



Worthen Coated Fabrics

1125 41st Street S.E.
Grand Rapids, MI 49508
Phone 888-840-6155
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FAX 616-742-8995



September 13, 2016

Mr. David Morgan
MDEQ – Air Quality Division
Grand Rapids District Office
350 Ottawa, NW – Unit 10
Grand Rapids, MI 49503-2341

re: Worthen Coated Fabrics (SRN P0634) Violation Notice

Dear Mr. Morgan,

Worthen Coated Fabrics is in receipt of your Violation Notice of August 26th alleging a violation of Permit-to-Install (PTI) 151-15, EUFabricCoating Special Conditions V.2, 3 and 5 and FG-MACT-OOOO, Special Condition V.1.

You have requested that actions be initiated to correct the alleged violations and also have requested a written response by September 15, 2016. You have indicated that the written response should include the dates that the violations occurred, an explanation of the cause and duration of the violation, whether the violation is ongoing, a summary of the actions that have been taken and are proposed to be taken to correct the violation and that dates by which these actions will take place, and what steps are being taken to prevent a reoccurrence.

EUFabricCoating, Special Condition V.2 – The company is not maintaining an accurate record of coatings used in calculating mass volatile organic compounds (VOC) emissions.

Upon investigation of the data entered into our in-house record keeping system, Permit Management, it appears that some of the data was not entered correctly due to confusion over units, e.g., percent by weight versus pounds per gallon. Also, it appears that some of the Method 24 test results were not entered in lieu of manufacturer's formulation data.

This data is entered by a chemist who works at the Worthen headquarters in Nashua, NH. The data is currently being updated. We expect that the database will be fully updated by October 15th, but no later than October 31th. We hope that this timeframe is acceptable as the data entry process is time consuming.

EUFabricCoating, Special Condition V.4 – The company is not recording the pressure differential between the PTE and adjacent areas in an acceptable format.

As you know, EUFabricCoating is a new process. We have had a significant number of start-up issues including being able to record and extract the PTE pressure differential in a format that is meaningful. In order to expedite this problem, we have contracted with a local vendor, MD Instruments, who will be assisting us. MD Instruments is currently waiting for the delivery of materials needed to conduct an evaluation of the PTE control system. This work will be scheduled on a priority basis and we anticipate that it will be completed this month. The latest that we could complete this work without jeopardizing the scheduled performance test of the RTO is October 10th. We are still awaiting an

approval letter to conduct the RTO test and the performance of the PTE is an issue that could potentially delay the RTO test approval. We will keep the Grand Rapids District apprised of our progress in resolving this issue.

EU Fabric Coating, Special Condition V.5 – The company is not recording the temperature of the RTO in a satisfactory manner or in an acceptable format.

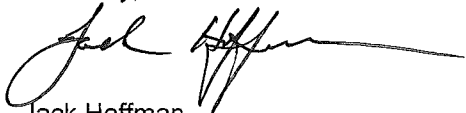
Similar to the start-up issues we experienced with the PTE pressure differential records, we have had problems in recording the temperature of the RTO. Since the AQD inspection in July, we have purchased and installed some new software. The new software now records the temperature of the RTO in a format that is clear. A sample of these records is attached. Please let us know if this format is acceptable.

EU-MACT-0000, Special Condition V.1 – The company is not maintaining specific hazardous air pollutant (HAP) records including the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the organic HAP emission rate in kilogram per kilogram of solids applied.

We currently use a cloud based system, Permit Management, to track air emissions at our Butterworth facility. We are also using this system for the 41st Street facility. Upon investigation, we discovered that some of the report features in Permit Management were not yet configured for the 41st facility. We have worked with the vendor that maintains the system and the appropriate report upgrades have been made. A sample of these records is attached. Please let us know if this format is acceptable.

Thank you for your assistance and patience during this difficult start-up. We hope that these responses are acceptable but please let me know if you have any questions or require additional information.

Sincerely,



Jack Hoffman
General Manager

cc: Ms. Heidi Hollenbach