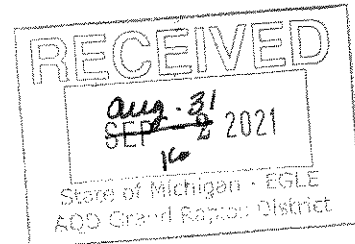




Worthen Coated Fabrics
1125 41st StSE
Grand Rapids, MI
49508 Ph: 616-
742-8990
Fax: 616-742-8995

August 30, 2021

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



RE: Worthen Coated Fabrics (SRN P0634) Violation Notice

Dear April:

Worthen Coated Fabrics (Worthen) is in receipt of the Violation Notice dated August 10, 2021 alleging violations to specific requirements contained in 40 CFR Part 60 Subpart VVV.

As requested, a written response herein is being provided by August 31, 2021 and actions have and will be taken to correct the violations. As requested in the Violation Notice, Worthen's response outlined below includes the dates that the violation 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, 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 timely notifications of construction commencement and initial startup as required by 40 CFR 60.7. In addition, VOC emissions from Worthen's coating mix preparation equipment are not vented to a 95% efficient control device and the mix vessel covers do not fully meet the specifications outlined in 60.743. Worthen started operation on June 8, 2016. On July 12, 2021 Worthen submitted the initial notification as required by 60.7. Worthen is in the process of resolving the vessel cover issue and venting of VOC emissions to a control device.

Explanation of Cause

Worthen was issued a permit to install on September 14, 2015, started operations on June 8, 2016, and was issued a Renewable Operating Permit effective September 28, 2017. The permit applications were prepared by an environmental consultant and reviewed by the Department of Environment, Great Lakes, and Energy (EGLE) (formerly known as the Department of Environmental Quality) and the Environmental Protection Agency (EPA). Over the years, the facility has been inspected many times by DEQ/EGLE and the EPA. Until recently, Worthen was not aware of being subject to the requirements of Part 60 Subpart VVV, nor was the rule's applicability identified by EGLE, EPA, or Worthen's former consultant. As a result of an applicability review and permit renewal at Worthen's New Hampshire facility, Subpart VVV was flagged as potentially applying to Worthen's Grand Rapids facility.

Completed Actions

Worthen has posted procedures detailing the proper use of covers as specified in 60.744(c)(1). The current covers were not designed to cover the tanks when mixing is taking place. Worthen has developed a new cover design that meets the regulatory specification.

Proposed Actions and Action Dates

Worthen proposes to fabricate new, compliant covers and install them no later than November 12, 2021. Worthen has decided to install a carbon adsorption system for the control of VOC emissions from the coating mix preparation equipment. The control device will be equipped with a monitoring system to continuously monitor the inlet and outlet VOC concentrations. In accordance with 60.744(a), the monitoring system will be installed and calibrated according to the manufacturer's specifications. The regulation does not require installation of a continuous emissions monitoring system (CEMS) as defined by Part 60. System vendors have been chosen and specifications are being finalized so that orders can be placed no later than September 10, 2021.

Control device and monitoring equipment are expected to arrive by November 12, 2021. Due to material supply shortages nationwide, receipt of vessel cover materials and control device and monitoring equipment may take longer than anticipated. Once the equipment arrives, Worthen will provide an update to EGLE on when installation and startup will take place.

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

Sincerely,

PP: 

Tony Harb
Plant Manager
Worthen Industries, Inc.

c: Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE, Air Quality Division
P.O. Box 30260
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