

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

B548628076

FACILITY: Unicote Corporation		SRN / ID: B5486
LOCATION: 24201 GIBSON DR, WARREN		DISTRICT: Southeast Michigan
CITY: WARREN		COUNTY: MACOMB
CONTACT: Fred Terry, Operations Manager		ACTIVITY DATE: 12/18/2014
STAFF: Erik Gurshaw	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2015 FCE Inspection		
RESOLVED COMPLAINTS:		

SRN: B5486

COMPANY: Unicote Corporation

COMPANY ADDRESS: 24201 Gibson Dr. Warren, MI

PURPOSE OF INSPECTION: Targeted

CONTACT PERSON: Mr. Fred Terry, Operations Manager

COMPANY PHONE NUMBER: 586-754-1400

On December 18, 2014, AQD staff, Erik Gurshaw, conducted a targeted, unannounced inspection at Unicote Corporation located at 24201 Gibson Dr. in Warren, Michigan. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Rules; and Permit-To-Install (PTI) Number 45-99 for two paint booths, a bake oven, and a burnoff oven. Unicote starting operating at the location in December 2012 and assumed responsibility for PTI #45-99 which was previously issued to Kencoat, Inc.

Upon arriving at the facility, AQD staff introduced themselves and stated the purpose of the visit to Mr. Fred Terry, Operations Manager (Ph: 586-619-7030; E-mail: [fterry@unicotecorporation.com](mailto:fterry@unicotecorporation.com); Fax: 586-619-9627). Mr. Terry indicated that Unicote Corporation operates from 7:30 AM until 3:30 PM Monday through Friday and employs 7 people. Unicote removes oil and applies a rust inhibitor sealant to automotive parts for Tier 1 automotive suppliers. Mr. Terry assisted AQD staff during the inspection.

Mr. Terry indicated that the two paint booths permitted under PTI #45-99 are in the process of being dismantled and that the rooftop burnoff oven in PTI #45-99 has not been used since Unicote started operating at the location. The bake off oven used by Kencoat to cure paint to metal parts is being used by Unicote to dry the metal parts it processes. As previously mentioned, Unicote removes oil and applies a rust inhibitor sealant to automotive parts. All of the parts the company receives undergo the oil removal process, but the rust inhibitor sealant is only applied to select parts per customer specifications. Equipment at the company includes the following: an automated parts wash/rinse line; a 300,000 Btu/hour natural gas fired bake off oven; and a 2.5 MMBtu/hour "Raypak Model E4001" natural gas fired boiler. The bake off oven is permitted under PTI #45-99, but it would be exempt under State of Michigan Air Pollution Control Rule 282(b)(i) if it was not included in the PTI. The company's boiler is also exempt from PTI requirements pursuant Rule 282(b)(i). The company is going to request that PTI #45-99 be voided once the paint booths have been fully dismantled.

Oil is removed from metal automotive parts via the following process: Metal parts are manually loaded onto an automated conveyor line in metal baskets. After being loaded onto the conveyor line, the parts are sent through a spray wash line at 130 to 140 degrees Fahrenheit for 2 to 3 minutes. Anticor PFG-3 manufactured by Torch Surface Technologies is mixed with water to create a 3% to 5% Anticor/water solution in the spray wash line. Anticor PFG-3 is a detergent that aids in the removal of oil from the metal parts. The MSDS sheet for Anticor PFG-3 indicated that it contains no VOCs or HAPs. After the spray wash line phase, the parts are sent through a series of three water rinse lines. Parts are rinsed with water at ambient temperatures in the first two water rinse lines. In the third rinse line, the parts are rinsed with water at approximately 100 degrees Fahrenheit. Each of the three water rinse phases lasts approximately one minute in duration. From the water rinse lines, some of the parts are sent through a

rust preventative/inhibitor rinse line where a rust preventative sealant is applied to them. After either being rinsed or going through the rust inhibitor line, the parts are conveyed to a drying oven where they are dried at 125 degrees Fahrenheit for 15 to 30 minutes.

Anticor PF-201 is the rust inhibitor sealant used in the rust inhibitor phase of the process. Anticor PF-201 contains 5%, by weight, VOC and contains no HAPs. All of the oil removal/rust inhibitor applicator lines exhaust to the general plant environment. Mr. Terry indicated that approximately 5 gallons of Anticor PF-201 rust inhibitor is used by the company per day. AQD staff informed Mr. Terry that the rust inhibitor application line would be exempt from PTI requirements pursuant Rule 290 based on the usage rate of Anticor PF-201 in this line and the low percentage of VOC in the sealant product. AQD staff told Mr. Terry, however, that the company would need to maintain usage records to demonstrate that the rust inhibitor line meets the Rule 290 exemption for VOC emissions. Mr. Terry provided AQD staff with usage records for November 2014 and December 2014. The records indicate that 95 gallons of Anticor PF-201 was used in November 2014 and that 85 gallons of Anticor PF-201 was used from December 1, 2014, through December 17, 2014. Based on the VOC content and density of the product (8.67 lbs/gallon), this would equate to 41 lbs of VOC emissions for November 2014 and 36.8 lbs of VOC emissions from December 1, 2014, through December 17, 2014. This is well below the 1000 lb VOC emission limit established in Rule 290(a)(i). Mr. Terry was instructed to continue maintaining usage records for Anticor PF-201 to demonstrate that emissions from it meet the Rule 290 exemption.

Based on this inspection, Unicote is in-compliance with all applicable air quality rules and regulations. The following records are attached to this report: the MSDS sheet for Anticor PF-201; 5 stage parts washer processing log records from November 5, 2015 through December 17, 2014; and an October 7, 2014, waste hauling invoice from Usher Oil Company. Usher Oil hauls away waste water from the company every 3 to 4 months. Mr. Terry indicated that Mr. Thomas Khury, President of the company, is going to request that PTI #45-99 be voided since the equipment which needed to be permitted is no longer used by the company.

NAME Erik Duvshaw DATE 12/22/14 SUPERVISOR CTE