

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection**

N819436706

FACILITY: CREATIVE MERCHANDISING SYSTEMS INC		SRN / ID: N8194
LOCATION: 4044 BROCKTON DR SE, KENTWOOD		DISTRICT: Grand Rapids
CITY: KENTWOOD		COUNTY: KENT
CONTACT: Mark Stancliff, Plant Manager		ACTIVITY DATE: 09/21/2016
STAFF: David Morgan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

At 1:30 P.M. on September 21, 2016, Air Quality Division staff Dave Morgan conducted an unannounced scheduled inspection of Creative Merchandising Systems Inc. (CMS). The purpose of the inspection was to verify compliance with state and federal air pollution violations. Accompanying AQD staff on the inspection was Mark Stancliff, Plant Manager. A DEQ Inspection Brochure was presented.

**FACILITY DESCRIPTION**

CMS manufactures wood display cases for grocery, retail and commercial businesses. The facility which began operations in January 2008 consists of hardwood and plywood woodworking equipment and finishing equipment. The company operates some processes under air use Permit to Install No. 6-09.

**COMPLIANCE EVALUATION**

The company has three spray booths used to apply solvent based stain and lacquer. Two booths were installed in 2008 and a third booth was installed in 2012. Each booth is setup independently of each other so each can do stain and finish coats. AQD staff discussed with Mr. Stancliff the requirements of Rule 287(c) and meeting a coating usage limit of 200 gallons per month to be exempt from permitting. AQD staff provided Mr. Stancliff guidance documents for applying Rule 287(c) or Rule 290 permit exemptions to the booths. It was later determined that the booths installed in 2008 were permitted under air use PTI No. 6-09 which was issued in response to a previously cited Rule 201 violation. The third booth installed in 2012 can be considered exempt under Rule 287(c) due to low material usage.

Filters were installed and appeared well maintained in each booth. Mr. Stancliff said that the filters are changed once per week. In addition Devilbiss Compact HVLP spray guns were used in two of the booths while a Kremlin HVLP gun was used the third booth. PTI No. 6-09 requires HVLP spray applicators.

Also, Mr. Stancliff confirmed that stack heights for all three booths were 45 feet above ground which for booths 1 and 2 meet the minimum required stack height in PTI No. 6-09.

Deficiencies were noted in the company's recordkeeping. According to Mr. Stancliff the company records the amount of coating and additive materials used in the booths for inventory purposes and not specifically for demonstrating compliance with air permits or rules. For the period from September 2015 through August 2016, monthly coating usage records (attached) show that total coating usage for permitted booths 1 & 2 was around 2,325 gallons. For booth 3, from September 2015 through August 2016, monthly coating and solvent usage did not exceed 95 gallons.

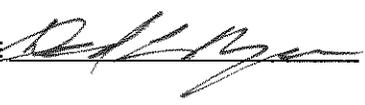
Under PTI No. 6-09, the company is required to calculate volatile organic compound (VOC) emissions on a monthly and 12-month rolling time period. The company does not maintain VOC emission calculations in accordance with the permit. Violations of Special Condition Nos. FGSprayBooths, VI.3 c & d will be cited. In addition, the company is not maintaining records of the VOC content of applied coatings in accordance with the permit. Therefore a violation of Special Condition FGSprayBooths V.1 and VI.3.b will be cited.

All of the company's woodworking equipment is exempt from permitting under Rule 285(l)(vi)(C) because the equipment is exhausted through a fabric filter collector. The fabric filter has a rated air flow of around 42,000 cubic feet per minute.

The company also uses a small amount of wood adhesives including a starch based glue and a contact adhesive (Hybond). Based on company information approximately 44.25 pounds (or approximately 4.4 gallons based on a product density of 10 pounds per gallon) of contact adhesive (Hybond) is used per month which is below the Rule 287(c) requirements. The other adhesives used is a water-based wood glue which is also exempt under Rule 287 (c).

SUMMARY

CMS will be sent a Violation Notice for the violations identified above. Records are attached.

NAME 

DATE 9/29/16

SUPERVISOR 