

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



July 3, 2024

Philip Oliver, President Industrial Metal Coating 6070 18 Mile Road Sterling Heights, Michigan 48314

Dear Philip Oliver:

SRN: N5145, Macomb County

VIOLATION NOTICE

On June 26, 2024, 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; the conditions of Permit to Install (PTI) number 25-16B, and Consent Judgment 2021-95-CE.

During the investigation, staff observed the following:

| | Rule/Permit | |
|---------------------|----------------------------|---------------------------|
| Process Description | Condition Violated | Comments |
| FG-OVENS | PTI 25-16B, Section VI.2 | IMC has not installed a |
| | Monitoring/Recordkeeping | device to continuously |
| | | monitor and record the |
| | R 336.1910 | temperature in the |
| | | secondary chamber of |
| | Consent Judgment 2021-95- | each burn-off oven in FG- |
| | CE, Section 5.1 Compliance | OVENS at least once |
| | Requirements. | every 15 minutes. |

On June 26, 2024, AQD staff observed the operation of EU-OVEN1 and EU-OVEN2, and a device was not installed to continuously monitor and record the temperature of the secondary chambers of each oven at least once every 15 minutes.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

The cited Special Condition VI.2 of FG-OVENS in PTI number 25-16B is also enforceable as paragraph 5.1 of Consent Judgment 2021-95-CE.

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Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by July 24, 2024, (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 Robert Joseph at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092, or Josephr4@michigan.gov 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 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,

Robert Joseph
Robert Joseph

Senior Environmental Engineer

Air Quality Division

586-506-9564

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Jeff Rathbun, EGLE
Joyce Zhu, EGLE

Jennifer Matuja, Michigan Department of Attorney General