

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Other

B404328137

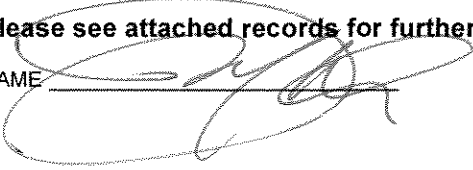
FACILITY: Worthen Coated Fabrics		SRN / ID: B4043
LOCATION: 524 Butterworth SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Roy Davis, Quality and Environmental Coordinator		ACTIVITY DATE: 12/30/2014
STAFF: Jenifer Dixon	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Updated emissions calculations for the daily gallons per hours usage for EU-SOLVENT-COAT.		
RESOLVED COMPLAINTS:		

During the initial scheduled inspection a violation was noted regarding the daily amounts of water based coating used on EU-SOLVENT-COAT, Special Condition II.3 of MI-ROP-B4043-2010a. There were two days that were identified as exceeding this daily limit. Upon further investigation, Mr. Davis resubmitted updated calculations that indicated that the initial records submitted were in error.

JD has reviewed this supplemental information and agrees with the statements made and the calculations that have been done. This violation has been removed from the violation notice that is being sent to the company.

Please see attached records for further information.

NAME



DATE

12.30.14

SUPERVISOR

PAB

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

B404328100

FACILITY: Worthen Coated Fabrics		SRN / ID: B4043
LOCATION: 524 Butterworth SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Roy Davis, Quality and Environmental Coordinator		ACTIVITY DATE: 12/10/2014
STAFF: Jenifer Dixon	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: The purpose of this inspection was to complete a scheduled inspection and to determine the facility's compliance with all applicable Air Quality Rules and Regulations and Title V permit (ROP) No. MI-ROP-B4043-2010a.		
RESOLVED COMPLAINTS:		

This was an unannounced inspection on December 10, 2014. A copy of the "Environmental Inspections: Rights and Responsibilities" was provided.

The purpose of this inspection was to complete a scheduled inspection and to determine the facility's compliance with all applicable Air Quality Rules and Regulations and Title V permit (ROP) No. MI-ROP-B4043-2010a.

JD arrived in the area of the facility and no odors or excess opacity was observed during the time before, during, or after the inspection. No odors or excess opacity were observed during the time of the inspection. Mr. Roy Davis, Quality and Environmental Coordinator, provided pertinent information about the facility and the operations contained therein.

Worthen Coated fabrics (Worthen) is a fabric coating facility that contracts primarily as a clothing label fabric coater, but also coats fabrics for other uses. The facility is currently operating three shifts. Worthen has two coating lines. One coating line is used primarily for solvent based coatings (Line 1). Line 1 is controlled by a catalytic oxidizer. The other line (Line 2) is used solely with water based coatings and has no add-on controls.

NOTE: All correspondence with the facility is attached hard copy to this report.

## ROP NO. MI-ROP-B4043-2010a

### EU-SOLVENT-COAT (Line 1)

This emission unit covers the knife coating of textiles with solvent and water-based coating materials, and solvent clean-up. A textile web is continuously fed to a coater stand which has the capability to coat either or both fabric sides. The coating is poured onto the fabric, then scraped into an even layer by the knife blade. The excess coating is scraped from the fabric and returned to the coating pan. The fabric then passes under a fume hood and into a 3-zone gas-fired drying oven. The oven emissions are exhausted to a catalytic incinerator. The catalytic incinerator is subject to compliance assurance monitoring (CAM). Specific CAM requirements are included.

#### I. EMISSION LIMIT(S)

1. VOC emissions are limited to 56.8 pounds per hour based on a 24 hour averaging period. *As an example, the pounds per hour number for November 6, 2014, the highest pounds per hour day in November, was 10.25 pounds per hour. This is well below the permitted limit.*
2. VOC emissions are limited to 59.6 tons per year based on a 12 month rolling time period. *The 12 month rolling number was reviewed for each month in the time period of January 2014 to December 2014. The highest rolling 12 month emissions for that time period were 36,575 pounds or 18.3 tons. This is well below the permitted limit.*
3. VOC content is limited to 4.80 pounds per gallon of coating solids applied based on a 24-hour averaging period. *The amount of pounds per gallon of coating solids applied was for October 2014*

was 0.33 and November 2014 was 0.69, well below the permitted limit.

## **II. MATERIAL LIMIT(S)**

1. Coatings are limited to 150,000 gallons applied based on a 12-month rolling time period as determined at the end of each calendar month.

*The 12 month rolling number was reviewed for the time period ending in November 2014. Since the facility utilized so many water based coatings in the process, Worthen is allowed to subtract the water in the coatings when determining the total gallons applied. The month rolling total was for November 2014 was less than 80,000 gallons. This is well below the permitted limit.*

2. Solvent–base coatings are limited to 53.25 gallons per hour as applied based on actual operating hours per calendar day.

*As an example, the highest gallons per hour number for October and November 2014, occurred on November 14, 2014 and was 50.80 gallons per hour. This is below the permitted limit.*

3. Water–base coatings are limited to 100 gallons per hour as applied based on actual operating hours per calendar day.

*The records supplied indicate compliance with this limit with the exception of two days in October 2014. On October 4 and October 6, 2014 the 100 gallon per hour as applied limit was exceeded at amounts of 160 gallons and 433 gallons respectively. A Violation Notice (VN) will be issued for this exceedance.*

4. Clean-up solvent usage is limited to 850 gallons per 12-month rolling time period as determined at the end of each calendar month.

*Based on conversations with Mr. Davis regarding the recordkeeping for the clean-up solvent, it was determined that the clean-up solvent was not being recorded correctly. The result of this is that no 12-month rolling numbers were available. A VN will issued for this oversight.*

## **III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The following shall be observed during switchovers to uncontrolled and controlled operations:
  - a. The catalytic incinerator shall be properly operated during all switchover periods and all equipment clean-up.
  - b. When switching from a controlled operation to an uncontrolled operation, the catalytic incinerator shall be properly operated for the first 15 minutes of the use of coatings which do not require controls.
  - c. When switching from an uncontrolled operation to a controlled operation, the catalytic incinerator shall be stabilized at 600 degrees Fahrenheit for 15 minutes prior to the use of coatings which require controls.

*Based on the records reviewed and the observations made during the inspection, the facility appears to be doing as required for controlled (solvent based coatings) to uncontrolled (aqueous coating) operations, or vice versa.*

2. The permittee shall comply with the Malfunction Abatement Plan required in Appendix 9.

*Some records for the plan were observed. The plan is not physically attached to this report.*

3. An excursion will occur if:
  - a. The temperature of the oxidizer inlet is measured below 600 degrees Fahrenheit during process operation.
  - b. The structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.
  - c. The oxidizer does not meet the permitted destruction efficiency.
  - d. The catalyst is found to be poisoned or masked beyond the operational range of the catalyst as defined by the manufacturer.

- e. The integrity of the bypass damper or the exhaust system has been compromised.
- f. The bypass interlocks are inoperative.
- g. The system does not meet the permitted capture efficiency.
- h. The integrity of the existing plastic curtains or panels is compromised.

*The facility evaluates whether or not an excursion occurs for the semi-annual and annual deviation reports. The methodology used by the facility to determine whether or not an excursion has occurred appears to be satisfactory.*

- 4. Upon detecting an excursion or exceedance, the permittee shall restore operation of EU-SOLVENT-COAT to its normal or usual manner of operation as expeditiously as practical in accordance with good air pollution control practices for minimizing emissions.

*This is done as required.*

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

- 1. The permittee shall not operate EU-SOLVENT-COAT unless the catalytic incinerator is installed and operating properly or unless the coatings being used in the coating process comply with the emission limits specified in SC I.3 without the VOC emissions reduction provided by the catalytic incinerator. Proper operation of the catalytic incinerator is defined as a VOC capture efficiency of 85 percent (by weight), a VOC destruction efficiency of 95 percent (by weight), a minimum catalyst bed inlet temperature of 600°F, and a maximum space velocity of 10,160 per hour.

*This is a statement as to the capacity of the unit and is not variable, nor does it need to be tested.*

#### **V. TESTING/SAMPLING**

- 1. A stack test (EPA Reference Test Method 25A) at owner's expense, in accordance with Department requirements, shall be conducted by October 5, 2011 and once every five years after that as a verification of the capture and destruction efficiency of the catalytic incinerator.

*No stack testing is required at this time.*

- 2. The permittee shall determine the VOC content, water content and density, of the five most frequently used coatings, as applied and as received, using Method 24 at a minimum of once per year.

*This has been done as required. The Method 24 testing for 2014 are attached to this report.*

- 3. The permittee shall determine the actual solids volume fraction of each coating, as applied, by calculation, using the manufacturer's formulation data.

*This has been done as required by the permit condition.*

- 4. The permittee shall verify the VOC emission limit specified in SC I.1 for EU-SOLVENT-COAT, the capture efficiency of EU-SOLVENT-COAT, and the destruction efficiency of the catalytic incinerator control system, by testing at owner's expense, in accordance with Department requirements. The permittee must complete the testing once every five years. No less than 90 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of the VOC emission limit, the capture, and the destruction efficiency of the control system include the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.

*This test has been previously conducted and passed. No further action is necessary at this time.*

- 5. The permittee shall conduct conversion efficiency and surface area testing on the catalyst semiannually.

*This has been done as required by the permit condition.*

**VI. MONITORING/RECORDKEEPING**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.

*This has been done as required by the permit condition.*

2. The permittee shall equip and maintain a temperature gauge, with a digital readout display monitor and continuous chart recorder, on the incinerator during operation to continuously measure and record the inlet and outlet operating temperatures of the catalytic oxidizer.

*This has been done as required by the permit condition.*

3. The permittee shall maintain records necessary to comply with the Malfunction Abatement Plan required in Appendix 9.

*This is done as required. See attached records.*

4. The permittee shall calculate and/or record the following information on a daily basis EU-SOLVENT-COAT:
  - a. The usage rate of coatings, thinners and clean-up solvents in gallons as applied.
  - b. The VOC content of the solvent-based coatings, water-based coatings, thinners, and clean-up solvents as applied.
  - c. The VOC content in pounds of VOC per gallon of solids applied per 24-hour average using the method detailed in Appendix 7.
  - d. The solvent-based and water-based coating usage rate in gallons per hour based on actual operating hours per calendar day
  - e. The dates and times of incinerator catalyst coating switchovers, and incinerator shutdown times.
  - f. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - g. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

*Most of this has been done as required by the permit condition. However, as stated above, based on conversations with Mr. Davis regarding the recordkeeping for the clean-up solvent, it was determined that the clean-up solvent was not being recorded correctly. The result of this is that no 12-month rolling numbers were available. A VN will issued for this oversight.*

5. The permittee shall calculate and/or record the following information on a weekly basis EU-SOLVENT-COAT:
  - a. Preventative maintenance inspections.
  - b. The visual inspections of the plastic side curtains that compromise the physical enclosure surrounding the coating line applicator and oven feed area to aid in ensuring proper capture efficiency.

*This is done as required. See attached records.*

6. The permittee shall equip and maintain a temperature gauge on both the inlet and outlet of the catalyst bed. The gauges must have a digital readout display monitor and continuous chart recorder during operation to continuously measure and record the inlet and outlet operating temperatures of the catalytic oxidizer.

*This has been done as required by the permit condition. These gauges were observed during the inspection.*

7. The permittee shall conduct monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.

*According to Mr. Davis, this is being done as required by the permit condition*

8. The permittee shall calculate and/or record the following information on a daily basis for EU-SOLVENT-COAT:
  - a. The VOC emissions rate in pounds per hour using the method detailed in Appendix 4.
  - b. The dates and times of incinerator catalyst restoration, coating switchovers, and incinerator shutdown times.

*This has been done as required by the permit condition and various records are attached to this report.*

9. The permittee shall keep the following information on a weekly basis for EU-SOLVENT-COAT:
  - a. Preventative maintenance inspections.
  - b. The visual inspections of the plastic side curtains that comprise the physical enclosure surrounding the coating line applicator and oven feed area to aid in ensuring proper capture efficiency.

*This has been done as required by the permit condition and various records are attached to this report.*

10. The permittee shall calculate and/or record the following information on a monthly basis for EU-SOLVENT-COAT:<sup>2</sup>
  - a. The permittee shall visually review the temperature printed on the continuous chart recordings to ensure the minimum temperature requirement was maintained.

*This has been done as required by the permit condition.*

11. The permittee shall calculate and/or record the following information on a semiannual basis for EU-SOLVENT-COAT:
  - a. The results of an external inspection to determine structural integrity of the catalytic oxidizer.
  - b. A determination of the operational condition of all the interlocks, including oven flow damper and control device bypass damper and the integrity of the exhaust system (including dryer fan) from the process to the control device.
  - c. Accuracy of the catalytic oxidizer inlet thermocouple.

*This has been done as required by the permit condition.*

12. The permittee shall calculate and/or record the following information on an annual basis for EU-SOLVENT-COAT:
  - a. The results of an internal inspection (including burner) to determine structural integrity of the catalytic oxidizer.

*This has been done as required by the permit condition.*

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be postmarked or received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30.
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be postmarked or received by appropriate AQD district office by March 15 for the previous calendar year.
4. Each semiannual report of monitoring deviations shall include summary information on the number, duration, and cause of exceedances/excursions in the reporting period; and the corrective actions taken in response.

5. Each semiannual report of monitoring deviations shall include summary information on monitor downtime in the reporting period.
6. Each semiannual report of monitoring deviations shall include a description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period, if appropriate. If a QIP has been completed, the report shall include documentation that the QIP has been implemented, and a discussion pertaining to whether the QIP implementation has reduced the likelihood of excursions or exceedances.

*These reports have been completed and submitted as required for the previous 12 months.*

### **VIII. STACK/VENT RESTRICTION(S)**

1. Catalytic incinerator stack dimensions are limited to a maximum exhaust diameter of 36 inches and a minimum above ground height of 30 feet.

*Based on a visual inspection of the stack, this appears to be met as required. No actual measurements were taken.*

2. Catalytic incinerator BYPASS stack dimensions are limited to a maximum exhaust diameter of 30 inches and a minimum above ground height of 32 feet.

*Based on a visual inspection of the stack, this appears to be met as required. No actual measurements were taken.*

### **IX. OTHER REQUIREMENT(S)**

1. The permittee shall promptly notify the AQD if a modification of the CAM plan needs to be completed because the existing plan is found to be inadequate. This permittee shall submit a proposed modification to the plan if appropriate.

*Not applicable for this inspection.*

2. The permittee shall, at all times, maintain the monitoring system, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

*This has been done as required by the permit condition.*

3. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall conduct all monitoring in continuous operation at all times that the pollutant-specific emissions unit is operating.

*This has been done as required by the permit condition.*

4. The permittee shall comply with all applicable requirements of 40 CFR Part 64.

*According to Mr. Davis, this is being done as required.*

## **EU-AQUEOUS-COAT (Line 2)**

### **I. EMISSION LIMIT(S)**

1. VOC emissions are limited to 1,000 pounds per calendar month.

*For the recording period of January 2014 to December 2014, the highest emissions occurred in July 2014. The line emitted 218.72 pounds of VOCs. This is well below the permitted limit.*

2. VOCs are limited to 4.8 pounds per gallon applied coating solids based on a 24 hour averaging period.

*For the recording period of October 2014 and November 2014, the highest amount of pounds per gallon of coating solids applied for was October 31, 2014 was 4.7.*

**II. MATERIAL LIMIT(S) - NA**

**III. PROCESS/OPERATIONAL RESTRICTION(S) - NA**

**IV. DESIGN/EQUIPMENT PARAMETER(S) - NA**

**V. TESTING/SAMPLING**

1. The VOC content, water content, and density of any coating, reducer, thinner, additive, and catalyst as applied and as received, shall be determined using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the VOC content may be determined from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the Method 24 results shall be used to determine compliance.

*This has been done as required by the permit condition.*

2. The five most frequently used coatings shall be tested during a calendar year.

*This has been done as required by the permit condition.*

**VI. MONITORING/RECORDKEEPING**

1. The permittee shall keep the following information on a monthly basis<sup>2</sup>:
  - a. Gallons (with water) of each coating, reducer, thinner, additive, and catalyst used.
  - b. VOC content (minus water and with water) of each coating, reducer, thinner, additive, and catalysts applied.
  - c. VOC mass emission calculations determining the monthly emission rate in pounds per calendar month.

*These records are kept as required. Please see attached for more information.*

2. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with EU-AQUEOUS-COAT<sup>2</sup>:
  - a. Gallons of each solvent used and reclaimed.
  - b. VOC content, in pounds per gallon, of each solvent used.
  - c. VOC mass emission calculations determining the monthly emission rate in pounds per calendar month.

*These records are kept as required. Please see attached for more information.*

3. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition.

*These records are kept as required. Please see attached for more information.*

4. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, thinner, additive, and catalyst, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor.

*These records are kept as required. Please see attached for more information.*

5. The permittee shall maintain records of the weekly preventative maintenance inspections.

*These records are kept as required. Please see attached for more information.*



**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be postmarked or received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30.
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be postmarked or received by appropriate AQD district office by March 15 for the previous calendar year.

*These reports have been completed and submitted as required for the previous 12 months.*

**VIII. STACK/VENT RESTRICTION(S)**

1. SV-AQ-OVEN (aqueous oven cure stack) is limited to a minimum above ground height of 32 feet.

*Based on a visual inspection of the stack, this appears to be met as required. No actual measurements were taken.*

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable requirements of Rule 610, "existing coating lines; emission of volatile organic compounds from existing automobile, light-duty truck, and other product and material coating lines.

*This is being done as required.*

2. The permittee shall comply with the Preventative Maintenance Plan required in Appendix 9.

*This is being done as required. Please see attached records.*

**FG-0000**

This flexible group applies to all emissions units subject to the National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles, 40 CFR Part 63 Subpart 0000.

**I. EMISSION LIMIT(S)**

1. Permittee shall comply with the limits established in 40 CFR 63.4291, as of the compliance date of May 29, 2006.

*According to Mr. Davis, this is being done as required.*

**II. MATERIAL LIMIT(S) - NA**

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. Permittee shall comply with the work practice standards established in 40 CFR 63.4293.

*According to Mr. Davis, this is being done as required.*

**IV. DESIGN/EQUIPMENT PARAMETER(S) - NA**

#### **V. TESTING/SAMPLING**

1. Permittee shall comply with the performance testing requirements specified in 40 CFR 63.4340, 40 CFR 63.4350, 40 CFR 63.4360, 40 CFR 63.4361, 40 CFR 63.4362, 40 CFR 63.4363 and 40 CFR 63.4364.

*The facility utilizes the add-on control option allowed by Subpart OOOO to show compliance with this NESHAP. This unit has been tested in accordance with the compliance date listed in the NESAHP.*

#### **VI. MONITORING/RECORDKEEPING**

1. The permittee shall comply with the recordkeeping requirements specified in 40 CFR 63.4312.

*This overlaps with the requirements contained in EU-SOLVENT-COAT and EU-AQUEOUS-COAT and is being done as required.*

2. The permittee shall utilize the methods specified in 40 CFR 63.4331 to demonstrate initial compliance with the emission limitations.

*According to Mr. Davis this was done as required.*

3. The permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control and monitoring equipment by May 29, 2006 if an emission capture system and add-on control device is used to determine compliance.

*This overlaps with the requirements contained in EU-SOLVENT-COAT and EU-AQUEOUS-COAT and is being done as required.*

#### **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be postmarked or received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30.
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year.
4. Semiannual compliance reports pursuant to 40 CFR 63.4311(a)(1)(iv). Report shall be postmarked or received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30.

*These reports have been completed and submitted as required for the previous 12 months.*

#### **VIII. STACK/VENT RESTRICTION(S) - NA**

#### **IX. OTHER REQUIREMENTS**

1. The permittee shall comply with the general requirements as specified in 40 CFR 63.4300.
2. The permittee shall comply with the notification requirements as specified in 40 CFR 63.4310.
3. The permittee shall comply with the compliance requirements for the organic HAP overall control efficiency and oxidizer outlet organic HAP concentration options specified in 40 CFR 63.4350, 40 CFR

63.4351 and 40 CFR 63.4352 for EU-SOLVENT-COAT.

4. The permittee shall comply with the compliance requirements for the emission rate without add-on controls option as specified in 40 CFR 63.4330, 40 CFR 63.4331, and 40 CFR 63.4332 for EU-AQUEOUS-COAT.
5. As of May 29, 2006, the permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart OOOO- National Emission Standards for Hazardous Air Pollutants: Printing, Coating and Dyeing of Fabrics and Other Textiles, and Subpart A-General Provisions.

*The facility utilizes the add-on control option allowed by Subpart OOOO to show compliance with this NESHAP. This unit has been tested in accordance with the NESAHAP. In addition, they keep appropriate HAP calculations. The necessary actions to show compliance with the Subpart are being completed as required. These requirements also overlap with some of the requirements contained in EU-SOLVENT-COAT and EU-AQUEOUS-COAT and is being done as required.*

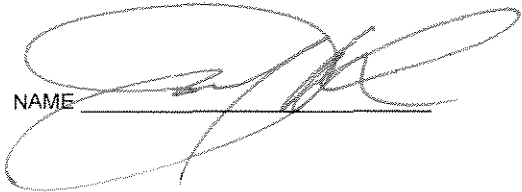
## FG RULE 290

The only operation that is currently subject to Rule 290 at the facility is EU-SOLVENT-CLEAN. This emission unit contains the solvent that is used to clean the coating spreading knives, mixing paddles, and other coated parts at the facility.

*The appropriate records are being kept for this EU.*

Based on observations made at the time of the inspection and subsequent records reviewed, Worthen is in non-compliance with the water-based coating material usage limits for EU-SOLVENT-COAT as well as the record-keeping requirements for the use of clean-up solvents as detailed in ROP No. MI-ROP-B4043-2010a. A VN will be issued and missing records will be requested. If records indicate non-compliance with other existing limits, an additional VN will be issued.

NAME



DATE

12.23.14

SUPERVISOR

PAB