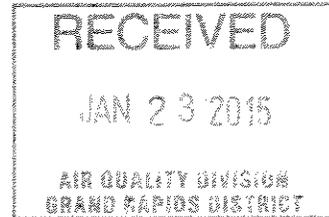


January 13, 2015

Ms. Jenifer M. Dixon  
MDEQ – Air Quality Division  
Grand Rapids District Office  
350 Ottawa, NW – Unit 10  
Grand Rapids, MI 49503-2341



**Re: Worthen Coated Fabrics (SRN B4043) Violation Notice**

Dear Ms. Dixon,

Worthen Coated Fabrics is in receipt of your Violation Notice of December 30<sup>th</sup> alleging a violation of Renewable Operating Permit (ROP) No. MI-ROP-B4043-2010a, EU-SOLVENT-COAT, special conditions number II.4 and VI.4.a for "no records of clean-up solvent available".

You have requested that actions be initiated to correct the alleged violations and also have requested a written response by January 20, 2015. You have indicated that the written response should include the dates that the violations 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 and that dates by which these actions will take place, and what steps are being taken to prevent a reoccurrence.

As you are aware, our batch tickets have an area where production employees are supposed to record the amount of solvent used for the clean-up of each batch. We also use the same type of solvent for clean-up that we use to thin our coating materials. It appears that not all employees are recording the amount of clean-up solvent in the proper area but instead recording the combined thinning and clean-up solvent as thinning solvent, only. This may have resulted in underreporting of clean-up solvent usage but not overall solvent usage. Because the data was omitted from the production records, an exact date and duration cannot be determined, however we believe that the error did not extend prior to July 2014 due to subsequent inventory counts.

Upon discovery of this oversight, we will be training employees on the proper filling out of batch tickets (as well as additional steps) to ensure the differentiation of solvent usage between thinner and clean-up. This training will be completed on a priority basis but will be completed no later than February 13, 2015.

Please note that the recordkeeping oversight did not result in the exceedance of any emission limit.

Please let me know if you have any questions and thank you for your time and cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "David Worthen". The signature is written in a cursive style with a long horizontal stroke at the end.

David Worthen  
President

cc: Ms. Heidi Hollenbach  
Ms. Prudy Blue