



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREETHER  
DIRECTOR

August 23, 2018

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

SRN: N5145, Macomb County

Dear Mr. Oliver:

**VIOLATION NOTICE**

On May 3, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Industrial Metal Coatings Inc. (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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 25-16. Also, on May 14, 2018 and July 13, 2018 staff conducted odor observations to investigate several complaints regarding foul odors attributed to the burn-off oven operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
E-coat line with drying oven	AQD Air Pollution Control Rule 901	On date, AQD staff verified strong odor downwind of IMC.
Burn-Off Ovens	PTI No. 25-16 Special Condition II.1	The permittee shall not burn off more than one cart of paint racks at a time in each oven and no more than 1,920 carts per 12-month rolling time period. The facility was unable to produce records of how many racks they have processed.
Burn-Off Ovens	PTI No. 25-16 Special Condition III.3	The permittee shall calibrate the thermocouples associated with the primary chamber of each oven at least once per calendar year. The facility was unable to prove that they have been calibrating the thermocouples.
Burn-Off Ovens	PTI No. 25-16 Special Condition VI.1	The permittee shall complete all required records in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified. The facility did not have all required records completed.

Burn-Off Ovens	PTI No. 25-16 Special Condition VI.3	The permittee shall keep records of the number of carts processed in each oven, on a monthly basis and 12-month rolling time period basis as determined at the end of each calendar month. The facility was not able to produce these records.
Burn-Off Ovens	PTI No. 25-16 Special Condition VI.4	The permittee shall monitor the burn-off ovens to verify that they are operating properly, by taking visible emission readings a minimum of once per calendar day during operation of any oven. If any visible emissions are observed, the permittee shall immediately inspect the oven, verify the type of coating that is being burned off the racks and perform any required maintenance on the oven. The permittee shall keep records of any action taken in response to readings of visible emissions. The facility was unable to provide records of performing visible emissions readings.
Burn-Off Ovens	PTI No. 25-16 Special Condition VI.5	The permittee shall keep records of all visible emission readings for FGOVENS. At a minimum, records shall include the date, time, name of observer, whether the reader is certified, and status of visible emissions. The facility was not able to produce these records.
Burn-Off Ovens	PTI No. 25-16 Special Condition VI. 6	The permittee shall monitor and record the operating temperature of each oven in FGOVENS at least once per batch cycle. The permittee shall keep records of the operating temperature for each oven for each batch cycle. The facility was not able to produce these records.
Burn-Off Ovens	PTI No. 25-16 Special Condition VIII	The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air. The ovens had fugitive emissions leaking out of rusted seams of oven #1.

During this inspection, Industrial Metal Coatings was unable to produce the aforementioned records. In addition, it was noted that burn-off oven processes were emitting smoke from seams in the walls, thus not venting directly upwards and were then obstructed by the roof over the ovens. These are violations of the recordkeeping and emission limitations specified in Special

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Conditions II.1, III.3, VI.1, VI.3, VI.4, VI.5, VI. 6, and VIII of PTI number 25-16. The conditions of PTI number 25-16 require maintenance of records, which shall be made available for review upon request by the AQD staff.

An odor observation was performed by AQD staff on May 14, 2018. In the professional judgment of AQD staff, the odors that were observed were of sufficient intensity, frequency and duration to constitute a violation of Rule 901. The AQD staff detected odors downwind, north of the facility across 18 Mile Road.

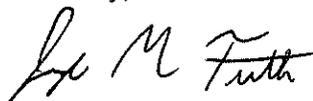
An additional odor observation was performed by AQD staff on July 13, 2018. In the professional judgment of AQD staff, the odors that were observed were of sufficient intensity, frequency and duration to constitute a violation of Rule 901. The AQD staff detected odors downwind, east of the facility.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 13, 2018 (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.

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.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Industrial Metal Coatings Inc.. 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,



Joseph Forth  
Environmental Quality Analyst  
Air Quality Division  
586-753-3749

cc/via e-mail: Mr. Scott Roach, Industrial Metal Coating  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Joyce Zhu, DEQ