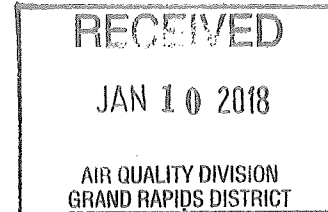




Worthen Industries, Inc
3 East Spit Brook Road
Nashua, NH 03060-5783

January 10, 2018

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



RE: Worthen Coated Fabrics (SRN P0634) Violation Notice

Dear Ms. Lazzaro:

Worthen Coated Fabrics (Worthen) is in receipt of the Violation Notice dated December 20, 2017 alleging a violation of Renewable Operating Permit MI-ROP-P0634-2017 for the Fabric Coating Line (FG-MACT-0000), Special Condition VII.4.

As requested, a written response herein is being provided by January 10, 2018 and actions were taken to correct the alleged violation. As requested in the Violation Notice, Worthen's response outlined below includes the dates that the violation 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.

Dates and Duration

As indicated in the Violation Notice, Worthen Coated Fabrics did not submit the Notification of Compliance Status (NOCS) due by November 10, 2017, as required by 40 CFR 63.4310(c). The violation occurred between November 11, 2017 and present day. Worthen is currently preparing the NOCS and anticipates submittal by January 31, 2018.

Explanation of Cause

Since Worthen acquired its fabric coating line in early 2016, it has relied on an outside consultant to assist with environmental compliance. Following the violation in June 2017, the consultant was given full responsibility for ensuring that the recordkeeping, monitoring, reporting and notification requirements were being fulfilled. Either due to an oversight or lack of understanding of the requirements contained in Subpart OOOO, the consultant did not identify the requirement to submit the notification. Since the submittal deadline is not explicitly identified in the permit and Worthen relies on outside contractor assistance, plant personnel who are familiar with the permit were not aware of the impending deadline. The cause for not submitting the NOCS on time was purely inadvertent and Worthen has and will take steps to prevent a reoccurrence.

Worthen Industries
www.worthenind.com

Completed Actions and Steps Taken to Prevent a Reoccurrence

Worthen has made several changes relative to roles and responsibilities at the facility that will help ensure future compliance deadlines will not be missed. Going forward, I have been given the responsibility of overseeing environmental compliance at Worthen's Grand Rapids facility. I will be spending at least one week a month in Grand Rapids. A new Plant Manager with a background in the coating industry has been hired and will begin employment at the beginning of February. Worthen is committed to the certification of the Grand Rapids facility to ISO 14001 by the end of 2018. Worthen has purchased and is installing GenSuite software, an electronic EHS management package. The software is a compliance and management tool equipped with compliance calendars and deadline alerts. Worthen has contracted with a consulting firm that has provided environmental consulting services for over ten years for its New Hampshire and Virginia facilities. As of the date of this letter, Worthen has completed several components of the NOCS and will continue to work with its consultant to ensure the notification is submitted as soon as possible.

Proposed Actions and Action Dates

Worthen will expedite completion of the NOCS and proposes to finalize and submit it to EPA and the DEQ no later than January 31, 2018. Worthen will continue to work with its consultant to ensure that no future deadlines are overlooked and that the facility is maintaining the records and preparing the reports that are required by its permit.

April, please contact me if you have any questions or require further information.

Sincerely,

 for

Jerry Henry
Senior Chemist/Environmental Coordinator
Worthen Coated Fabrics