



MORBARK

8507 S. WINN RD | PO BOX 1000
WINN, MICHIGAN 48896 | (989) 866-2381 | F: (989) 866-2280 | www.morbark.com

April 30, 2019

DEQ-AQD

MAY 02 2019

SAGINAW BAY

Mr. Ben Witkopp
Environmental Engineer
Air Quality Division
MDEQ Saginaw Bay District office
401 Ketchum Street, Suite B
Bay City, MI 48708

Re: Response to Violation Notice Letter
Morbark Holdings Group, LLC., Winn, Mi. (SRN: N1701)

Mr. Witkopp,

Morbark Holdings Group, LLC presents this letter in response to the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) Violation Notice (VN) dated April 11, 2019. VN states Michigan Air Emissions Reporting System (MAERS) report exceeds the permit limit of 30 tons violating Permit to Install (PTI) No. 511-89D I 3. This VN also indicates Morbark has not followed through on its detailed written plan dated January 23, 2019 to, in part; bring our facility into compliance with PTI No. 511-89D VI 3 and PTI 511-89D VIII. 2 & 3.

Process Description	Rule/Permit Condition Violated	Comments
FGFACILITY	PTI 511-89D I 3	Michigan Air Emissions Reporting System (MAERS) submittal indicates 35 tons of voe vs limit of 30. No permit modification application has been received.
FGCOATINGS (Three coating lines)	PTI 511-89D VI 3	Actual records of material usage and subsequent emissions were still not being kept for each individual booth as of March 25, 2019.
FG COATINGS	PTI 511-89D VIII. 2 & 3	Rain caps were to be removed by Feb 16, 2019 and DEQ notified. No notification was received.



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This letter provides the following requested violation information:

- Alleged violation dates
- Cause, duration and explanation of the alleged violations
- Whether the alleged violations are ongoing
- Action summary of steps taken and/or proposed corrective actions to be taken
- Dates of corrective actions
- Steps taken to prevent reoccurrence

FGFACILITY

PTI 511-89D I 3 – MAERS VOC Limit

Morbark Holdings Group, LLC has reported via the 2018 MAERS filing on March 15, 2019 that it exceeded its VOC emissions limit by 5 tons. The company self-reported this finding to Ben Witkopp. There were two primary causes for this overage: 1. Morbark Holdings Group, LLC experienced an increase in production during 2018 that also increased usage in the paint operations. 2. The current paint application system is not efficient and requires a higher volatile organic compound (VOC) thinner to prep the paint for an optimal spraying condition. Morbark Holding Group, LLC is currently investigating upgrading its current painting system in the industrial booth to one will reduce paint usage, as well as allowing them to spray the paint thicker, which will reduce high VOC thinners usage. Morbark Holdings Group, LLC has also contracted Fishbeck, Thompson, Carr & Huber, Inc. FTCH to consult and prepare a permit modification on our behalf. Morbark Holdings Group, LLC will provide a permit modification proposal to the MDEQ within 60 days of the date of this letter as business is also expected to continue to grow.

FGCOATINGS (Three coating lines)

PTI 511-89D VI 3

Morbark Holdings Group, LLC was keeping usage records per booth but not in the proper format or breakdown as required by March 25, 2019. The company's Facilities Manager (Mike) suffered a very serious medical event at work on February 12. He has not returned. Mike was responsible for all environmental matters and sole stakeholder of MAERS reporting and environmental compliance. He was handling all aspects of the response. This event occurred at a point in time that caused a lapse in oversight in the matter of VN dated January 2, 2019. Since then we have worked closely with FTCH and have assigned environmental responsibilities to



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safety and paint supervisors going forward. FTCH created an emissions monitoring system that Morbark Holdings Group, LLC has been using since April 1 and puts us in compliance with the required material usage tracking. This system monitors the monthly material usage per paint booth and performs calculation based on the usages to determine compliance with the emission and material limits in PTI No. 511-89D. As of April 1, we are currently keeping and monitoring paint/product usage per paint booth using the spreadsheet created for us by FTCH. This will be used going forward.

FG COATINGS

PTI 511-89D VIII. 2 & 3

Morbark Holdings Group, LLC did remove rain caps on Saturday, February 16, 2019 on booths 2 & 3 as communicated to Ben Witkopp in the Response to VN dated January 23, 2019 but did not notify the MDEQ of the removal as this notification again was to be performed by Mike. The Confirmation, pictures and invoice are included with this response. These stacks were in compliance as of Feb 16, 2019.

Morbark Holdings Group, LLC is committed to working with the MDEQ AQD to comply with all violations in this VN. We feel we have positioned ourselves well going forward. Please contact me if you require any additional information

Regards,

Morbark Holdings Group, LLC

Tim Wentworth
Safety Coordinator

Attachments

By email and UPS/FedEx – confirmation of delivery

Cc/att: Ms. Jenine Camilleri – MDEQ (UPS/FedEx only)

Mr. Ben Witkopp – MDEQ AQD (UPS/FedEx only)

Mr. Timothy J. Swainston – FTC&H (email only)



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Mr. Garrett Bates – Morbark (email only)

Mr. Kevin Cotter – Morbark (email only)

Mr. Ben Young – Morbark (email only)

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