

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GRETHER
DIRECTOR

August 26, 2016

Mr. Jack Hoffman Worthen Coated Fabrics 1125 41st Street SE Grand Rapids, Michigan 49512

SRN: P0634, Kent County

Dear Mr. Hoffman:

VIOLATION NOTICE

On July 13, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Worthen Coated Fabrics located at 1125 41st Street SE in Grand Rapids, Michigan. The purpose of the 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 Permit to Install (PTI) No. 151-15.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Fabric coating line (EUFabricCoating)	PTI No. 151-15, EUFabricCoating, Special Condition (SC) V.2.	The company is not maintaining an accurate record of coatings used in calculating mass volatile organic compound (VOC) emissions.
Fabric coating line (EUFabricCoating)	PTI No. 151-15, EUFabricCoating, SC V.4	The company is not recording the pressure differential between the PTE and adjacent areas in an acceptable format.
Fabric coating line (EUFabricCoating)	PTI No. 151-15, EUFabricCoating, SC V.5	The company is not recording the temperature of the RTO in a satisfactory manner or in an acceptable format.
Fabric coating line (FG-MACT-OOOO)	PTI No. 151-15, FG-MACT-OOOO, SC V.1	The company is not maintaining specific hazardous air pollutant (HAP) records including the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the organic HAP emission rate in kilogram per kilogram of solids applied.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 15, 2016 (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.

If Worthen Coated Fabrics believes the above observations or statements are inaccurate or do not constitute a violation 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 the facility. 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,

David L. Morgan

Environmental Quality Analyst

Air Quality Division 616-356-0009

cc: Ms. Heidi Hollenbach, DEQ

cc/via email: Mr. Roy Davis, Worthen Coating Fabrics

Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Mr. Chris Ethridge, DEQ Mr. Thomas Hess, DEQ