

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

P060131009

FACILITY: H & L Tool Company Inc.		SRN / ID: P0601
LOCATION: 32701 Dequindre Road, MADISON HTS		DISTRICT: Southeast Michigan
CITY: MADISON HTS		COUNTY: OAKLAND
CONTACT: Ron Best , Environmental Coordinator		ACTIVITY DATE: 03/18/2015
STAFF: Francis Lim	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT:		
RESOLVED COMPLAINTS:		

On March 18, 2015, I conducted an inspection at H & L Tool Company Inc. ('H & L'), located at 32701 Dequindre Rd., Madison Heights, 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. Ron Best, Machine Repair Leader and Environmental Coordinator represented the facility during the inspection.

H & L is a manufacturer of tube nuts. Tube nuts are nuts in the shape of a tube which are threaded. To make a connection, the tube nuts are placed over the tubing with the threaded end pointed towards the end of the tube to be flared. The tube flare will be clamped between the tube nut and the flare seat when tightened. Tube nuts are used in all types of automotive hydraulic lines, including brake fuel, oil, and transmission. Facility operates 2 10-hour shifts, six days a week.

Coiled rods (low carbon steel and stainless steel, mostly between 5-40 mm diameter) are cut to size and processed through cold header machines. Basically, in the cold heading machines, the workpiece is "hammered" or "punched" to form the shape. The machines are called cold heading machines because the workpiece is not preheated prior to forming (hot forging). For production of simple parts, high speed single die cold forming machines are used. For complex components, several die progressive cold forming machines are used (a tube nut goes from one die to the next to complete the manufacturing of complicated shape tube nuts). The formed parts are then threaded in the threading machines.

For very complex shapes, multiple spindle precision screw machines are used. Screw machines are automated lathes where components are machined by spinning on a high speed rotating lathe, shaving down the metal to a desired size.

Oil based coolant is used in the cold heading and screw machines. The coolant is replaced on a regular basis and stored in a waste tank. Mr. Best said they do not add any bacteriacide to the oil coolant. I did not notice any moldy odor from the coolant.

Oil that remains in the manufactured products is removed by washing in an alkaline based hot water washer. No solvent based cleaner is added to the wash water.

The facility operates 10 water-based cold solvent cleaners serviced by Safety Kleen.

This facility is a true minor source. I did not notice any objectionable odor inside and outside the facility.

NAME J. A. J. DATE 09-04-15 SUPERVISOR CTE