



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

October 24, 2017

Mr. Phillip Oliver  
Industrial Metal Coating  
6070 Eighteen Mile Road  
Sterling Heights, Michigan 48314

SRN N5145, Macomb County

Dear Mr. Oliver:

### **VIOLATION NOTICE**

On August 4, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) received a response from Industrial Metal Coating (IMC) located at 6070 Eighteen Mile Road, Sterling Heights, to a Notice of Violation (NOV) issued by the AQD. The NOV issued on July 21, 2017 was for violations of permit conditions of Permit-to-Install No. 25-16 and Michigan Air Control Rule 901.

IMC's response consists of a compliance plan that includes ordering new stacks for the E-Coat bake oven and installation of the new stacks within 30-45 days. A copy of the NOV and IMC's response is attached for your reference.

On October 5, 2017 AQD staff conducted an inspection of Industrial Metal Coating and verified that the new stacks have not yet been installed. Additionally, AQD has once again received several complaints regarding foul odors attributed to IMC's operations, particularly whenever the wind is coming from the North, Northeast and Northwest.

On October 5, 2017, after the inspection, AQD staff observed a strong odor from the E-Coat line downwind of Industrial Metal Coating. On October 10, 2017 staff also observed a strong odor from the E-Coat line at the property of Progressive Insurance.

In the professional judgment of AQD staff, the odors that were observed were of sufficient intensity, frequency and duration so as to constitute a violation of Air Pollution Control Rule 901.

AQD Administrative Rule 901 states, in part:

"A person shall not cause or permit the emission of an air contaminant in quantities that cause injurious effects to human health, property, or the unreasonable interference with the comfortable enjoyment of life and property."

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 14, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary

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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.

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.

As of the date of this letter, because of the ongoing odor complaints that has been verified and failure to implement IMC's compliance plan included in the August 4, 2017 response letter, the NOV issued July 7, 2017 remains unresolved.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of IMC. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

cc/via e-mail: Mr. Scott Roach, IMC  
Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Joyce Zhu, DEQ