the agreement, we disagree with your findings of an odor level that reached a 3 to 5. We could not possibly operate all these years with odors of that intensity without a complaint. With the exception of our afterburner, stack, fan, and process improvements, our operations have not changed since 1996.

Prior to your visit on August 30, we contracted work on changes to our roof to help improve our exhaust fan efficiency. These changes will take place within the next three months. We will advise you accordingly.

We are now in active discussions with PPG about a new product they have developed called "GEN 10". This product has a different solvent package and cure schedule. It has been in successful operation in Europe, and they are making changes to produce the product in the U.S. There is an additional cost involved along with changes to existing equipment. We will keep you advised on this.

We continue to monitor the area for odors around our facility. We also conduct random visits with our neighbors to ensure they are not being affected from our operation.

Finally, we are engaging expert Robert Kuklantz from All-4 Consulting to assess our operations onsite and to provide an expert opinion on odor. We will be inviting you and your counterparts to parts of that process. We intend to use this information to further assess a lawsuit against the state.

Regards,



Philip Oliver
President
Industrial Metal Coating

Cc: Annette Switzer, EGLE
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