



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

February 21, 2019

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 January 15, 2019 alleging a violation of Renewable Operating Permit MI-ROP-P0634-2017 for the Fabric Coating Line (FG-MACT-OOOO), Special Condition V.1 and V.2 and in violation of Rule 201, failure to obtain a permit.

A written response herein is being provided by February 22, 2019 and the actions taken to correct the alleged violations. 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 conduct Method 24 testing of solvent and water based coatings in 2018. The violation occurred between January 1, 2019 to January 16, 2019. Worthen sent solvent and water based coatings for Method 24 testing on January 9, 2019 and received results on January 16, 2019.

As indicated in the Violation Notice, Worthen Coated Fabrics allegedly exceeded the Rule 290 permit exception limits. The violation allegedly started October 16, 2017 and is ongoing.

Explanation of Cause

During Worthen's ISO 14001 audit in early October 2018 it was determined that the Method 24 testing had not been completed. Steps were taken to obtain the 10 water base samples and the 10 solvent based samples. Due to the timing of the coating schedule, some of the coatings were not sampled. All the samples were collected by the first week of January 2019 and results will be submitted to the MDEQ by February 22, 2019.

Since the mix room operations are covered by the MACT Subpart OOOO Standard, it was Worthen's position that it was covered by the permit. There are conditions in the permit that apply to the mixing operations, therefore Worthen considered it part of the permit.

Completed Actions and Steps Taken to Prevent a Reoccurrence

Worthen has been using GenSuite software, an electronic EHS management package, to track compliance deadlines. Method 24 testing had been entered into the compliance calendar but in hindsight the due date should have been set earlier. The deadline for conducting Method 24 testing has now been moved to July 1st. Gensuite has the ability to send email reminders to all interested parties within Worthen, and this function has been activated.

Worthen has finished many steps toward preparing a permit application for the mix room with a goal of having a completed application ready by April 30, 2019. An update on the progress will be provided to DEQ by March 31, 2019.

Proposed Actions and Action Dates

Worthen has entered into Gensuite a July 1<sup>st</sup> due date for Method 24 testing. This should account for any scheduling delays in obtaining coating samples.

We will provide DEQ with an update on the mix room permit application process by March 31, 2019. At that time Worthen will determine if a complete application will be ready by April 30, 2019.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Jerry Henry". The signature is written in black ink and is positioned above the typed name.

Jerry Henry  
Environmental Coordinator  
Worthen Coated Fabrics