



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 17, 2023

Frederick Worthen III
Worthen Coated Fabrics
1125 41st Street SE
Grand Rapids, Michigan 49508

SRN: P0634, Kent County

Dear Frederick Worthen III:

VIOLATION NOTICE

On August 2, 2023, 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 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 process	MI-ROP-P0634-2023, EU-Fabric Coating, Special Condition No. III.4 and Paragraph 9(A)(1) of Consent Order AQD No. 2022-15	Pressure drop readings greater than 0.007 inches of water pressure differential between the Permanent Total Enclosure and the adjacent area on a continuous basis on at least 61 occasions, lasting from minutes to hours at a time.
Fabric coating process	MI-ROP-P0634-2023, EU-FabricCoating, Special Condition No. IV.3; FG-NSPS-VVV, Special Condition No. IV.1; and Paragraph 9(A)(1) and (2), Consent Order AQD No. 2022-15	Failure to operate EU-FabricCoating as a Permanent Total Enclosure.
Fabric coating process	MI-ROP-P0634-2023, FG-MACT-OOOO, Special Condition III.4	Failure to meet the operating limits established in 40 CFR 63.4292.
Coating mix preparation equipment	MI-ROP-P0634-2023, FG-NSPS-VVV, Special Condition No. III.2 and Paragraph 9(A)(2), Consent Order AQD No. 2022-15	Failure to maintain 95% control efficiency during 459 coating batches between January 1, 2023 and August 31, 2023.

Process Description	Rule/Permit Condition Violated	Comments
Coating mix preparation equipment	MI-ROP-P0634-2023, FG-NSPS-VVV, Special Condition No. IV.4 and 40 CFR 60.743(c)(3&4), Paragraph 9(A)(2), Consent Order AQD No. 2022-15	Failure to vent coating mix preparation equipment to a 95% efficient control device.
Coating mix preparation equipment	MI-ROP-P0634-2023, FG-NSPS-VVV, Special Condition No. VII.7 and Paragraph 9(A)(2), Consent Order AQD No. 2022-15	Failure to submit a timely quarterly report.

During the compliance inspection records review and a review of the quarterly and semi-annual reports, violations of MI-ROP-P0634-2023 and Consent Order AQD No. 2022-15 were identified. Violations related to the 95% destruction efficiency of the coating mix preparation room carbon absorption system were self-reported, however, additional violations were identified by the AQD.

Worthen Coated Fabrics failed to identify that differential pressure readings of the Permanent Total Enclosure were greater than 0.007 inches H₂O on numerous occasions. This is a violation of the permit, the National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles, 40 CFR Part 63, Subpart OOOO, the New Source Performance Standards for Polymeric Coating of Supporting Substrates Facilities, 40 CFR Part 60, Subpart VVV and Consent Order AQD No. 2022-15.

In the first half 2023 ROP semi-annual deviation report, Worthen Coated Fabrics stated that the carbon adsorption system fan was not operating continuously, which caused the control efficiency to be less than 95%. The corrective action included running the fan continuously, yet the carbon absorption system problem occurred for six consecutive months and continued to occur up to and including the date of the compliance inspection which was conducted on August 2, 2023. The corrective action listed on the ROP semi-annual monitoring and deviation report for January 1 - June 30, 2023, is not acceptable. Additionally, the semi-annual deviation report did not include the deviations that occurred for the period of January 1 – March 31, 2023. The report should be amended and resubmitted.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 7, 2023 (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.

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Please submit the written response to April Lazzaro at EGLE, AQD, 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, 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,

A handwritten signature in black ink that reads "April Lazzaro". The signature is written in a cursive, flowing style.

April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Kristi Koetje, Worthen Coated Fabrics
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE