



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

January 15, 2019

Mr. Jack Hoffman
Worthen Coated Fabrics
1125 41st Street SE
Grand Rapids, Michigan 49508

SRN: P0634, Kent County

Dear Mr. Hoffman:

VIOLATION NOTICE

On November 27, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Worthen Coated Fabrics located at 1125 41st Street SE, Grand Rapids, Michigan. The purpose of this inspection was to determine Worthen Coated Fabrics' 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 Renewable Operating Permit (ROP) number MI-ROP-P0637-2017.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-FabricCoating	MI-ROP-P0634-2017, Special Conditions V.1 and V.2	Failure to conduct Method 24 testing of solvent and water-based coatings in 2018.
Mix Room	Rule 201	Failure to obtain a permit.

During this inspection, it was noted that emissions from the mix room are above Rule 290 permit exemption levels. The AQD staff advised Worthen Coated Fabrics on November 27, 2018 that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

Also, during the records review it was identified that Worthen Coated Fabrics did not conduct Method 24 testing of solvent or water-based coatings in 2018.

A program for compliance may include a completed PTI application for the mix room process equipment. An application form is available by request, or at the following website: www.michigan.gov/deqair (in the shaded box on the upper right-hand side of the page).

Mr. Jack Hoffman
Worthen Coated Fabrics
Page 2
January 15, 2019.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 5, 2019 (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 the DEQ, 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 the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Worthen Coated Fabrics 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 Worthen Coated Fabrics. 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, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Heidi Hollenbach, DEQ