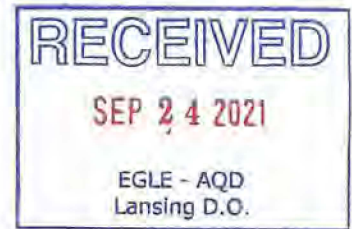


Mr. Robert Byrnes  
September 20, 2021

## UNIVERSAL COATING, INC.

5204 Energy Dr, Flint, MI 48505  
Phone: (810) 785-7555 Fax: (810) 785-7776  
Web site: www.universalcoating.com



Mr. Robert Byrnes  
EGLE - Air Quality Division Constitution Hall, First Floor South 525 W.  
Allegan Street  
Lansing, MI 48933

**RE: Response to August 30, 2021 Violation Notice Universal Coating, Inc. (SRN: N7256)**

Dear Mr. Byrnes:

September 20, 2021

Universal Coating, Inc. ("Universal Coating") is in receipt of a Violation Notice (VN) issued by the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), regarding the facility's burn-off oven, identified as EU-BURNOFF, in Renewable Operating Permit (ROP) No. MI-ROP-N7256-2017a. Specifically, the VN, dated August 30, 2021, alleges that an EGLE staff member visually observed and photographed visual emissions from the stack area of the Burn-Off on August 13, 2021. The VN also states that Rule 336.1910/SC IV.2 AND IV.3 were in violation.

Upon receiving this VN, Universal Coating immediately initiated an investigation and discovered that the alleged emission violation that occurred was due to the load size being burned off with too short of a burn time and had nothing to do with the sited Rules.

For the last 18 years the burn sequence has worked without any visual emission, since we are growing we are having larger load and coating sizes. The sequence of operation is to get the mass to a temperature of 800F and the afterburner to 1400F, the burn timer then starts and runs for 15 minutes, once the timer shuts off all burners shut off as well.

We contacted the vendor of the burn-off unit and were advised to start adding 10 minutes to the burn timer until we were able to shut down without any emission. We did a 25, 35, 45 and 60 minute trial of load and coating sizes to see how long it would take to burn off without any emission (smoke). During this investigation our last load ran with a 60 minute timer was similar to the load ran on August 13<sup>th</sup>, and found we didn't have any emission when the unit shut down. To make it simpler for all operators all loads will have the timer set for 60 minutes regardless of the load size and coating left on the tooling.

Universal Coating has implemented several corrective procedures, as listed below:

- Ensuring the burn timer is set for 60 minutes to ensure the burn is complete.
- Implementation of visually validating there isn't any emission (smoke) coming from the stack after the unit shuts down.
- If smoke is present the unit is to be restarted and ran for an additional 15 minutes

Mr. Robert Bymes  
September 20,2021

Universal Coating takes these events very seriously and has put forth great effort to mitigate these deviations and to ultimately achieve greater compliance.

If there are questions regarding this response to VN, please contact Ms. Julie Taylor at (810) 785-7555 or [environmental@universalcoating.com](mailto:environmental@universalcoating.com).

Sincerely,



Tim Johnson  
General Manager  
Universal Coating Inc.

Enclosure

cc: Mr. Brad Myott, EGLE - AQD  
Ms. Julie Taylor, Universal Coating, Inc.

# Burn Off Oven Chart

DOCUMENT NO: Oven Chart Log.xlsx  
REVISION: 02  
ISSUE DATE: 09/03/2020

MI-ROP-N. 256-2017a

Permit requirements are on the backside of this log

Ensure Afterburner is maintained at 1400 F for duration of Main Chamber burn

FILL IN LOG AS SAMPLE SHOWS BELOW AND WRITE CORROLATING NUMBER OR DATE ON OVEN CHART. RECORD ANY PROBLEMS AND CORRECTION ON BACK OF LOG.

Chart #	Date	What is being burned off?	Did after burner reach minimum 1400°F	Time In	Operator	Time Out	Operator
Sample	02/12/06	Tooling & UC # 123456	Yes	8:00	RH	10:00	DT
1	7-1	Tool	yes	7:15	HJ	10:45	HJ
2	7-2	"	yes	7:00	HJ	10:15	HJ
3	7-3	"	yes	9:30	HJ	14:15	HJ
4	8	"	yes	6:50	HJ	8:30	HJ
5	7-8	Tools	yes	12:15	MAH	17:45	HJ
6	9	"	yes	15:27	HJ	18:30	HJ
7	7-10	"	yes	8:27	MAH	10:30	HJ
8	11	"	yes	10:28	HJ	13:00	HJ
9	7-12	Tools	Yes	8:24	MAH	11:15	HJ
10	7-13	Tools	Yes	13:19	MAH	15:10	HJ
11	7-14	"	yes	06:30	HJ	10:17	HJ
12	7-14	Tools	Yes	11:06	MAH	13:00	MAH
13	7-15	"	yes	06:25	HJ	09:45	HJ
14	7-15	"	yes	06:20	HJ	08:20	HJ
15	7-16	"	yes	10:10	HJ	12:40	MAH
16	7-18	"	yes	7:00	HJ	9:00	HJ
17							
18							
19							
20							







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MI-ROP-N7256-2017a

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Sample	02/12/06	Tooling & UC # 123456	Yes	8:00	RH	10:00	DT
1	8-4-21	Tooling	Yes	6:54	MAH	11:30	MAH
2	8-4-21	"	Yes	11:31	MAH	5:50	MAH
3	8-5-21	"	Yes	6:00	MAH	11:00	MAH
4	8-5-21	"	Yes	13:19	MAH	15:30	HJ
5	8-6	"	Yes	6:35	HJ	8:30	
6	8-7	Tooling	Yes	8:34	MAH	11:00	HJ
7	8-7	"	Yes	6:15	HS	10:00	
8	8-10	"	Yes	6:00	HJ	09:45	
9	8-10	"	Yes	9:58	MAH	13:19	HJ
<del>10</del>	<del>8-11</del>	<del>" "</del>	<del>Yes</del>	<del>6:25</del>	<del>HJ</del>	<del>11:50</del>	<del>HJ</del>
10	8-12	" "	Yes	07:00	HJ	11:52	
11	8-13	"	Yes	07:00	HJ	12:04	
12	8-17	"	Yes	07:00	HJ	11:30	
13	8-15	"	Yes	10:15	HS	13:30	
14	8-14	"	Yes	07:45	HJ	9:45	HJ
15							
16							
17							
18							
19							
20							







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MI-ROP-N7256-2017a

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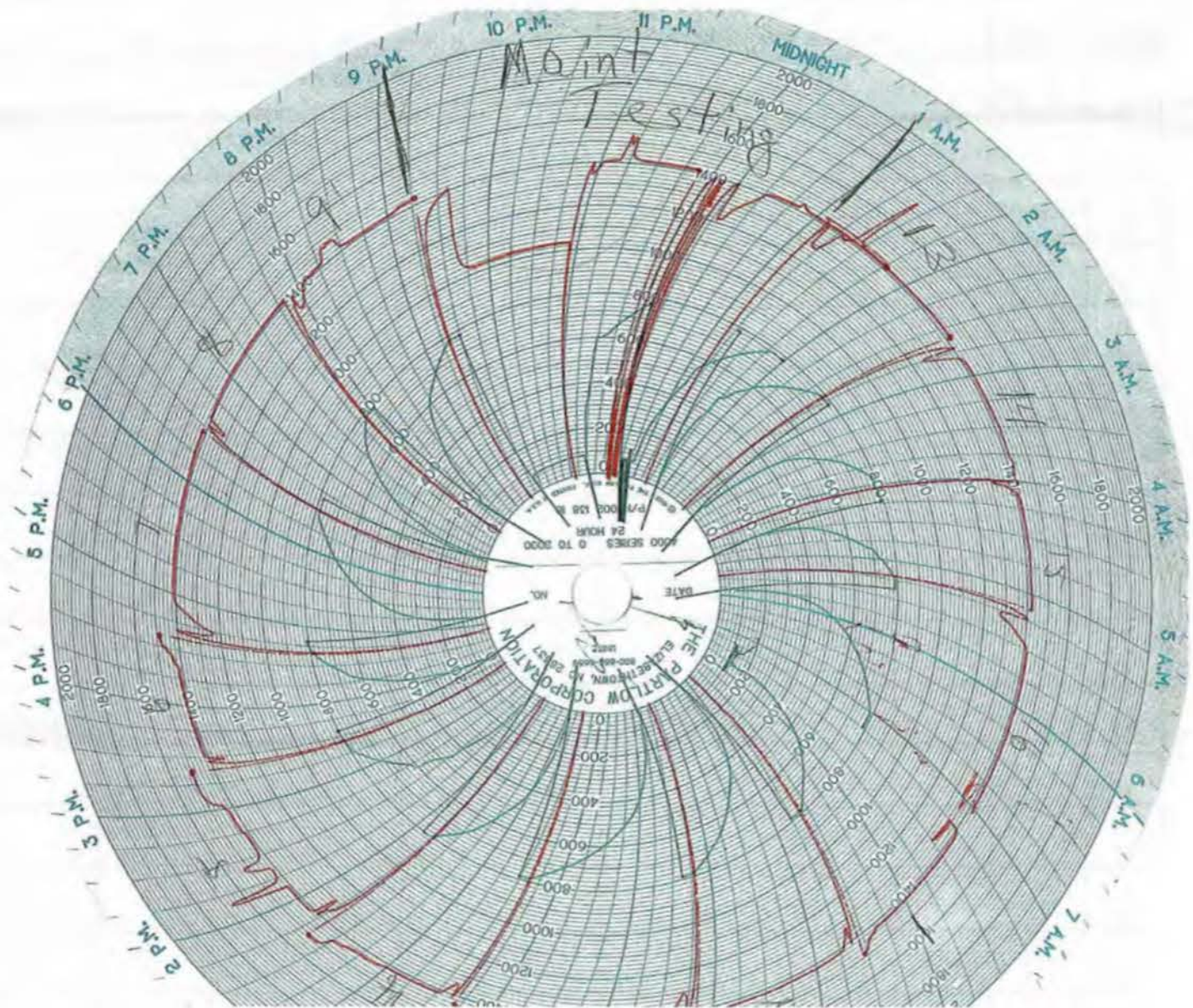
Ensure Afterburner is maintained at 1400 F for duration of Main Chamber burn

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Sample	02/12/06	Tooling & UC # 123456	Yes	8:00	RH	10:00	DT
1	8-12	Tooling	Yes	7:10	HJ	10:10	
2	19	" "	Yes	06:15	HJ	09:30	
3	8-20	MAH Tooling	Yes	9:20	MAH	13:30	HJ
4	21	" "	Yes	4:30	HJ	14:03	HJ
5	23	" "	Yes	11:06	MAH	14:22	
6	24	" "	Yes	06:25	HJ	10:45	
7	25	" "	Yes	06:00	HJ	9:00	
8	25	" "	Yes	09:20	HJ	10:30	HJ
9	27	" "	Yes	14:00	MAH	17:00	
10	28	" "	Yes	06:30	HJ	11:30	
11	29	" "	Yes	10:05	HJ	13:00	
10	MAINT	" "	NO				
11	MAINT	Re-2000 #10N of up to temp	Yes				
12							
13							
14	9-1	Tooling	Yes	6:15	HJ	9:05	MAH
15	9-1	" "	Yes	9:12	MAH	11:20	HJ
16	9-2	" "	Yes	06:30	HJ	10:30	
17							
18							
19							
20							

left off on 8/30







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Sample	02/12/06	Tooling & UC # 123456	Yes	8:00	RH	10:00	DT
1	9-7	Tooling	Yes	1040	HJ	1430	HJ
2	7	"	Yes	0635	HJ	1300	HJ
3	9-8	Tooling	Yes	7:13	MAH	1230	MAH
4	9-8	"	Yes	1237	MAH	1537	HJ
5	9	"	Yes	0640	HJ	1000	HJ
6	9-9	"	Yes	1443	HJ	1745	MAH
7	10	"	Yes	0640	HJ	1048	HJ
8	10	"	Yes	1100	HJ	1517	HJ
9	11	"	Yes	0640	HJ	1023	HJ
10	11	"	Yes	1030	HJ	1330	HJ
11	13	"	Yes	0630	HJ	1120	HJ
12							
13							
14							
15							
16							
17							
18							
19							
20							

