

P1226 Ziebart of Michigan Utica

Violation Response Part 3

From: Ed Russell <Erussell@ziebart.com>
Sent: Monday, October 2, 2023 10:03 AM
To: Bognar, Adam (EGLE) <BognarA1@michigan.gov>
Cc: Tom Bowler <tbowler@Ziebart.com>; Patricia Lipsky <plipsky@ziebart.com>; Thomas A. Wolfe Jr. <tawolfe.jr@ziebart.com>; MI83 Utica <MI83@Ziebart.com>
Subject: Re: Exhaust System Proposal for Ziebart Utica

Adam,

I met with a contractor last Wednesday to discuss modifying the rustproofing bay exhaust system with the intent of reducing the odors exuded from the exhaust stack. I informed him of the violation notice and our need to reduce the odor signature to satisfy the requirements of the notice. We also discussed the requirements of the permit to install with regard to the need for an unobstructed air flow through the exhaust. Lastly, we talked about your suggestions to raise the stack 1 ½ times the height of the building. On Friday he submitted a proposal that included the following:

1. Add 6' of 32" ducting vertically from the existing upblast fan. Adding 6' to the stack will raise the exhaust exit to approximately 1 ½ times the height of the building. His proposal specifically states that this "will leave the path of air completely unobstructed".
2. Cap the bottom of the existing interior duct work from the fan drop box (ceiling level) and add new duct work from the drop down the wall to a filter bank approximately 4' from the floor. He explained that the current interior duct work is drawing air from a ceiling vent as well as from a vent on the side wall. As the vapors in question are heavier than air, most of the vapor is sinking to the floor. When we open the garage door, these vapors escape into the outside environment. Capping the ceiling intake will allow the wall vent to draw more volume. Adding a filter bank to screen out solid particles will help reduce the amount of vapor exhausted to the outside.

Before I commit to having this work performed, I thought I would ask your opinion as to how effective these modifications would be to reduce the odor in question. I look forward to your response.

Regards,
Ed



Edmund C. Russell
Director, U.S. Retail Operations
Ziebart International Corporation

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From: Ed Russell <Erussell@ziebart.com>

Sent: Friday, September 22, 2023 1:44 PM

To: Bognar, Adam (EGLE) <BognarA1@michigan.gov>

Cc: Tom Bowler <tbowler@Ziebart.com>; Patricia Lipsky <plipsky@ziebart.com>; Switzer, Annette (EGLE) <SWITZERA2@michigan.gov>; Ethridge, Christopher (EGLE) <ETHRIDGEC@michigan.gov>; Myott, Brad (EGLE) <MYOTTB@michigan.gov>; Camilleri, Jenine (EGLE) <CamilleriJ@michigan.gov>; Zhu, Joyce (EGLE) <ZHUU@michigan.gov>; Thomas A. Wolfe Jr. <tawolfe.jr@ziebart.com>; MI83 Utica <MI83@Ziebart.com>

Subject: Ziebart Utica Violation Notice

Adam,

Thank you for meeting with Tom and I this morning to discuss the suspected odor emanating from our building. The following is a recap of our meeting:

1. While walking towards the Ziebart building along Crissman and River Vista Streets, we observed the odor from two houses away on Crissman St. We did not detect the odor at all on River Vista St.
2. We agreed that the odor in question is Stoddard Solvent (Mineral Spirits). Stoddard Solvents are used as a dispersion vehicle in our Formula Q undercoating product.
3. The odor is emanating from the building via an OSHA and EPA required exhaust fan mounted on the roof directly above the rustproofing area of our building as well from open doors.
4. We discussed that the prevailing winds in the Utica area are primarily from the west but change to the south for a 4–6-week period in August and September and how this may contribute of the problem.
5. You offered that you would consult with your supervisors and staff to determine a possible course of action that may provide a reasonable solution. Said solution may include increasing the height of the existing housing on the exhaust fan to help disseminate the vapors more thoroughly.
6. We agreed that Ziebart Corporation will await your suggestions before taking any further action.

As you requested, I have included photos of the exhaust fan housing mounted on our roof. Please note that the air flow is blowing straight up from the opening around the outside of the rain guard cap in the center of the housing and not blowing down as we had originally discussed.

In conclusion, we appreciate you taking the time to work with us to resolve this matter. We understand that this issue has not been resolved and look forward to working with you to find an equitable remedy.

Regards,
Ed



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Violation Response Part 1

From: Ed Russell <Erussell@ziebart.com>

Sent: Friday, September 8, 2023 4:13 PM

To: Bognar, Adam (EGLE) <BognarA1@michigan.gov>

Cc: Switzer, Annette (EGLE) <SWITZERA2@michigan.gov>; Ethridge, Christopher (EGLE) <ETHRIDGEC@michigan.gov>; Myott, Brad (EGLE) <MYOTTB@michigan.gov>; Camilleri, Jenine (EGLE) <CamilleriJ@michigan.gov>; Zhu, Joyce (EGLE) <ZHUJ@michigan.gov>; Tom Bowler <tbowler@Ziebart.com>; Patricia Lipsky <plipsky@ziebart.com>; Thomas A. Wolfe Jr. <tawolfe.jr@ziebart.com>; MI83 Utica <MI83@Ziebart.com>

Subject: Utica Ziebart Violation Notice

Adam,

Yesterday, the Ziebart of Michigan store located in Utica, Mi received a Violation Notice dated September 7, 2023 that via emailed. As this location is a corporately owned store, this email stands to acknowledge that Ziebart International Corporation is in receipt of the noticed. We ask that any further correspondence regarding this matter be directed to me, Tom Bowler or Patricia Lipsky. Email addresses for Tom and Patricia are listed in Cc.

The notice states that the location is in violation of Rule 336.1901 due to "A distinct and definite objectional odor (level 3)" being "detected downwind from the facility due to car detailing and rustproofing operations...". The notice further states that "AQD staff detected soapy odors..." on numerous occasions both inside and outside of our facility. As you and I discussed on the telephone this morning, being a detailing shop, we have numerous types of soap products that may be causing these "objectional odors". Also, as we discussed this morning, without knowing which of these products may be causing the problem, it will be difficult for us to address a course of action to rectify the problem. With this in mind, you and I agreed this morning to meet at the store on Friday, September 22, 2023, at 9:00am to see if we can determine the origin of the odor. Once we determine the origin, Ziebart International Corporation will be better equipped to initiate actions necessary to correct the cited violation and will submit another written response. Please note that if you or another EGLE staff member are available sooner than September 22nd, please let me know as Ziebart International Corporation would like to address this issue as soon as possible.

Thank you for your time and consideration in this matter. I look forward to working with you to come to an equitable resolution.

Regards,

Ed



Edmund C. Russell

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