



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

May 9, 2019

Mr. Phil Oliver, President
Industrial Metal Coating
6070 18 Mile Road
Sterling Heights, MI 48314

SRN: N5145, Macomb County

Dear Mr. Oliver:

VIOLATION NOTICE

On April 10, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Industrial Metal Coating (IMC) located at 6070 18 Mile Road, Sterling Heights, Michigan. The purpose of this inspection was to determine Industrial Metal Coating'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; and to investigate a recent complaint which we received on April 10, 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 southeast (downwind) of IMC.

In the professional judgment of AQD staff, the odors that were observed on April 10, 2019, were of sufficient intensity, frequency and duration so as to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451. The AQD staff detected odors at the location of the complainant (downwind of facility).

Previously, on March 27, 2019, AQD staff conducted an odor observation and detected e-coat odor downwind of the facility. At the time, AQD staff deemed the intensity of the odor was not significant enough to warrant Rule 901 violation. The odor on this date was a level 2 intensity. Also, the duration for the presence of odor was only a few seconds. Despite the determination for no Rule 901 violation during this observation, the presence of odor shows that the odor issue is ongoing.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 30, 2019 (which coincides with 21 calendar

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days from the date of this letter). The written response should include: the dates the 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 EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Industrial Metal Coating 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 Coating. 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, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE