

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

U08210322858764

<b>FACILITY:</b> Middleville Tool and Die Co.		<b>SRN / ID:</b> U082103228
<b>LOCATION:</b> 1900 Patterson Road, Middleville		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> Middleville		<b>COUNTY:</b> BARRY
<b>CONTACT:</b> Mike Cornell , Chief Operating Officer		<b>ACTIVITY DATE:</b> 07/01/2021
<b>STAFF:</b> Eric Grinstern	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b>
<b>SUBJECT:</b> Compliance Inspection		
<b>RESOLVED COMPLAINTS:</b>		

## FACILITY DESCRIPTION

Middleville Tool and Die Co. is a tooling and metal product manufacturing facility. The facility is located in a rural area of Barry County, with the nearest residences located NW and SW of the facility. A large dairy operation is located north of the facility and crop fields are located immediately west, south and east of the facility. The facility added a 60,000 sq/ft addition in 2014. The facility currently employs approximately 120 employees and operates three shifts five days a week.

At the facility, AQD staff met with Mike Cornell, Chief Operating Officer. Mr. Cornell accompanied staff on a tour of the facility. Current COVID-19 protocols were followed.

## REGULATORY OVERVIEW

It does not appear that the facility has previously been inspected by AQD. The facility does not currently hold any air use permits. Since the facility engages in metal fabrication, potential applicability was discussed regarding 40 CFR 63 Subpart XXXXXX, National Emissions Standards for Hazardous Air Pollutants (NESHAP) Nine Metal Fabrication and Finishing Source Categories at Area Sources. The facility will be provided information to aid in determining applicability when this inspection report is emailed to the facility. At this time AQD has not accepted delegation of Subpart XXXXXX, therefore delegation and enforcement of the standard remains with USEPA.

## COMPLIANCE EVALUATION

The facility's operations can be divided into two areas, Tooling and Manufacturing.

### Tooling

Tooling involves various processes utilized in the production and repair of stamping tools.

Processes include the following:

- Stamping press
- CNC
- Saws
- Grinders
- Sand Blaster
- Water Jet Cutter
- Tool Wash Bay
- Assembly

All of the processes are vented internally, except for the grinders located in the grinding room. The grinders are controlled by a Torit Collector that is located on the roof and vents to the outside atmosphere. Observation of the Torit Collector showed no visible emissions. A sand blaster is located in the grinding room that is controlled by an internally vented collector. The facility also has an abrasive water jet cutter that has a filtration unit for the water/abrasive cutting

fluid. Stamping tools are cleaned in a manual power wash bay that vents to the in-plant atmosphere. A cleaning agent is added to the water spray, for which the SDS and usage records were requested and received. Up until April 2021 the facility utilized a cleaning agent by the name of Fusion Clean 1110, which was also used in the floor scrubber. The facility utilized 2,310 gallons of cleaner in 2020 and 2,640 gallons in 2019. In April 2021, the facility switched cleaners and started using Hydroclean 10 KB (wash bay and floor scrubber). Used wash water is collected in a storage tank and is hauled off-site by Crystal Flash. It appear that the power wash bay is exempt from requiring an air use permit under either Rule 281(2)(e)(dependent upon the vapor pressure) or Rule 285(2)(l)(iii).

### Manufacturing

The facility primarily manufactures automotive and furniture related parts. Manufacturing primarily consists of stamping and welding stainless and mild steel along with a small amount of galvanized.

The facility has numerous coil steel stamping presses that are exempt from air permitting under Rule 285(2)(l)(i).

Adjacent to the stamping presses are two heated spray parts washers. The parts washers are equipped with filters and vent to the in-plant atmosphere. The washers use a water based cleaner, Broadmoor Products Moor Spray SR and a rust preventer, Broadmoor Products Additive Z. The facility supplied SDS and usage data for each of the additives for the past three years. Additive Z: 2019: 935 gallons, 2020 - 440 gallons, 2021 (up to date of inspection) - 385 gallons. Moor Spray RP: 2019 - 495 gallons, 2020 - 220 gallons, 2021 (up to date of inspection) - 220 gallons. It appears that the spray parts washers are exempt from air permitted under Rule 281(2)(e).

The facility has numerous welding cells, including mig, tig, plasma, laser and resistance welders. All of the welding operations vent to the in-plant atmosphere, either controlled or uncontrolled. The welding operations are exempt from air permitting under Rule 285(2)(i).

### Miscellaneous

Within the maintenance area, a small Safety Kleen style cold cleaner was observed. The observed cold cleaner had the lid closed and is exempt from permitting under Rule 281(2)(h)

### CONCLUSION

Based on the information obtained and observations made during this inspection, the facility appears to be in compliance with all applicable air quality rules and regulations. The facility is a minor source that does not require regular compliance inspections.

NAME Eric Grinstern

DATE 7/8/2021

SUPERVISOR HH