

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

A813344499

FACILITY: H & H TUBE & MFG CO		SRN / ID: A8133
LOCATION: 108 GARFIELD ST, VANDERBILT		DISTRICT: Gaylord
CITY: VANDERBILT		COUNTY: OTSEGO
CONTACT: Scott Sheppard , Director of Operations		ACTIVITY DATE: 05/11/2018
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: scheduled site inspection of minor source- exempted equipment.		
RESOLVED COMPLAINTS:		

**INTRODUCTION**

On May 11, 2018, AQD District Staff arrived onsite to conduct a *scheduled* self-initiated site inspection of H&H Tube (A8133), located at 579 Garfield Street, Vanderbilt, Michigan. The referenced facility had previously operated as Higgins Industry, Inc. until merging with their parent company and operating under their name (H&H Tube & Manufacturing Co.). A review of District Files indicated that the facility was operating only exempt processes.

Mr. John Hart and Mr. Scott Sheppard (Director of Operations) provided a tour of the facility and answered questions regarding operations.

Review of District Files indicated that the facility had been last inspected on July 31, 2008, no compliance issues were noted at that time.

**FACILITY**

Formerly identified as having been located at 108 Garfield Street, the present location is identified as 579 Garfield Street, Vanderbilt, Michigan. A review of District Files identifies the Facility as Higgins Industries Inc. (pre-1992), H&H Tube & Manufacturing Co. (1995) and more recently as H&S Tube. The Facility is presently part of Sunspring America Inc.

The H&H Tube Facility (AKA H&H) receives brass and copper piping which the company then cleans, straightens and extrudes (pulls) into different diameters. Extruded pipes are cut to desired lengths, deburred, and may be treated surficially and/or bent the pipe to create the desired product. Products include components for plumbing fixtures, musical instruments, brass beds, decorative work and some automotive parts.

No new processes were reported at the time of site inspection, though additional/replacement equipment since the 2008 site inspection was reported by Facility Staff. The Facility also reports installation of a relatively new emergency generator. The unit reflects a Rule 285 (2)(g) exemption, in that the unit is reported to have less than a 10 million BTU/hr maximum heat input.

The Facility consists of five buildings, the two largest buildings (located on west side of site) being for production and are referred to in historical reports as Building M (main) and Building N (north). The northern most of the two production buildings has added an additional 50 feet to the north end for additional space.

The smaller of the remaining buildings houses the facilities waste water treatment process. The Facility reports using reverse osmosis to recycle/reuse water at the facility. Reject water from the two NG-fired, reverse osmosis evaporators is further treated creating steam and salt crystals.

**Adjacent properties include:**

- undeveloped properties (east),
- residential properties (southeast),
- commercial (south and southwest),
- Industrial (west)
  - o MEC (the former Van Products N2611)
  - o Former North Central Steel & Fabrication (N2923)
- Industrial (north)

o Northern Timberlands Inc.

Weather conditions at the time of the site inspection were partially cloudy and warm. No visible emissions (VEs) were noted at the time of the site visit.

Facility staff indicated that an EPA unannounced site inspection was conducted at the site approximately 9 months ago. No follow-up communications have been received by the Facility as of the time of the May 11, 2018, site inspection.

**PERMITTING**

Permits of record for the Facility include the following:

PERMIT NO.	ASSOC. EQUIPMENT	ISSUE DATE	VOID DATE	EXEMPTION*	PTE At TIME OF PERMITTING
557-89**	Tube Cleaning Equipment (5) (Mineral Spirits cleaning boxes)	9/5/89	11/28/95	R285(o)(iv)	12.3 TPY VOC
359-90**	Parts Washer	6/1/90	11/28/95	R285(o)(iv)	1.2 TPY VOC
619-90**	Wastewater Evaporator (Electric)	9/28/90	11/28/95	R285(j) <i>(R285 (2)(m))</i>	Negligible
643-91**	Parts Washer (Rotary Screw) (mineral spirits)	10/1/91	11/28/95	R285(o)(iv)	0.22 TPY VOC
1136-92***	Sludge Dryer with Wet Scrubber ConRec Model Z6565	10/11/93	1/30/1995	R285(j)	
98-93**	Wastewater Evaporator (Gas-Fired) (Enviro-Vap Model VB-1)	5/5/93	11/28/1993	R285(j) <i>(R285 (2)(m))</i>	Nil

\*Note that the exemption Rule at the time of the exemption request is referenced, some of which may have changed since 1995. Updated Rule references are in Italics.

\*\*District Files contain a copy of correspondence from the Facility dated October 16, 1995, which requested “setting aside permits”. The referenced permits were voided in November 28, 1993.

\*\*\* The referenced permit was voided based on correspondence dated July 6, 1993, that clarified the nature of the sludge being dried as metal hydroxides and polyer from the tube mill effluents. R285(j) at that time only excluded “sewage sludge incinerators and dryers”. The most recent revision of the exemption Rule (R285 (2)(m)) restricts sludge incinerators and dryers from using the exemption.

Two permit applications (voided) are also of record for the facility and include:

- Tube Cleaning System using mineral spirits and exhausted into the general in plant environment exempt under R 285(o)(iv) (451-95), and
- Soil Gas Extraction (1002-90)

August 15, 2001, inspection report indicated that the groundwater cleanup equipment required to address TCE cleanup was removed prior to site inspection.

**REGULATORY**

The facility appears to meet the definition of a true minor.

Federal requirements associated with the facility would appear to be limited to the Facility's emergency generator, which would be subject to Part 63, Subpart A and ZZZZ, National Emission Standards for HAPs (NESHAPs) for Stationary Reciprocating Internal Combustion Engines (RICE) as well as to 40 CFR Part 60 (New Source Performance Standards AKA NSPS) Subpart IIII or JJJJ for Compression Ignition (CI) RICE or Spark Ignition (SI) RICE, respectively. Information regarding the NESHAP and NSPS requirements have been provided electronically to the Facility.

**EQUIPMENT**

At the time of the May 11, 2018, site inspection, the Facility provided a summary of processes and/or equipment onsite as well as their respective exemption to Rule 201 permitting. In addition, a review of inspection reports dated November 9, 1995, August 16, 2001, June 19, 2002 and August 5, 2008 appeared to confirm the exempt status of ongoing processes at the time of the site visits.

It should be noted that the exemptions to Rule 201 permitting were updated in December 2016, and the reference for the rule will have changed at that time. The following summaries identify processes/process equipment as well as both the exemption at the time of the previous reports, and the updated reference for the rule in *(Italics)* :

PROCESS/ACTIVITY	EXEMPTION
QA LAB	does not exhaust outside of work environment, should this change R283(1)(b) or (d) <i>(R283(2) (b) &amp; (d))</i>

**Rule 281 Cleaning, Washing and Drying Exemptions:**

PROCESS/ACTIVITY	EXEMPTION
Aqueous Wash Systems – no volatile solvents used	R281(e) <i>(R281(2)(e))</i>

**Rule 282 Furnaces, Ovens and Heater Exemptions:**

PROCESS/ACTIVITY	ASSOCIATED EQUIPMENT	EXEMPTION
Air Make-Up	Hartzell 4 MMBTU/Hr, Air Make-up Unit	R282(b)(i)
Annealing Furnace (2)	Electric, 597,120 BTU/Hr	R282(a)(i) <i>(R282(2)(a)(i))</i>
NG Boiler	Ray/Burnham Boilers 6,276,000 BTU/Hr	R282(b)(i)
NG Boilers (2) (Hot Water)	DE Dietrich GT 306A Boilers 150,000 BTU/Hr	R282(b)(i)
NG Boiler	Superior/Aztec/IGS 304 2,520,000 BTU/Hr	R282(b)(i)

**Rule 284 Container Exemptions:**

PROCESS/ACTIVITY	EXEMPTION
Drawing Compound (sodium stearate) Tanks	R284(a), <i>(R284(2)(a))</i>
Mineral Spirits Drum	R284(a), <i>(R284(2)(a))</i>
220 Gallon H2SO4 Tote	R284 (h)(i), <i>(R284 (2)(h)(i))</i>

**Rule 285 Misc. Exemptions (exhaust into the in-plant environment include):**

PROCESS/ACTIVITY	ASSOCIATED EQUIPMENT	EXEMPTION

Brazing	brazing, soldering, welding or plasma coating equipment	R285(l), (R285(2)(l))
Black Anodizing	surface treatment	R285 (r)(i), (R285 (2)(r)(i))
H2SO4 Pickling	acid surface treatment (heated) with counter current rinse	R285 (r)(ii) or (iii), R285 (2)(r)(ii) or (iii)
Alkaline Cleaning Solution Tanks	remove sodium stearate and oxidation from surfaces of formed pipes	R 285 (r)(iv), (R285 (2)(r)(iv))
S. End Die Cleaning	Cleaning	R285 (r)(iv), (R285 (2)(r)(iv))
Straightener Tube Cleaning Boxes	Cleaning	R285 (r)(iv), (R285 (2)(r)(iv))
Tube Polisher	Abrasive tube cleaner with collector that exhausts into work environment.	R 285 (l)(vi)(B), (R 285 (2)(l)(vi)(B))
Tube Drawing Equipment	Drawing of hot or cold metals	R285 (l)(i), (R285 (2)(l)(i))
Deburring	brush deburring	R285 (l)(vi)(B), (R285 (2)(l)(vi)(B))
Saw Blade Grinding/Sharpening		R285(l)(vi)(B), (R285 (2)(l)(vi)(B))
Pipe Cutting	Cutting Equipment	R 285(l)(vi)(B), (R285 (2)(l)(vi)(B))
RO Wastewater Evaporator (2)	located in water treatment building	R 285(m), (R285 (2)(m))

**COMPLIANCE**

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Mr. John Hart and Mr. Scott Sheppard (Director of Operations) provided a tour of the facility and answered questions regarding operations.

Review of District Files indicated that the facility had been last inspected on July 31, 2008, no complaints or violations are of record for the facility. Compliance status for the facility had been based on information provided during the May 11, 2018, site inspection, as well as a review of District Files.

Based on information available in District Files and obtained during the site visit and subsequent communications with the company, it appears that appropriate exemptions from Rule 201 permitting are being used by the Facility. However, discussions with Facility staff indicated that documentation of emissions for the process equipment utilizing exemptions showing compliance with Rule 278 does not exist at this time. A review of District Files failed to indicate that documentation had been requested during previous inspections, or that the Facility was notified that such records were to be maintained. The company has been notified that documentation of actual emissions validating emissions for the exempt process equipment are below thresholds should be obtained and maintained onsite. District Staff do not anticipate that the Facility will have any issues meeting the Rule 278 thresholds and follow-up regarding the Rule 278 compliance will be conducted later in the fiscal year. sgl

MACES- Activity Report

NAME Sharon C. Blane

DATE 6/8/2018

SUPERVISOR SN