



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

January 2, 2019

Mr. Mike Craven  
Morbark Holdings Group, LLC  
8507 South Winn Road  
Winn, Michigan 48896

SRN: N1701, Isabella County

Dear Mr. Craven:

**VIOLATION NOTICE**

On August 29, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Morbark Holdings Group, LLC (Morbark located at 8507 South Winn Rd, Winn, Michigan). The purpose of this inspection was to determine Morbark's 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) numbers 511-89D and 138-15.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGBOILERS	PTI 138-15 VI.1	No gas usage records available
	PTI 138-15 VII.1	No notification
	PTI 138-15 IX.1	No evidence of anything being done for 40 CFR Part 63, Subpart JJJJ
FGCOATINGS (Three coating lines)	PTI 511-89D IV.2	No test caps available
	PTI 511-89D V.1	No VOC content testing
	PTI 511-89D VI.1	No records
	PTI 511-89D VI.3(a), (b), (c), & (d)	No data, records, or calculations
	PTI 511-89D VIII.2 & 3	Stacks for booths 2 and 3 had caps on them which did not permit unobstructed discharge
FGFACILITY	PTI 511-89D V.1	Hazardous Air Pollutant (HAP) content not determined
	PTI 511-89D VI.1	No records
	PTI 511-89D VI.2	No data, records, or calculations

	PTI 511-89D VI.3	No data, records, or calculations
	PTI 511-89D VI.4	No data, records, or calculations for HAPs
Metal pretreatment wash stations using an acid solution	Rule 201 (R 336.1201)	Exemption 285 2 I (iii) for pretreatment is not applicable due to acid solution. Facility has not examined other exemptions and has not applied for permit.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 23, 2019 (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 the DEQ, AQD, Saginaw Bay District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Morbark 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 Morbark. 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,



Ben Witkopp  
Environmental Engineer  
Air Quality Division  
989-894-6219

cc: Ms. Mary Ann Dolehanty, DEQ  
Dr. Eduardo Olaguer, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Mr. Chris Hare, DEQ