



RECEIVED  
JUL 10 2019  
AIR QUALITY DIVISION

June 27, 2019

Mr. Matthew R. Karl  
Department of Environment Quality, Great Lakes and Energy  
401 Ketchum St. Suite B  
Bay City, MI 48708

Dear Mr. Karl,

Thank you for bringing this to our attention. Upon review of our records it has been discovered that during the time period from October 2017 through May 2018 on a daily basis we were using a sealer that contained a higher concentration of butanol (Exhibit B). During that time period we were testing sealers from different vendors to find a sealer with higher solid content. The goal was to provide the market place with a more durable, higher quality finished product. After 6 months of testing we settled on what we have used since June 1, 2018; a butanol free sealer.

Also during the time period cited we introduced a paint program to a large retailer to help with the diversification of our product line and growth. This resulted in a large paint run during this period of time that raised our butanol throughput, (see Exhibit A) which was part of the cited violation along with the seal coat. The paint program since then has declined and the retailer dropped the program.

The combined use of sealer and paints during this time frame raised the aggregate HAPs which resulted in the higher levels of throughput during that time period.

In June of 2018 a butanol free sealer was introduced into our process and has since been used (Exhibit C).

## **Corrective Action**

The following are corrective measures that have been taken to correct the violation.

Discontinuation of a majority of paints with higher butanol levels

Use of a Butanol free sealer

Tighter controls in the formulation on the throughput in the 12 month rolling spreadsheet to show the values in tonnage.

Thank you again for bringing this to our attention.

Sincerely,



Laura Buschlen  
L.J. Gascho Furniture

Cc: Ms. Jenine Camilleri



Exhibit B

Discontinued  
MAY 31 2018  
Sealer

Date Printed: 8/19/2016

Product: E29C0801B+K

# Safety Data Sheet



Sealer

## 1. Identification

Product Information: E29C0801B+K

Product Name: HC Aristovar Ultrasand

Recommended Use: Surface Preparation or Protection

Supplied by: RPM Wood Finishes Group  
2220 US Hwy 70 SE Suite 100  
Hickory, NC 28602  
USA

Company Phone No: (800) 522-8266

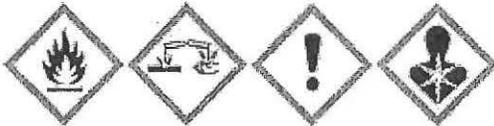
Emergency Phone No. CHEMTREC: (800) 424-9300

International Emergency No. CHEMTREC: (703) 527-3887 (Collect calls are accepted)

## 2. Hazards Identification

GHS Classification  
Carc. 1B, Eye Dam. 1, Flam. Liq. 2, Muta. 1B, Skin Irrit. 2, STOT SE 3 NE

Symbol(s) of Product



Signal Word

Danger

### GHS HAZARD STATEMENTS

Flammable Liquid, category 2	H225	Highly flammable liquid and vapour.
Germ Cell Mutagenicity, category 1B	H340	May cause genetic defects.
Carcinogenicity, category 1B	H350	May cause cancer.
STOT, single exposure, category 3, NE	H336	May cause drowsiness or dizziness.
Skin Irritation, category 2	H315	Causes skin irritation.
Serious Eye Damage, category 1	H318	Causes serious eye damage.

### GHS LABEL PRECAUTIONARY STATEMENTS

P210	Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.
P201	Obtain special instructions before use.
P281	Use personal protective equipment as required.
P308+P313	IF exposed or concerned: Get medical advice/attention.
P261	Avoid breathing dust/fume/gas/mist/vapours/spray.
P403+P233	Store in a well-ventilated place. Keep container tightly closed.

P280	Wear protective gloves/protective clothing/eye protection/face protection.
P302+P352	IF ON SKIN: Wash with plenty of soap and water.
P362	Take off contaminated clothing.
P305+P351+P338	IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
P310	Immediately call a POISON CENTER or doctor/physician.

**GHS SDS PRECAUTIONARY STATEMENTS**

P240	Ground/bond container and receiving equipment.
P241	Use explosion-proof electrical/ventilating/lighting/ equipment.
P242	Use only non-sparking tools.
P243	Take precautionary measures against static discharge.

**3. Composition/Information on ingredients**

<u>Chemical Name</u>	<u>CAS-No.</u>	<u>Wt. %</u>	<u>GHS Symbols</u>	<u>GHS Statements</u>
n-butyl acetate	123-86-4	25-40	GHS02-GHS07	H226-336
butanol	71-36-3	10-25	GHS02-GHS05-GHS07	H226-302-315-318-332-335-336
toluene	108-88-3	2.5-10	GHS02-GHS07-GHS08	H225-304-315-332-336-373
ethyl acetate	141-78-6	2.5-10	GHS02-GHS07	H225-319-332-336
ethanol	64-17-5	2.5-10	GHS02	H225
cellulose nitrate, cellulose ester	9004-70-0	2.5-10	No Information	No Information
isobutanol	78-83-1	2.5-10	GHS02-GHS05-GHS06	H226-315-318-331-335-336
mak	110-43-0	2.5-10	GHS02-GHS06	H226-302-331
isopropanol	67-63-0	1.0-2.5	GHS02-GHS07	H225-302-319-336
m-xylene	108-38-3	1.0-2.5	GHS02-GHS07	H226-315-332
dipropyl ketone	123-19-3	1.0-2.5	GHS02-GHS07	H226-332
ethylbenzene	100-41-4	0.1-1.0	GHS02-GHS07-GHS08	H225-304-332-373
aliphatic hydrocarbons	8052-41-3	0.1-1.0	GHS08	H304-340-350-372
p-xylene	106-42-3	0.1-1.0	GHS02-GHS07	H226-312-315-332
2,6-dimethyl-4-heptanone	108-83-8	0.1-1.0	GHS02-GHS06	H226-302-312-331-335
zinc naphthenate	12001-85-3	<0.1	No Information	No Information

The exact percentage (concentration) of ingredients is being withheld as a trade secret.

The text for GHS Hazard Statements shown above (if any) is given in the "Other information" Section.

**4. First-aid Measures**

**FIRST AID - EYE CONTACT:** IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

**FIRST AID - SKIN CONTACT:** IF ON SKIN: Wash with plenty of soap and water.

**FIRST AID - INGESTION:** IF SWALLOWED: rinse mouth. Do NOT induce vomiting. IF exposed or if you feel unwell: Call a POISON CENTER or doctor/physician.

**FIRST AID - INHALATION:** IF INHALED: If breathing is difficult, remove victim to fresh air and keep at rest in a position comfortable for breathing. IF exposed or if you feel unwell: Call a POISON CENTER or doctor/physician.

Exhibit C

June 2018  
Start

Date Printed: 5/18/2018

Product: E29C00002+K(53)

# Safety Data Sheet



**FINISHWORKS®**

## 1. Identification

Product Information: E29C00002+K(53) *Sealer*

Product Name: AristoSeal

Recommended Use: Surface Preparation or Protection

Supplied by: CCI | Finishworks  
Division of RPM Wood Finishes Group, Inc.  
2220 US Hwy 70 SE Suite 100  
Hickory, NC 28602  
USA

Company Phone No: (800) 522-8266

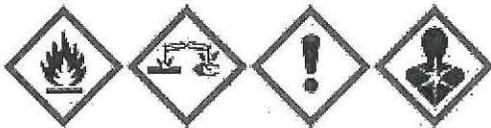
Emergency Phone No. CHEMTREC: (800) 424-9300

International Emergency No. CHEMTREC: (703) 527-3887 (Collect calls are accepted)

## 2. Hazards Identification

GHS Classification  
Carc. 1B, Eye Dam. 1, Flam. Liq. 2, Muta. 1B, STOT SE 3 NE

Symbol(s) of Product



Signal Word  
Danger

### GHS HAZARD STATEMENTS

Flammable Liquid, category 2	H225	Highly flammable liquid and vapour.
Germ Cell Mutagenicity, category 1B	H340	May cause genetic defects.
Carcinogenicity, category 1B	H350	May cause cancer.
STOT, single exposure, category 3, NE	H336	May cause drowsiness or dizziness.
Serious Eye Damage, category 1	H318	Causes serious eye damage.

### GHS LABEL PRECAUTIONARY STATEMENTS

P210	Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.
P280	Wear protective gloves/protective clothing/eye protection/face protection.
P303+P361+P353	IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower.
P403+P235	Store in a well-ventilated place. Keep cool.
P308+P313	IF exposed or concerned: Get medical advice/attention.
P202	Do not handle until all safety precautions have been read and understood.
P405	Store locked up.
P403+P233	Store in a well-ventilated place. Keep container tightly closed.

Product: E29C00002+K(53)

INHALED: Remove person to fresh air and keep comfortable for breathing.  
IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.  
Immediately call a POISON CENTER or doctor/physician.

CS  
ground/bond container and receiving equipment.  
Use explosion-proof electrical/ventilating/lighting/ equipment.  
Use only non-sparking tools.  
Take precautionary measures against static discharge.

## Ingredients

<u>CAS-No.</u>	<u>Wt. %</u>	<u>GHS Symbols</u>	<u>GHS Statements</u>
123-86-4	25-40 ✓	GHS02-GHS07	H226-336
141-78-6	10-25 ✓	GHS02-GHS07	H225-319-332-336
78-83-1	2.5-10 ✓	GHS02-GHS05- GHS06	H226-315-318-331-335-336
64-17-5	2.5-10 ✓	GHS02	H225
67-64-1	2.5-10 ✓	GHS02-GHS07	H225-302-319-336
108-38-3	1.0-2.5 ✓	GHS02-GHS07	H226-315-332
763-69-9	1.0-2.5 ✓	GHS06	H331
100-41-4	0.1-1.0 ✓	GHS02-GHS07- GHS08	H225-304-332-373
106-42-3	0.1-1.0 ✓	GHS02-GHS07	H226-312-315-332
64742-82-1	0.1-1.0 ✓	GHS08	H304-340-350-372
8052-41-3	0.1-1.0 ✓	GHS08	H304-340-350-372
50-00-0	0.1-1.0 ✓	GHS05-GHS06- GHS08	H302-311-314-317-330-335-341-350

Ingredients is being withheld as a trade secret.

Above (if any) is given in the "Other information" Section.

Rinse cautiously with water for several minutes. Remove contact lenses, if present and

(or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower.

: rinse mouth. Do NOT induce vomiting. IF exposed or if you feel unwell: Call a POISON

Remove person to fresh air and keep comfortable for breathing.