



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

February 12, 2020

Mr. Mike Emley  
Gilmore, Inc.  
321 Terminal Street SW  
Wyoming, Michigan 49548

SRN: N5877, Kent County

Dear Mr. Emley:

**VIOLATION NOTICE**

On January 23, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Gilmore, Inc. located at 321 Terminal Street SW, Wyoming, Michigan. The purpose of this inspection was to determine Gilmore, Inc.'s compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 36-96B.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Topcoat Material Limit	PTI No. 36-96B, EUWOODCOAT, Special Condition (SC) II.2	Topcoat volatile organic compound (VOC) content above the limit of 6.0 lb/gal.
Adhesive Applicator	PTI No. 36-96B EUWOODCOAT, SC IV.2	Failure to utilize HVLP applicator or comparable technology.
Combined VOC and Acetone Recordkeeping	PTI No. 36-96B EUWOODCOAT, SC VI.3	Failure to record VOC and acetone emissions combined.

During the recordkeeping review, information provided to AQD by Gilmore, Inc. indicates that the VOC content of each component of the topcoat is above 6.0 lb/gallon. This is a violation of PTI No. 36-96B, EUWOODCOAT, SC II.2.

During the inspection, a review of the adhesive spray gun found that it is a conventional style applicator and is not considered high volume low pressure (HVLP) equivalent as required. This is a violation of PTI No. 36-96B, EUWOODCOAT, SC IV.2.

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Finally, a review of the records found that Gilmore, Inc. is not including acetone emissions in the combined limit for VOC and acetone as required. This is a violation of PTI No. 36-96B, EUWOODCOAT, SC VI.3.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 4, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue, NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Gilmore, Inc. believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Gilmore, Inc. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
616-558-1092

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Heidi Hollenbach, EGLE