



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 10, 2021

Mr. Frederic P. Worthen III
Worthen Coated Fabrics
3 East Spit Brook Road
Nashua, NH 03060

SRN: P0634, Kent County

Dear Mr. Worthen:

VIOLATION NOTICE

On June 18, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), 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-P0634-2017.

During the inspection and subsequent July 12, 2021 Initial Notification submittal, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-FabricCoating and Coating Mix Preparation Equipment	40 CFR 60.7(1)	Failure to submit notification of the date construction of an affected facility is commenced within 30 days after such date.
EU-FabricCoating and Coating Mix Preparation Equipment	40 CFR 60.7(3)	Failure to submit notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
Coating Mix Preparation Equipment	40 CFR 60.742(c)(1)	Failure to maintain a cover on each piece of affected coating mix preparation equipment and vent VOC emissions from the covered mix equipment to a 95 percent efficient control device.
Coating Mix Preparation Equipment	40 CFR 60.743(c)	Failure to install covers according to the specifications
Coating Mix Preparation Equipment	40 CFR 60.743(c)	Failure to post procedures detailing the proper use of covers.

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On July 12, 2021, the AQD received an initial notification indicating that Worthen Coated Fabrics is subject to the Standards of Performance for Polymeric Coating of Supporting Substrates Facilities as promulgated in 40 CFR Part 60, Subpart VVV. The initial start-up date for this facility was June 8, 2016. 40 CFR Part 60, Subpart VVV requires the installation of a 95 percent efficient control device on the Coating Mix Preparation Equipment, which has not occurred.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 31, 2021 (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 EGLE, 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 EGLE, 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 Lazaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Mr. Steve Sutter, Worthen Coated Fabrics
Mr. Tony Harb, Worthen Coated Fabrics
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE