



**INDUSTRIAL
METAL
COATING**

6070 Eighteen Mile Road Sterling Heights, MI 48314
(586) 977-1900

VIA EMAIL AND U.S. MAIL

*Received
10/20/22*

October 17, 2022

EGLE, AQD
Warren District
27700 Donald Court
Warren, Michigan 48092

RE: SRN: N5145, MACOMB COUNTY
RESPONSE TO NOTICE OF VIOLATION DATED OCTOBER 14, 2022

Kaitlyn Leffert:

As with our response to many previous complaints, I've attached video and photographic evidence of the odor source on the morning of 10/04/2022. Witnesses are available should the department wish to question someone.

The smoke and odor was being produced south of our facility and was detected South East of our facility. Distance of source was approximately 1000 feet of Industrial Metal Coating. The exact source for the odor and smoke is unknown to IMC.

The attached evidence is in addition to the 330 photos and numerous videos of smoke activity around our facility taken over the last several years. The photographic evidence on file is a fraction of the odor and smoke activities generated around our facility. For example, Industrial Metal Coating does not have photographic evidence of activities outlined by the Sterling Heights Fire Department.

Unlike Industrial Metal Coating's daily process, which are consistent in time and operation, the smoke and odor generating sources around the area are intermittent and random. Date, time, and activity are not repetitive. This is evident in long periods of time between complaints.

Industrial Metal Coating now has two individuals monitoring the area for offensive odors and smoke. I've attached examples of the records.

In regard to your investigation on the morning of October 4th, we noted winds at 0-2 mph for most of the morning and picking up by noon. We recorded wind out of the North or North West as evident in the video with smoke blowing towards the South East.

We did not detect offensive odors being emitted from the e-coat stacks during October 4th, however, based on our experience, we would not expect to detect odors from anyone in the area emitting from 65 foot stacks or taller with winds at 0 – 2 mph.

We are certain that the smoke/odors being generated on the morning of October 4th were at, or very close to ground level, and are the source of the complaint. The smoke and odor eventually reduced throughout the morning.

We will continue to monitor the area and record smoke and odors when detected, considering the data accumulated over the last several years, we expect these activities to continue around our facility
Sincerely,



Philip Oliver
President
Industrial Metal Coating

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