

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

B433860151

FACILITY: R T LONDON COMPANY		SRN / ID: B4338
LOCATION: 1642 BROADWAY NW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: David Larkin , Plant Manager		ACTIVITY DATE: 09/10/2021
STAFF: Michael Cox	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Unannounced Inspection		
RESOLVED COMPLAINTS:		

On Friday September 10, 2021, AQD Staff Michael Cox (MTC) conducted an unannounced scheduled inspection of RT London Company located at 1642 Broadway, N.W., Grand Rapids, MI 49504. The purpose of this inspection was to verify compliance with all applicable air quality rules and regulations. MTC arrived on site at approximately 1:00 pm and contacted Mr. Victor Osipsov, Building Manager, to conduct the inspection. Records that were requested were provided by Mr. David Larkin, Plant Manager. No visible emissions or odors were noted upon arrival.

Facility Description:

RT London has approximately 100 employees and operates one shift five to six days a week in the summer and approximately 50 employees during the winter months due to customer orders. The facility manufactures wood institutional furniture mainly for schools, universities, and libraries. Some of their product has expanded into the health care industry and governmental agencies. The operation includes woodworking and building the furniture, coating, and finishing the furniture and upholstery. The majority of the building is used for warehousing product until it is shipped during the summer months. Their peak production is based on purchases for schools and school calendar funding; therefore, a lot of products are prepared for shipment during the spring and shipped prior to the start of the next school year.

The cutting, sawing, sanding, etc. of the wood, along with the 18,000-cfm dust collection system that is internally vented appears to be exempt from permitting under a Rule 285(2)(I)(vi)(B). An additional 40,000 cfm internally vented baghouse was added to the operation in 2012, which improved the quality of the indoor air in the woodworking area. Since the new baghouse is less than 60,000 cfm it appears to be exempt for permitting under Rule 285(2)(I)(vi)(B) as well. Much of the flat wood panels arrive pre-finished which reduces their current on-site coating operations. In the wood working area there are edge banders using hot melt glues.

RT London does their own upholstery in the building. They currently use hot melt and the 3M glue (see attached MSDS). There are no external emissions from the upholstery area. Two workstations are used for spraying adhesive. Usage records for the adhesives used for these booths were requested for the time period of

January 2020 through August 2021. After a review of the usage records, it appears that the adhesive coating process in the upholstering department is exempt from permitting under Rule 287(2)(c).

One coating line is composed of 4 booths and 5 stacks. The stain, topcoat, and sealer are applied one after the other as each part is moved along the line. Another line has 5 booths and 5 stacks, and each booth applies an individual coating; one booth applies the stain, one booth applies the topcoat, and one booth applies the sealer, etc.

Mat filters were in place on the booths that are operational. Booths that are used for storage did not have filters in place. They use a high solids catalyzed lacquer with HVLP guns.

Records were requested for the time period of January 2020 through August 2021 to demonstrate compliance with Rule 290(2)(a)(i) requirements. Based on the records from January 2020 through August 2021 the facility wide 12-consecutive month total emissions occurring from Booths 8-15 and the adhesive spray workstations for the time period of January 2020 through December 2020, was 1.79 tons of VOCs. The highest facility wide monthly emissions of VOCs occurred during the month of July 2020 when 664.6 pounds of VOC was emitted, which is below the 1000-pound limit per emission unit in permit exemption Rule 290(2)(a)(i).

There is one boiler on site which is used for the entire building complex for heating purposes. The boiler is owned by the building owner and not RT London. RT London currently leases space from the owner of the building for their operations as does several other companies and does not have access to the boiler.

Addition Information:

The following booths were noted to have been either in use, removed, or used as storage within the building.

Booths 1-6 (removed)

Booth 7 (used for storage)

Booths 8-15 (used for all the coating operations)

Booth 16 (used for storage)

Booth 17 (removed)

Booths 18-19 (used for storage)

Booths 20-31 (removed)

Booths 32-36 (removed)

The remaining booths and associated stacks are as follows:

Booth 7 one stack No. 7

Booth 8 stain booth one stack No. 8

Booth 9 one stack No. 9

Booth 10 one stack No. 10

Booth 11 one booth two stacks only one operating no. 11

Booth 12 one booth two stacks nos. 12 and 13

Booth 14 one booth two stacks nos. 14 and 15

Booth 16 one stack No. 16

Conclusion:

Based on the observation made and the records reviewed, the facility appears to be in compliance with State and Federal air quality regulations.

NAME Michael T. Cox

DATE 9/28/2021

SUPERVISOR HH