



November 5, 2019

Joseph Forth
Environmental Quality Analyst/Air Quality Division
EGLE Department of Environment Great Lakes and Energy
27700 Donald Court
Warren, Michigan 48092-2793

RE: SRN: N5145 MACOMB COUNTY
SUBJECT: VIOLATION NOTICE

Mr. Forth:

As we have documented and set forth in earlier responses to the EGLE, we do not believe Industrial Metal Coating is the cause of the complaint. We have included a photo as an additional example of the cause for your review. Again, during the times when the odors are detected, you do not have to walk around searching and aggressively sniffing the air to detect the odors at issue.

To date, we have compiled 328 photos, 7 videos, extensive text messages, emails, and numerous eyewitness statements as to the source of the odors generated in and around our area. In addition, we have been alerted to two additional sources generating odors to the south and west of our facility. Although we do not know the exact source, we were lucky enough by chance to capture that source with one photo.

As I have also mentioned earlier, we do not have an individual employed to monitor the area throughout the day. The photos are taken by luck, I am sure only a fraction of the odor sources around the area are captured by this process.

To my knowledge, the complaints are being made from Progressive Insurance, located directly south and east of the sources of odors which are documented in our photos, texts, and emails. On multiple occasions, Industrial Metal Coating received complaints in writing from Progressive at the time odors were detected. Our E-Coat system was not in operation at those times making the complaints impossible.

In response to the time frame of the EGLE's notice of violation, I have enclosed a list of dates of the odors detected by our staff during the surrounding two months. Due to the EGLE's determination of finding fault with Industrial Metal Coating, we are doing our best to detect and photograph the time and source of odors around our area. We most certainly have missed some. We have detected odors being generated during the month of October as well, and we are expecting the next notice of violation to Industrial Metal Coating soon.

Lastly, in talking with other companies that have had similar odor issues, the EGLE has immediately contacted the facility and either met with representatives, or has reviewed information as to possible sources of the odors. For some reason, this has not been the practice with our facility. I am fully aware of the EGLE's determination and dedication to find fault with Industrial Metal Coating, and ignore photographs, videos, and written documentation on file. I assume this is the reason for the surreptitious nature in which the EGLE spends an hour trying to detect odors from our facility. I would however ask that in the future, representatives from the EGLE or person associated with their visit do not engage one of our employees in an argumentative or hostile manner. On September 25, 2019 at approximately 5:30 p.m., a person associated with the EGLE's visit confronted our forklift operator on our east parking lot about odors both outside as well as inside the building. When the forklift operator replied that he did not smell anything, and didn't know what they were talking about, the person responded by saying that he was "lying". After some back and forth argumentative dialogue, the employee contacted one of our supervisors. The supervisor along with the forklift operator and several others walked around the building and could not detect any odors.

We normally have just under a 100 people working in the facility and although we've had relatively low employee turnover during our twenty plus years in operation, we've had well over 1000 people work throughout the facility. We have yearly inspections from the Sterling Heights Fire Department, visits from the Sterling Heights Building Department during projects, over 300 customers, numerous contractors, employee family members through our facility and three visits from OSHA. Not once in twenty years has anyone made any statement or complaint regarding odors. In fact, OSHA was very complimentary on the construction of our system, our lighting, shop organization, and excellent safety record.

I would appreciate it if any individual from, or accompanying the EGLE act in a professional manner, and that they ask for supervision or management if they have any questions.

Thank you,
INDUSTRIAL METAL COATING



Philip Oliver
President
6070 Eighteen Mile Road
Sterling Heights, Michigan 48314

Attachments

cc: Jenine Camielleri