



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 14, 2022

VIA E-MAIL AND U.S. MAIL

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

SRN: N5145, Macomb County

Dear Phil Oliver:

VIOLATION NOTICE

On October 4, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an odor complaint investigation in the area surrounding Industrial Metal Coating located at 6070 18 Mile Road, Sterling Heights, Michigan. The purpose of this inspection was to investigate a recent complaint which we received on October 4, 2022 regarding odors attributed to Industrial Metal Coating's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
E-Coat Process	R 336.1901(b)	Distinct, objectionable odor associated with an e-coat process was detected downwind of Industrial Metal Coating.
Facility-Wide	Consent Judgment No. 2021-95-CE, Paragraph 5.2	IMC submitted the nuisance odor minimization plan past the deadline of 30 days specified in Consent Judgment No. 2021-95-CE.
Facility-Wide	Consent Judgment No. 2021-95-CE, Paragraph 5.6	IMC submitted the operational plan of the e-coat drying oven past the deadline of 30 days specified in Consent Judgment No. 2021-95-CE.

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(b) of the administrative rules promulgated under Act 451. This violation is also enforceable under Paragraph 5.7 of Consent Judgment No. 2021-95-CE. In addition, the facility was

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found to be in violation of notification and submittal requirements under Paragraphs 5.2 and 5.6 of Consent Judgement No, 2021-95-CE.

The AQD staff detected burnt plastic-like odors characteristic of the e-coat process while downwind of Industrial Metal Coating that were consistent with previous odors observed in the area associated with the e-coat process. The odors were not observed while upwind of the facility.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 4, 2022 (which coincides with 21 calendar 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 EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at 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. 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,



Kaitlyn Leffert
Environmental Quality Analyst
Air Quality Division
586-249-6505

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE
Jennifer Rosa, Attorney General's Office