DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: On-site Inspection

A115168154

FACILITY: Montague Latch Company		SRN / ID: A1151
LOCATION: 2000 W DODGE RD, CLIO		DISTRICT: Lansing
CITY: CLIO		COUNTY: GENESEE
CONTACT: Joel Stinedurf , President		ACTIVITY DATE: 07/12/2023
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced inspection of facility last inspected by AQD in 2013.		
RESOLVED COMPLAINTS:		

On July 12, 2023, the Michigan Department of Environment, Great lakes, and Energy (EGLE), Air Quality Division (AQD) conducted a scheduled inspection of Montague Latch Company.

Facility description:

Montague Latch is a small metal machining shop. The parts manufactured are latch components.

Environmental contacts:

Joel Stinedurf, President; 800-665-2824; jstinedurf@montaguelatch.com

EGLE, AQD contact:

Dan McGeen, inspector; 517-648-7547; mcgeend@michigan.gov

Emission units*:

Metal machining processes; MAPC Rule 285(2)(I)(vi)(A) and/or (B)

*An emission unit is any part of a stationary source which emits or has the potential to emit an air contaminant.

Regulatory overview:

Montague Latch Company is classified as a minor source in the Michigan Air Compliance Enforcement System (MACES) database. A *major source* has the potential to emit (PTE) of 100 tons per year (TPY) or more, of one of the criteria pollutants. *Criteria pollutants* are those for which a National Ambient Air Quality Standard exists, and include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds, lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns.

This facility is considered a minor or *area source* for Hazardous Air Pollutants (HAPs), because it is not known to have a PTE of 10 TPY or more for a single HAP, nor to have a PTE of 25 TPY or more for combined HAPs.

A number of the Michigan Air Pollution Control (MAPC) Rules potentially apply. These rules exempt processes which meet the specified criteria from the requirement of MAPC Rule 201 to obtain a permit to install, aka an air use permit. The relevant exemption rules are:

- MAPC Rule 285(2)(I)(vi)(A) and (B) which exempt, among other things, metal and wood machining processes which are either:
 - · (A): used on a non-production basis, or
 - (B): exhaust only into the general, in-plant environment.
- MAPC Rule 285(2)(r)(iv), which exempts metal cleaning processes which exhaust into the general, inplant environment.

40 CFR 63 subpart XXXXXX (6X) - Nine Metal Fabrication and Finishing Area Source Categories could potentially apply to a facility like this. Applicability of the subpart is based on the NAICS used by Montague Latch to describe their business. The determination in AQD's 8/5/2013 inspection report was that the NAICS would likely be 332510, manufacturing of hardware including deadbolts. This NAICS is not subject to 6X. Therefore, it does not appear that Montague Latch Company is subject to 6X.

Fee status:

This facility is not considered fee-subject, as it is not known to be a major source for criteria air pollutants, or for HAPs, nor is it subject to a federal New Source Performance Standard or a Maximum Achievable Control technology standard.

This facility is not required to report annual emissions through the Michigan Air Emission Reporting System (MAERS).

Location:

- Address: 2000 W. Dodge Road, Clio, Genesee County.
- Description: Montague Latch is located north of Flint and about 4 miles south of Clio. It is a rural area and the facility is predominantly agricultural. It sits about 1,300 feet north of Dodge Road, on a long, unpaved drive. The closest residences are about 950 feet to the SSE and SE of the plant.

Required safety apparel:

Recommend safety glasses with side shields, and steel-toed boots. Hearing protection should be available, if needed.

Recent inspections:

8/5/2013: Compliance.

Complaints:

None in the AQD Michigan Air Compliance Enforcement System database, which dates to 2007.

Odor evaluation:

- · Start time: 3:19 PM.
- · Odors detected: None.
- Weather conditions Cloudy, humid, and 77 degrees F, with winds 0-5 miles per hour out of the SE.

Arrival:

- Arrival time: 3:21 PM.
- Fugitive dust: None detected, and the unpaved drive appeared to have been treated with calcium chloride or other dust suppressant.
- · Odors detected in parking lot: None.
- · Visible emissions detected: None.

AQD was represented by inspector Dan McGeen. This was an unannounced inspection.

- D. McGeen entered the office, explained the reason for the visit, and provided his credentials, per AQD procedure. He met with Paul Stinedurf, the brother of President Joel Stinedurf, who was offsite at the moment. P. Stindeurf accompanied D. McGeen on the inspection, and they were later joined by J. Stinedurf.
- D. McGeen was informed that nothing has changed in how they make their parts, but they do have some newer, CNC machining processes that have replaced older machining processes.

Inspection:

They have 3 different production rooms at the plant. One room is said to have 3 CNC machines, while a second room has 2. There is a shared dust collector for all the CNC units but one, which is said to have no emissions, from the cutting of metal cable. D. McGeen was informed. Baffles are used to reduce sound.

There were no signs of particulate emissions inside the plant. The machines used a non-petroleum-based coolant, which had a very mild smell.

There was an existing parts washer in use, with a water-based solution. This was the same solution they used as a coolant in the machines, D. McGeen was informed.

Remaining processes at Montague Latch included warehousing, assembly, and shipping and handling.

D. McGeen left the site 3:52 PM. No fugitive dust was stirred up the State car as it traveled down the unpaved roadway, due to application of dust suppressant.

Conclusion:

No instances of noncompliance were found. Housekeeping was done to a very high standard at the plant.

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DATE 9/27/2023

SUPERVISOR RB