



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

June 25, 2018

Mr. Aaron Darbee
Huron Tool & Engineering
635 Liberty Street
Bad Axe, Michigan 48413

SRN: N3224, Huron County

Dear Mr. Darbee:

VIOLATION NOTICE

On January 4, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Huron Tool & Engineering located at 635 Liberty Street, Bad Axe, Michigan. The purpose of this inspection was to determine Huron Tool & Engineering's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Heat Treat Molten Salt Quench Equipment	R 336.1201	Installed equipment without a Permit to Install (PTI)

During this inspection, it was noted that Huron Tool & Engineering had installed and commenced operation of the Heat Treat Molten Salt Quench Equipment. However, the determination that this equipment was unpermitted equipment that required a permit was not made until after the follow-up meeting on June 15, 2018.

A program for compliance may include a completed PTI application for the Heat Treat Molten Salt Quench process equipment. An application form is available by request, or at the following website: www.michigan.gov/deqair (in the shaded box on the upper right-hand side of the page)

Be advised that Rule 201 of Act 451 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 16, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

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violation occurred (when was the equipment was installed); an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the DEQ, AQD, Saginaw Bay District Office, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Huron Tool & Engineering believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Huron Tool & Engineering. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Matthew Karl
Environmental Quality Analyst
Air Quality Division
989-439-3779

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Chris Hare, DEQ