

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

U6312041626367

FACILITY: Richard Tool and Die Corp.		SRN / ID: U63120416
LOCATION: 29700 W. K. Smith Drive, New Hudson		DISTRICT: Southeast Michigan
CITY: New Hudson		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 07/16/2014
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: FY 2014 inspection of Richard Tool and Die Corporation ("Richard")		
RESOLVED COMPLAINTS:		

Richard Tool and Die Corp. (U-63-12-0416)
29700 W. K. Smith Drive
New Hudson, Michigan 48165-8551

On July 16, 2014, I conducted a level-2 self-initiated inspection of Richard Tool and Die Corporation ("Richard"), a tool and die manufacturing company, located at 29700 W. K. Smith Drive, New Hudson, Michigan 48165-8551. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 (PA 451); and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Mr. Dan A. Bacci (Phone: 248-486-0900-ext. 308, Fax: 248-486-4660, Cell: 248-499-0931, E-mail: dbacci@rtddcorp.com), Operations Manager, assisted me. Ms. Valerie Chandler (Phone: 248-486-0900-ext. 209, Fax: 248-486-4660, E-mail: vchandler@rtddcorp.com), Human Resources Coordinator, was not present due to perhaps vacation.

Richard Tool and Die Corporation ("Richard") is in the business of making tool and die for auto manufactures and their suppliers. Richard is at this location in New Hudson for 12 years (relocated to site about CY2000) and is in business since 1966.

Sandblasting machine

One sandblasting machine with a cartridge filter system to control particulate emissions is present. Sandblasting machine is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(I) as all particulate emissions are discharged to in-plant environment after control.

Grinding machines

There are four dry grinders and one wet grinder; in all, five grinders.

Four dry grinders are equipped with particulate emission capture devices (one each) and the emissions are ducted via a common manifold to one air pollution control system consisting a cyclone and a cartridge filter system (16 filters). Cyclone acts as a pre-filter arranged in series with and prior to the cartridge system. The cyclone protects the filters knocking out large particles of higher momentum. The filters are cleaned using a pulse-jet air and the particulate is collected in 55-gallon drum that acts as a hopper.

In addition, there is one wet grinder with a separate cartridge filter system.

Both dry (4) and wet (1) grinding machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l) as all particulate emissions are discharged to in-plant environment after control.

EDM Wire machines

Four EDM (Electrical Discharge Machines) Wire machines to cut steel are present. Electricity is passed through wires so that steel is cut. Water is sprayed at cutting area to cool and to control particulate matter emissions. The metal being cut is immersed in water. Water is recycled / reused.

EDM Wire machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l) as all particulate emissions are discharged to in-plant environment after water-wash control.

Miscellaneous equipment

Miscellaneous process equipment such as cutting saws, hole punching machines, drill presses, lathes, mills, boring mills, CNC milling machines (4), tool assemble areas, stamping machines (8), CNC machines, etc. are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l) as all particulate emissions are discharged to in-plant environment without control.

Rule 287(b) Paint Spray

Some painting is done in the plant area (no booth) using rollers and spray cans. Painting activities are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(b).

Conclusion:

All metal cutting, grinding, welding, polishing, painting, etc. processes, are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l) and 336.1287(b) as all particulate emissions are discharged to in-plant environment after control when necessary.

NAME J. S. Hennehall DATE 08/12/2014 SUPERVISOR CTE