



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 20, 2021

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

SRN: P0634, Kent County

Dear Mr. Worthen:

VIOLATION NOTICE

On September 9, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed a stack test conducted at Worthen Coated Fabrics located at 1125 41st Street SE, Grand Rapids, Michigan. The purpose of this stack test 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 stack test AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-FabricCoating	MI-ROP-P0634-2017, EU-FabricCoating, Special Condition IV.1	Failure to maintain the RTO destruction efficiency at 98%.
EU-FabricCoating	Rule 910	Failure to operate the RTO in a satisfactory manner.
EU-FabricCoating	MI-ROP-P0634-2017, FG-0000, Special Condition I.2 and 40 CFR 63.4291(a), Table 1 to Subpart OOOO of Part 63	Failure to maintain a 98% overall control efficiency when operating the RTO.

On September 9 and September 16, 2021, the AQD observed operation of the fabric coating line while the regenerative thermal oxidizer (RTO) was not achieving a 98% destruction efficiency as required by ROP No. MI-ROP-P0634-2017 and the National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles found in 40 CFR Part 63, Subpart OOOO. Failure to achieve a 98% destruction efficiency constitutes a violation of the ROP, Rule 910 and 40 CFR Part 63, Subpart OOOO.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 11, 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 Lazzaro
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
Dr. Eduardo Olague, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE