



STATE OF MICHIGAN  
 DEPARTMENT OF ENVIRONMENTAL QUALITY  
 SOUTHEAST MICHIGAN DISTRICT OFFICE



RICK SNYDER  
 GOVERNOR

DAN WYANT  
 DIRECTOR

July 14, 2015

Mr. Philip A. Oliver, President  
 Industrial Metal Coating  
 6070 Eighteen Mile Road  
 Sterling Heights, Michigan 48314

SRN: N5145, Macomb County

Dear Mr. Oliver:

**VIOLATION NOTICE**

On July 7, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Industrial Metal Coating (IMC) located at 6070 Eighteen Mile Road, Sterling Heights, Michigan. The purpose of this inspection was to determine IMC'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 administrative rules; the conditions of Permit to Install (PTI) No. 106-94, and to investigate recent complaints regarding chemical and burning metal odor concerning operations of the E-coat Line and burnoff ovens.

During the inspection the following violations were identified as follows:

Process Description/Equipment	Rule/Permit Condition Violated	Comments
E-Coat Line	Special Condition No. 19, Permit to Install No. 106-94	IMC did not keep records as specified in permit condition.
Burnoff Ovens	Administrative Rule 201	Burnoff ovens are operated without a permit.

Special Condition No. 19 of Permit to Install No. 106-94 specifies the following:

The applicant, in a manner acceptable to the District Supervisor, shall keep records for each calendar month of the following:

- A. The amount in gallons and the VOC content as received (minus water) of each coating used.
- B. The amount in gallons and the VOC content of each reducer used.
- C. Documentation showing the as-applied VOC content of all coatings used for the oven dried coating of miscellaneous metal parts.
- D. Calculations determining a 12-month rolling average VOC emission rate from the E-Coat paint line.

I verified that IMC did not have the above records available during the inspection. Please note that a similar violation was issued by the AQD to Industrial Metal Coating on May 24, 2006 and September 8, 2009.

IMC also installed and is operating burnoff ovens without first obtaining a permit to install. AQD administrative Rule 201 states in part:

"A person shall not install any process or process equipment, including control equipment pertaining thereto, which may emit an air contaminant, unless a permit to install which authorizes such action is issued by the department."

Recent complaints from a business establishment nearby regarding a strong burning metal odor from IMC could be due to the improper operation of the burnoff ovens. Although I have not yet verified a strong odor from your burnoff ovens, based on my professional experience, I have no doubt that burnoff ovens, especially improperly operated ovens, could be a source of a strong objectionable odor.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 4, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. Please submit the records, including emissions records required by PTI No. 106-94. A permit to install application is available at the AQD website at:

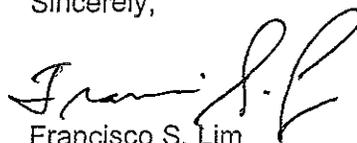
[http://www.deq.state.mi.us/aps/nsr\\_information.shtml](http://www.deq.state.mi.us/aps/nsr_information.shtml)

If IMC 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.

Additionally, your permit does not contain hazardous air pollutants (HAPs) limits. Although previous emission estimates demonstrate you may not be a major source for HAPs, we advise that you also modify PTI No. 106-94 to include a HAPs emission limit to limit your potential to emit for HAPs.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, or questions regarding limiting potential to emit, please contact me at the number listed below.

Sincerely,



Francisco S. Lim  
Environmental Engineer  
Air Quality Division  
586-753-3742

FL/DC

cc: Mr. Scott Roach, Industrial Metal Coating  
Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Chris Ethridge, DEQ