

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

N322444856

FACILITY: HURON TOOL & ENGINEERING		SRN / ID: N3224
LOCATION: 635 LIBERTY, BAD AXE		DISTRICT: Saginaw Bay
CITY: BAD AXE		COUNTY: HURON
CONTACT: Aaron Darbee , Operations Manager		ACTIVITY DATE: 01/04/2018
STAFF: Matthew Karl	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Self initiated inspection		
RESOLVED COMPLAINTS:		

**On January 4, 2018, I (Matt Karl) conducted a compliance inspection at Huron Tool & Engineering located at 635 Liberty Street, Bad Axe, 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) Administrative Rules. Mr. Aaron Darbee, Operations Manager, assisted during the inspection. A follow-up meeting was conducted on June 15, 2018 to request additional information and provide Mr. Aaron Darbee with a Facility Assessment Survey.**

Huron Tool & Engineering makes custom metal parts for automotive and industrial industries. They employ ~40 staff and operate 1 shift. Their process includes purchasing the material for the project (usually steel). They then turn or mill the rigid material into a vast array of precision shapes and cuts. They perform heat treating for increasing the strength and durability of the metal. Finally, they have a variety of grinding equipment to shape and finish components. Additionally, they have pipe bending and welding capabilities. All the above equipment is exhausted into the in-plant environment, and there are 5 vents with fans along the west side of the facility that vent to the exterior.

During the inspection, there were several processes that were potentially subject to air permitting requirements.

First, the turning and milling equipment is likely exempt from permitting under R 336.1285(2)(l)(vi).

Similarly, the grinding equipment is likely exempt from permitting under R 336.1285(2)(l)(vi).

Next, the pipe bending equipment is likely exempt from permitting under R 336.1285(2)(l)(i).

Also, the welding equipment is likely exempt from permitting under R 336.1285(2)(i).

However, the heat treat molten salt quench equipment is likely not exempt and requires a permit. A violation notice letter will follow for installing the molten salt quench equipment without a permit to install under R 336.1201.

Summary: Based on the January 4, 2018 inspection and June 15, 2018 follow-up meeting at Huron Tool & Engineering it appears that the facility requires a permit to install for the molten salt quench equipment. The equipment for the turning and milling, grinding, pipe bending, and welding are all likely exempt from permitting requirements. At the time of my inspection and follow-up meeting the facility was not in compliance. Follow up will involve looking for the facility response to the VN letter and getting the heat treat molten salt quench equipment permitted.

NAME Matthew H. KarlDATE 6/25/18SUPERVISOR C. Gore