



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

March 22, 2023

VIA EMAIL

VIOLATION NOTICE REPLY SRN: N5145 MACOMB COUNTY

Robert Joseph
EGLE – Air Quality Division
27700 Donald Court
Warren, Michigan 48092

Dear Robert Joseph:

To preclude the need for derogatory emails from your department regarding me or my company, I am well aware there are two sources from our operation which have potential to create odors: the burn off ovens from the burning or cleaning of racks, and the e-coat bake oven as it cures parts in process. Nonetheless, I will state the e-coat system is not operating if in fact that is the case.

Since I'm not sure if you're aware of our history, we've operated burn off ovens without afterburners and a bake oven with minimum stack height, for twenty years without a single odor complaint. With the exception of burn off oven afterburners, bake oven stacks, and fans, our process has not changed since we began operating in 1996.

We began to document sources of odors around our facility when the complaints from Progressive started. Our initial response for our operation was to stop operating the burn off ovens as a potential source of odors. Afterburners have since been added to each oven which has eliminated all odors from the racks being cleaned. Per Ppg's recommendation we are drying off the parts of any excess liquid before they enter our e-coat system bake oven. All stacks from our bake oven have been increased to 65 feet above the ground, doubling their previous height. We've added more powerful fans to push the exhaust emissions higher into the atmosphere and installed fresh air dampers to bring fresh air into the exhaust stream.

Because we've been unfairly target by your department for operations causing odors near our facility, I've had individuals monitoring the area for over two years. We have a lot of experience with odors around our area and have conducted many tests/reviews of our processes and their emissions.

I have several issues with the complaint as well as your odor evaluation as it relates to the odor intensity scale.

With regard to the complaint itself, unless you have additional information, as with previous complaints, I do not believe this complaint was legitimate, but instead of one or two individuals trying to cause problems. I have eyewitness/video evidence of Jeff Patterson of Progressive driving by my facility, then turning around within a couple of hundred yards to drive by again with his head hanging out the window in 25 degree weather for no other reason than to see if he could smell anything from our operation. This is the same individual that has repeatedly called your department claiming he was smelling odors from the burn off ovens and e-coat system when they were not operating. This is a disturbed individual to say the least. The second individual is a former employee very familiar with this situation and has threatened to contact your department.

With regard to your independent investigation and the odor intensity of 3(distinct and objectionable odor), 4 (odor strong enough to attempt a person to avoid it completely). I have difficulty understanding how this could be true based on the following:

The burn off ovens and afterburners have been operating perfectly. We have not detected any emissions from either oven. No steam is emitted as claimed by one of your representatives during the last visit.

Our e-coat system has been operating normally, however, after a very busy end of 2022 and an unusually busy January, the auto industry has shut down a number of plants due to excess inventory. You may have heard this recently in the news. This has had a large effect on our business, and I've reluctantly had to lay off people for the first time since 2008. We've been very slow since around the 2nd week in February and many times have not operated full days or weeks.

The e-coat operation depends on people hanging parts on hooks one at a time. No robots or bulk processing. Your investigator was here between 4:45 and 5:15 pm. We do not have a dedicated second shift, nor enough people on second shift to operate the system. On March 16th, most of the first shift was out of the building by 3:30 pm and the remaining were out of the building by 4:00 pm. Payroll/time cards are on file.

Any odors created by the bake oven are a result of parts being cured. The more square footage being cured, the more emissions are created. The last parts processed on 03/16/2023 were approximately 2 x 2 inches in size, hardly enough to create any odorous emissions. Most were completed by the time of your investigation at 4:45 pm. I'm sending photos of the e-coat line during the time of your investigation on 03/16/2023 to Bob Davis for review. There were very few parts on the line, most of the racks had been removed.

From 8:00 am to 5:00 pm on 03/16/2023, we recorded 19 people walking down the side of 18 Mile Road North of our facility. Not one of them stopped, looked at our building, sniffed the air, accelerated, or changed path of direction. They were oblivious to our operation. This is also the case with the person that walks his dog four times a day in front of our building, the people that almost walk daily down 18 Mile Road and back for I assume exercise, and the people that daily smoke outside in front of our building. None avoided the area or paid any attention to our operation. In addition, recorded wind velocity out of the South at the time was 15 to 17 mph with gusts up to 31 mph in the area.

From our experience with emissions from our burn off ovens prior to afterburners, this wind velocity is too strong and variable to detect an odor from our operation for any length of time, let alone cause a person to avoid the area.

With regard to the bake oven stacks, we will be installing a more powerful fan with dampers on our first stack. The other stacks have been completed. I'm also investigating individual stack afterburners such as what we've placed on our burn off ovens. With the exception of the OEMs, I only know of one e-coat system in the tri state area that has an after burner related to their bake oven. They operate a system much larger than ours with many times the square footage being cured, two shifts, and are near a neighborhood.

During the mediation meeting last year, Bob Davis asked if the department would extend the courtesy to contact us when an odor complaint investigation was conducted. I had mentioned to Bob your department would call the general manager at Tower Automotive and asked to meet him on an odor investigation.

Unlike Tower, they only agreed to contact us just prior to leaving the area so that we could review the odors being generated at the location with your representative. To date this has not happened.

I find it strange we could operate this system for months or years at a time without a complaint. I also find it odd a complaint was issued yet we haven't been operating anywhere near our normal capacity. Past experience has shown that the department is not interested in photographic, videographic, written, or numerical proof, however, we have state unemployment records, timecards, and photographic proof for everything mentioned above.

We will continue to monitor our system, as well as the area around our facility.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip Oliver". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Philip Oliver
President