



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

June 26, 2024

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

SRN: P0634, Kent County

Dear Frederick P. Worthen III:

VIOLATION NOTICE

On May 30, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Worthen Coated Fabrics located at 1125 41st Street, Grand Rapids, Michigan. The purpose of this 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 Renewable Operating Permit (ROP) number MI-ROP-P0634-2023 and Consent Order AQD number 2022-15.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Fabric coating line	MI-ROP-P0634-2023, FG-MACT-OOOO, Special Condition VI.9 and 40 CFR 63.4342(c)(2)	Failure to properly calculate emissions.
Fabric coating line	MI-ROP-P0634-2023, FG-MACT-OOOO, Special Condition III.4 and 40 CFR 63.4292(b)	Failure to properly implement an adequate site-specific monitoring plan.
Fabric coating line	MI-ROP-P0634-2023, EU-FabricCoating, Special Condition V.1	Failure to utilize Method 24 data in recordkeeping.

During the records review, AQD staff identified that Worthen Coated Fabrics had not correctly calculated emissions pursuant to the National Emission Standards for Hazardous Air Pollutants (NESHAP): Printing, Coating, and Dyeing of Fabrics and Other Textiles, found in 40 Code of Federal Regulations (CFR) Part 63, Subpart OOOO. This is a violation of both 40 CFR Part 63, Subpart OOOO, and MI-ROP-P0364-2023. Based on the timeline of compliance correspondence with the company, this violation was identified prior to the ROP Semi-Annual Report submittal, however, it was not included in the certified deviation report.

Additionally, upon request and review, the AQD found that the site-specific monitoring plan required by the NESHAP was inadequate as it relates to the monitoring of the permanent total enclosures (PTE). This is a violation of 40 CFR Part 63, Subpart OOOO, and ROP number MI-ROP-P0364-2023.

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During the 2023 inspection, the AOD noted that Worthen Coated Fabrics had not been utilizing the Method 24 coating Volatile Organic Compound (VOC) content data in the emissions calculation spreadsheet, however, since most values were lower than the reported information, a correction was requested. The permit states that if the values differ, the permittee shall use the Method 24 results to determine compliance. During a review of the most recent test data, it was noted that on several occasions, the VOC content of the sampled coatings was higher than the values in the spreadsheet. As such, this is a violation of EU-FabricCoating, Special Condition V.1.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 17, 2024 (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 April Lazzaro at EGLE, AOD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 or LazzaroA1@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AOD, 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: Tony Harb, Worthen Coated Fabrics
Kristi Koetje, Worthen Coated Fabrics
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE