



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

July 21, 2017

Mr. Phillip Oliver
Industrial Metal Coating
6070 Eighteen Mile Road
Sterling Heights, Michigan 48314

SRN N5145, Macomb County

Dear Mr. Oliver:

VIOLATION NOTICE

On June 20, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Industrial Metal Coating (IMC) located at 6070 Eighteen Mile Road, Sterling Heights, Michigan. The purpose of this inspection was to determine IMC's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; the conditions of Permit to Install (PTI) Nos. 106-94 and 25-16; and to investigate a recent complaint which we received on June 14, 2017, regarding foul odors attributed to IMC's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Burn-off ovens	PTI No. 25-16, Condition Nos. VI.3, VI.4, VI.5, and VI.6.	Records were not completed.
E-Coat line with drying oven	AQD Air Pollution Control Rule 901.	Strong odor was verified downwind of IMC.

During this inspection, Industrial Metal Coating was unable to produce the following records related to the operation of the burn-off ovens:

1. Records of the number of carts processed in each oven on a monthly basis and 12-month rolling time period basis as determined at the end of each calendar month. (Condition No. VI.3)
2. Records of visible emission readings (a minimum of once per calendar day) taken during operation of any oven. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, and status of visible emissions. Records of any action taken in response to readings of visible emissions (other than uncombined water vapor). (Condition Nos. VI.4 and VI.5)
3. Records of operating temperature of each oven taken at least once per batch cycle, including the date and time of each batch. (Condition No. VI.6)

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This is a violation of the recordkeeping conditions specified in Special Condition Nos. VI.3, VI.4, VI.5, and VI.7 of PTI No. 25-16.

On June 20, 2017, after the inspection, AQD staff observed a strong odor from the E-Coat line downwind and east of Industrial Metal Coating on Eighteen Mile Road, Sterling Heights. On two more occasions, on June 23 and June 30, 2017, AQD staff again observed a strong odor from the E-Coat line downwind of Industrial Metal Coating on Eighteen Mile Road.

In the professional judgment of AQD staff, the odors that were observed were of sufficient intensity, frequency and duration so as to constitute a violation of Air Pollution Control Rule 901.

AQD Administrative Rule 901 states, in part:

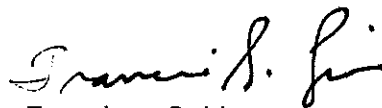
"A person shall not cause or permit the emission of an air contaminant in quantities that cause injurious effects to human health, property, or the unreasonable interference with the comfortable enjoyment of life and property."

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 11, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If IMC believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of IMC. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Francisco S. Lim
Senior Environmental Engineer
Air Quality Division
586-753-3742

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Joyce Zhu, DEQ
Mr. Scott Roach, IMC