DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

N587728284	
	-
P 4 A B 17737 (***)	

FACILITY: Gilmore Inc.		SRN / ID: N5877
LOCATION: 321 TERMINAL ST	SW, WYOMING	DISTRICT: Grand Rapids
CITY: WYOMING		COUNTY: KENT
CONTACT: Mike Emley, Engine	eering Manager	ACTIVITY DATE: 01/14/2015
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

At 10:30 A.M. on January 14, 2015, Air Quality Division (AQD) staff Dave Morgan conducted an unannounced scheduled inspection of Gilmore Inc. located at 321 Terminal in Wyoming. The purpose of the inspection was to determine compliance with state and federal air quality regulations as well as PTI No. 36-96B. Mike Emley, the Manufacturing Engineer accompanied AQD staff on the inspection. A DEQ Inspection Brochure was presented at the beginning of the inspection.

FACILITY DESCRIPTION

The facility manufactures custom designed wood furniture. The facility consists of various woodworking equipment with an associated dust collector, four stain coating booths, one primer/sealer booth, two adhesive application booths, a mixing room, a boiler room and some minor assembly operations. The company is considered a synthetic minor source of hazardous air pollutant (HAP) emissions.

COMPLIANCE EVALUATION

In one part of the process, the company takes tubes of dense paperboard, applies a black prime coating to the inside of the paperboard, glues a wood laminate or veneer around the tube, then adds a wooden base and/or top to make a pedestal. In another part of the plant larger wood furniture is manufactured. The wood furniture is finished with stain and topcoat in house.

PTI No. 36-96B covers one prime coating booth (No. 7), two contact adhesive spray booths (Nos. 5 & 6), and four finish coating booths (Nos. 1-4). All booths are vented externally through dry fabric filters and stacks. Filters were installed in all booths and effectively maintained. All stacks appeared to be in compliance with required dimensions in the permit. It is noted that the company is adding an addition to the building which will result in the stacks on the finish booths being raised. As required by the permit, the company is using either Devilbiss Compact or Kremlin MVX high volume low pressure (HVLP) spray guns.

Coatings applied in the booths consist of stains, sealers, fillers, glazes, lacquers, primer, and contact adhesive. The company maintains all records using a spreadsheet. The company is maintaining monthly and 12-month rolling records in accordance with the permit for all coating lines. The company is in the process of making revisions to recordkeeping to ensure that records match the permit, including better daily records and more complete HAP recording. Sufficient records were available to determine compliance with emission limits. The company is using manufacturers' formulation data rather than Method 24 testing to verify the VOC content of coatings.

According to records, the company had the following emissions for the period from January 2014 through December 2014.

Equipment	Condition	Pollutant	Emissions	Limit	Compliance	Comments
EUWOODCOAT	1 F 1 3	VOC and acetone	< 21.4 tons	30.0 tons per 12-month rolling	Yes	
EUWOODCOAT	1.2.	Xylene	< 3.8 lbs/day	37.5 lbs/day	Yes	The highest monthly xylene emissions was 79 pounds in August 2014. The company operated 21 days in August 2014, Therefore the highest daily emissions would not be greater than 3.8 pounds per day.
EUWOODCOAT	1.3	Isopropyl Alcohol	< 9 lbs/day	82.5 lbs/day	Yes	Based on the highest usage of the highest IPA containing coating, (200 gallons in September 2014), IPA would be emitted at 190 lbs/month. The company operated 21 days in Sept. 2014, therefore the highest daily emissions would not be greater than 9 pounds per day.
EUWOODCOAT	1.4.	Formaldehyde	< 49 lbs/yr	200 lbs/yr	Yes	
EUWOODCOAT	Quantum Community Communit	VOC in adhesive	The state of the s		Yes	

FGFACILITY	1.2	HAPS aggregate		25.0 tons or less per 12- month rolling	Yes	
FGFACILITY	1.1	HAPS individual	< 4 tons	10.0 tons or less per 12- month rolling	Yes	
EUWOODCOAT		VOC in stains	< 6.0 lbs/gal (minus water)	7.0 lbs/gal (minus water) as applied	Yes	
EUWOODCOAT	И.2.			6.0 lbs/gal (minus waler) as applied	Yes	
	Water to drive a commission		(minus water)	5.2 b/gal (minus water) as applied		

The company maintains a current listing of the coatings through MSDSs and certified product data sheets.

Miscellaneous:

There is one baghouse used to collect sawdust from the various woodworking stations which are exempt from permitting under Rule 285(I)(vi). Upon arriving at the facility, no visible sawdust was observed on the ground around the baghouse and associated ductwork.

Also, there is one 3.35 million Btu/hour natural gas boiler on site which is exempt from permitting under Rule 282(b).

<u>SUMMARY</u>

Gilmore Inc. is considered in compliance with all applicable requirements. The company will submit revised records to AQD when updated. Attached to this report are company records.

NAME DILIP

TE **2/5//**5 SUPERVIS

Page 2 of 2 2/3/2015