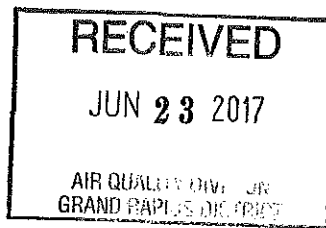


June 15th, 2017

Ms. April Lazzaro
MDEQ – Air Quality Division
Grand Rapids District Office
350 Ottawa, NW – Unit 10
Grand Rapids, MI 49503-2341



Worthen Coated Fabrics
1125 41st St SE
Grand Rapids, MI 49508
Ph: 616-742-8990
Fax: 616-742-8995

RE: Worthen Coated Fabrics (SRN P0634) Violation Notice

Dear Mrs. Lazzaro,

Worthen Coated Fabrics is in receipt of the Violation Notice dated June 9, 2017 alleging a violation of *Permit-to-Install (PTI) No. 151-15, EU-FabricCoating, Special Condition V1.5*.

You have requested that actions be taken to correct the alleged violations and have requested a written response by June 22, 2017. You also 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, the dates by which these actions will take place and what steps are being taken to prevent a reoccurrence.

EU-FabricCoating, Special Condition V1.5 – Failure to satisfactorily maintain RTO temperature records.

As was found during the inspection on May 18th, 2017, Worthen was unable to provide RTO temperature records for the full time period requested by the inspector (March-May 2017). Upon review, this data was found to be intermittent between December 5th, 2016 and March 24th, 2017.

The reasoning for the lack of data is due to a former employee not following Worthen recordkeeping policies. Though the employee was involved in the development of the permit and its requirements, he ultimately failed to follow the appropriate process to retain the required data for later review.

With respect to corrective/preventative actions, please note that prior to the inspection, this employee left Worthen employment. As of the day following the departure of this employee, Worthen has full RTO temp/PTE pressure data retention and will be implementing further methods to ensure a robust and redundant system including:

- 1) All RTO Chart recorder data (including temperature readings for the RTO stack, RTO inlet, RTO combustion chamber, RTO outlet, PTE #1 pressure and PTE #2 pressure) will be stored in the chart recorders memory for 60 days. Worthen will investigate reducing the sample rate (currently 1 sample/sec) to increase data storage
- 2) A raw data export of RTO chart recorder data will be taken on a monthly basis to a USB flash drive and kept for no less than 10 months.
- 3) A dedicated workstation will be employed to connect to the RTO Chart Recorder to provide continuous offline storage of chart recorder data and to allow remote access to the recording system to ensure proper operation by onsite and offsite (corporate) personnel.
- 4) Data from #3 will be backed up as part of Worthen's server backup program
- 5) Verification of this system will be performed on a weekly basis once operational.

Items 1), 2) and 4) and 5) are currently being performed and 3) will be in place no later than July 1st, 2017.

As a result, Worthen asserts that it is no longer in violation of these permit conditions.

Sincerely,

A handwritten signature in cursive script that reads "Jack Hoffman".

Jack Hoffman
Program Manager
Worthen Coated Fabrics