

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

B548637989

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: 12/08/2016
STAFF: Kerry Kelly	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FCE: Unicote appears to be in compliance with applicable air quality regulations.		
RESOLVED COMPLAINTS:		

On December 8, 2016, Tyler Salamasick and I (Kerry Kelly) 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 Gibson Road location in December 2012 and assumed responsibility for PTI #45-99 which was previously issued to Kencoat, Inc.

Unicote operates a metal parts washing, rust inhibitor sealant application, and drying process in southern Macomb County. The facility is an area source of hazardous air pollutants (HAP's) and minor source for criteria pollutants. The area surrounding Unicote is populated primarily with industrial/commercial properties. The nearest residential property is approximately 0.15 miles east-northeast of Unicote.

### INSPECTION

Upon entering the office at Unicote, Tyler and I introduced ourselves, showed our photo credentials, and stated the purpose of our visit to Mr. Fred Terry, Operations Manager. According to Mr. Terry, Unicote Corporation operates from 7:00 AM until 3:30 PM Monday through Friday and employs approximately 7 – 8 people. Mr. Terry assisted AQD staff during the inspection.

The two paint booths and burnoff oven, permitted under PTI #45-99, were removed from the location according to Mr. Terry. During the facility walk through Mr. Terry showed Tyler and I what appeared to be the entire facility, pointing out the locations where the paint booths and burn off oven used to be. I did not see any paint booths or burn-off ovens at the facility. While walking through the building I inspected the ceiling. Above the area where the paint booths had been located I observed, protruding several feet down from the ceiling, the remains of the connections between the paint booths' ventilation and stacks.

As previously mentioned, Unicote washes and applies a rust inhibitor sealant to automotive parts. All of the parts the company receives undergo the washing process; 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 drying oven, a 2.07 MMBtu/hour natural gas fired boiler, 4 natural gas-fired space heaters, and a 175,000 Btu/hour natural gas-fired boiler.

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 heated to 120 to 140 degrees Fahrenheit. 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. Mr. Terry provided the MSDS for Anticor PFG-3

(Attachment 1). The MSDS 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. The wash and rinse line appears to be exempt from the requirement to obtain a permit to install per R336.1281 (e) because the parts cannot become an air contaminant, no volatile organic compounds that have a vapor pressure greater than 0.1 millimeter of mercury at standard conditions are used in the process, and no oil or solid fuel is burned. I inspected the 2.07 MMBtu/hour boiler is used to heat the water for the wash/rinse line and took a picture of the nameplate (Attachment 2). This boiler appears to be exempt from the requirement to obtain a PTI pursuant to R 336.1282(b)(i) as it is fuel burning equipment used for heating service water. Compliance with the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters and for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR 63 Subpart JJJJJ) was not evaluated because the DEQ-AQD has not accepted delegation to enforce these regulations at area sources of HAP's. It appears this boiler is not subject to the New Source Performance Standards for steam generating units (40 CFR 60 Subparts D, Da, Db, and Dc) because the rated heat input capacity (2.07 MMBtu/hr) is less than 10 MMBtu/hr.

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. Anticor PF-201 is the rust inhibitor sealant used in the rust inhibitor phase of the process. Mr. Terry provided a copy of the MSDS for Anticor PF-201(Attachment 3). Anticor PF-201 contains 5% by weight of VOC and contains no HAPs according to the MSDS. The wash, rinse, and rust inhibitor lines exhaust to the ambient air. Mr. Terry provided records of Anticor PF- 201 rust inhibitor used each month and the VOC emissions for December 2015 through November 2016 (Attachment 4). The highest VOC emissions reported for one month was 58.59 lbs. It appears the rust inhibitor line is exempt from the requirement in R 336.1201 to obtain a permit to install because the uncontrolled VOC emissions from the process are less than 1,000 lbs/month according to the records provided. Mr. Terry also indicated Unicote will be getting a new rust inhibitor with no VOC's (Anti-Cor PF-201 (Non VOC 12/16)) the week of December 11, 2016 and submitted the SDS for the non VOC Anti-Cor PF-201 (attachment 5).

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. The drying oven is permitted under PTI #45-99 (EU BAKEOVEN), but appears to be exempt from the requirement to obtain a permit to install under R 336.1281 (e) because it used to to dry materials that themselves cannot become an air contaminant.

Four 90,000 Btu/hour natural gas-fired space heaters and the 175,000 Btu/hour boiler are used for heating the facility. I inspected the space heaters and boiler. Mr. Terry photographed the nameplate (Attachment 6). The specs page from the boiler manual (Attachment 7) was sent to me via email by Mr. Terry. These space heaters and boilers appear to be exempt from the requirement to obtain a permit to install because they are natural gas- fired fuel burning equipment used for space heating.

## **CONCLUSION**

Based on this inspection and statements from Mr. Terry and Mr. Thomas Kury, President, Unicote, it appears all of the equipment in PTI 45-99 has either been removed (EU PAINTBOOTH1, EU PAINTBOOTH2, and EU BURNOFFOVEN) or is exempt from the requirement to obtain a permit to install (EU BAKEOVEN). As a result, Mr. Kury requested AQD permit section void PTI 45-99.

Unicote appears, based on this inspection, to be in compliance with applicable State and Federal air quality rules and regulations.

NAME K. Kelly

DATE 12/28/16

SUPERVISOR gjc

