

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

N717859104

FACILITY: Midwest Tool and Cutlery Co		SRN / ID: N7178
LOCATION: 1210 Progress Street, STURGIS		DISTRICT: Kalamazoo
CITY: STURGIS		COUNTY: SAINT JOSEPH
CONTACT: Dave Mayo , EHS Manager		ACTIVITY DATE: 07/15/2021
STAFF: Chance Collins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On July 15, 2021 AQD staff traveled to St. Joseph County to perform an inspection of Midwest Tool and Cutlery Co. The facility was operating under Permit to Install No. 201-02 which has been voided as of 2/26/2009. The facility currently makes tin snips and aviation snips. The facility is currently operating as exempt under Rule 287(c) for EU-Plastisol.

AQD staff arrived on site at 11:05 a.m. to sunny conditions with a temperature of 75°F with a WSW wind of 11 mph. There were no noticeable odors or visible emissions upon arrival.

AQD staff met with Dave Mayo (EHS Manager) who walked staff through the facility and answered all questions. Mr. Mayo took over this position in November of 2020 and has been compiling and organizing recordkeeping requirements. The facility currently has 105 employees that operate two 8 hour shifts 5 days a week making 6,000 snips per day. The following discusses the results of the on-site inspection and review of records:

**Heat Treating:** The facility has 2 lines. One for regular tinnings and one for aviation tinnings. The aviation line has a salt bath furnace/tank (1561°F), a salt quench furnace/tank (445°F), air cool, a tempering furnace tank (470°F), air cool then a water/rinse tank. The regular tinning line has a salt bath furnace/tank (1560°F), a salt quench furnace/tank (450°F), air cool, a tempering furnace tank (470°F), air cool then a water/rinse tank. Permit to Install No. 201-02 was voided on 2/26/2009 due to the stack being removed and venting inside the plant. There are 3 wall fans in the room at roughly 15 feet. SDS for the quench oil states that it is AAAQuenchoil and is highly refined mineral oil.

**Parts Washer:** There is a Crystal Clean Aqueous Combination Parts Cleaner model 2725 located in the maintenance area. The lid was closed at the time of inspection. This unit is serviced monthly by Crystal Clean.

**Vibe Room:** There are several vibrators in the room that run during shifts. They contain rock ceramic media and water. There are wall fans for ventilation, but there is no dust in the room due to water containment.

**Tumbler Room:** For deburring parts with quartz media and water. There is an electric cob meal dryer to dry the parts which vents inside.

**Bluing Line:** The bluing line is for the aviation snips. The line coats the snips similar to how rifle barrels are blued. The snips are coated with a shine. The line includes a hot water degreasing tank, rinse tank, bluing tank, cold then hot water rinse tanks. All heating is completed with natural gas and the line is vented out. SDS's for the

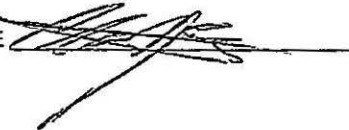
degreaser and for the bluing tanks were reviewed on site and appear to contain no VOC's.

**Plastisol Coating:** This is for tanners only. The parts are preheated in a natural gas oven and then dipped into liquid plastisol. SDS's for the coatings (Red, Blue, Channellock Blue, Black) were reviewed on site and did not appear to contain any VOC. Plastisol coating was changed in 2016 (since the last inspection).

The facility shows compliance with Rule 287(c) for EU-Plastisol with average purchase for the year. Records were reviewed and after discussion with Mr. Mayo, simple changes were made to recordkeeping to be in compliance with recordkeeping requirements. No Violation Notice will be sent at this time.

**Aviation Snip Finishing:** The previous conveyor line was removed in November of 2020, but the plastic grip/handle is still added at this point to finish the product.

At the time of inspection, the facility appeared to be in compliance.

NAME 

DATE 7/29/21 SUPERVISOR Ric 8/4/21