



**INDUSTRIAL
METAL
COATING**

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August 29, 2018

Joseph Forth
Environmental Quality Analyst
Air Quality Division
Department of Environmental Quality
27700 Donald Court
Warren, MI 48092-2793

Dear Mr. Forth:

RE: SRN: N5145, MACOMB COUNTY

SUBJECT: VIOLATION NOTICE

In response to your letter dated August 23, 2018, we have completed the following:

- We have ordered a calibration of the thermocouples on each burn off oven. We are relying on an outside company to do the calibration.
- The records of the times we are burning racks are being kept and sent to the DEQ weekly. All records are being kept for DEQ review.
- The burn-off ovens are being monitored and are operating properly. Any visible emissions are being recorded along with temperature and time.
- The rain caps have been removed and the exhaust stacks are unobstructed into ambient air. In addition, two of the exhaust stacks were raised vertically an additional five feet. We will raise the remaining stacks as soon as we receive material.

We are unable to speak about any odor that was detected on May 14, 2018. However, with regard to the similar odor that was detected on July 13, 2018, Industrial Metal Coating personnel presented photographic evidence of a large plume of smoke that was being produced nearby on July 13, 2018 to the DEQ. The exact origin of smoke is unknown but a strong odor was being produced. This odor has been detected a number of times before and since our meeting on August 7, 2018. This odor is significant and at times has encompassed the area around Eighteen Mile and Mound Road intersection.

On August 7, 2018, in addition to the odor, there was thick fog-like smoke, which moved south towards Eighteen Mile Road and Mound Road. Earlier this year, the Sterling Heights Fire Department was called by someone other than Industrial Metal Coating to investigate an odor. After an investigation, the Sterling Heights Fire Department determined that the odor was not coming from Industrial Metal Coating.

Due to the letter of violation from the DEQ, Industrial Metal Coating has since recorded additional photographic evidence of a smoke plume coming from an unknown source near the facility. Please understand, we do not have personnel stationed around the facility to photograph and document each and every time a company or individual may be burning or creating an odor near our facility. The photographic evidence such as the pictures presented to the DEQ on August 7, 2018 where someone was creating a large smoke plume that morning, are taken by chance/luck, and were presented in response to Industrial Metal Coating being targeted as a source of such emission.

Based on photographic evidence, and records which are most likely available at the Sterling Heights Fire Department we can say with certainty that on April 9th, April 16th, July 13th, and August 7th 2018, any odor or smoke was not being produced by Industrial Metal Coating. We are also certain, and are able to provide photographic evidence that activity producing odors are being conducted around the area. Again, we can only prove/provide a limited amount of information as we do not have personnel dedicated to monitor the burning of material in and around our facility.

With regard to burn-off ovens, we will continue to monitor the ovens and provide the required documents requested by the DEQ. We have increased our stack height and have plans to extend the building roof, which will enable us to increase the stack height considerably. We will be taking any measure available to prevent emitting odors as a result of the process.

Please let me know if you require anything additional.

Thank you,
INDUSTRIAL METAL COATING



Philip Oliver
President