

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY



LIESL EICHLER CLARK

SOUTHEAST MICHIGAN DISTRICT OFFICE

March 7, 2019

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

Dear Mr. Oliver:

SRN: N5145, Macomb County

VIOLATION NOTICE

On February 20, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Industrial Metal Coatings (IMC) located at 6070 Eighteen Mile Road, Sterling Heights, Michigan. The purpose of this inspection was to determine Industrial Metal Coatings' 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; and to investigate a recent complaint which we received on February 19, 2019 regarding foul odors attributed to Industrial Metal Coating's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
E-coat line with drying oven	AQD Air Pollution Control Rule 336.1901	Strong odor was verified downwind of IMC, across Mound Road, west of IMC.

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 Rule 901 of the administrative rules promulgated under Act 451.

On February 20, 2019, the AQD staff detected odors at the location of the plant as well as across Mound Road, west of IMC.

On November 27, 2018, AQD staff conducted an odor investigation and also detected odors on this date. At the time, AQD staff elected not to issue a violation notice as the duration of the odors was deemed not significant enough to warrant a violation. However, this reaffirms the ongoing odor issue at Industrial Metal Coatings.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 28, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

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violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Industrial Metal Coatings 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 violation cited above and for the cooperation that was extended to me during my inspection of Industrial Metal Coatings. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Joseph Forth

Environmental Quality Analyst

Air Quality Division

586-753-3749

cc: Ms. Mary Ann Dolehanty, DEQ

Dr. Eduardo Olaguer, DEQ

Mr. Christopher Ethridge, DEQ

Ms. Jenine Camilleri, DEQ

Ms. Joyce Zhu, DEQ