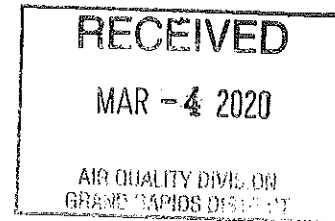


March 2, 2020

EGL, AQD, Grand Rapids District
350 Ottawa Avenue, NW, Unit 10
Grand Rapids, MI 49503



Re: SRN: N5877, Kent County

Dear Sir or Madame,

We have reviewed the findings of the inspection report and have taken the following corrective action steps to address the noted violations:

1. Topcoat Material Limit – Topcoat volatile organic compound (VOC) content above the limit of 6.0 lb/gal.

This is pertaining to our Klintcryn topcoat, which showed a lb/gal of 6.13. We have contacted our supplier and they have agreed to make a custom formulation for Gilmore that will not exceed the permit limit of 6.0 lb/gal. They will also supply a PDS/SDS with the formulation data. If, for any reason the new formula fails to work for Gilmore, they have another topcoat material that is very similar. Our plan is to have testing complete and this change implemented by May 31st, 2020.

2. Adhesive Applicator – Failure to utilize HVLP applicator or comparable technology.

This is pertaining to the spray guns we use to apply our contact adhesive, Permagrip 563. Originally, we used the same HVLP guns that we use to spray our finishes. However, due to quality issues, we eventually switched to CA Technologies Panther model spray guns. This was after struggling with inconsistent glue coverages, clogging equipment, and layers that were too thin resulting in de-lamination issues in the field.

We have reached out to our finishing equipment vendor on this and explained the requirement. They are checking into HVLP options that may include nozzles and caps that are classified as (and meet) HVLP standards. We are going to test different spray guns and configurations to try and find a combination that meets the HVPL standard and allows Gilmore, Inc. to maintain product quality. If efforts in finding a suitable spray gun are unsuccessful, we will formally request an exception for this process. Our plan is to have testing complete and this change implemented by August 31st, 2020.

3. Combined VOC and Acetone Recordkeeping – Failure to record VOC and acetone emissions combined.

We have revised our recordkeeping spreadsheet to include the combined VOC and acetone emissions. This includes the acetone content in any of our materials as well as acetone purchased as a supply for use. A separate tab summarizing this info and visual graph have been added to our spreadsheet and will be part of our regular monthly recordkeeping moving forward.

After making these revisions, we found that acetone and VOC combined has and continues to fall within our permitted limit of 30 tons. Per request, we revised our records back to Jan 2017.

Lastly, per (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(5)), we are requesting to be allowed to use formulation data from our vendor's PDS/SDS to determine VOC content, water content and density of the materials we use.

Sincerely,



Michael Emley
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