

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

N170145976

FACILITY: Morbark Holdings Group, LLC		SRN / ID: N1701
LOCATION: 8507 S WINN RD, WINN		DISTRICT: Saginaw Bay
CITY: WINN		COUNTY: ISABELLA
CONTACT: Mike Craven		ACTIVITY DATE: 08/29/2018
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: <del>MINOR</del> syn minor opt-out
SUBJECT: Facility inspection		
RESOLVED COMPLAINTS:		

Ben Witkopp of the Michigan Department of Environmental Quality - Air Quality Division (MDEQ-AQD) met with Mike Craven and Tim Wentworth of Morbark on August 29, 2018. Mike is the Facilities Manager while Tim is head of Health and Safety. Morbark is located in Isabella County at 8507 South Winn Rd which is west of Shepard and south of Mt Pleasant. The company has been in business since 1957 and manufactures a line of heavy equipment for use in the forestry, sawmill, biomass, rental, and tree care markets. They produce flails, tree chippers, brush chippers, horizontal and tub grinders etc. Chippers comprise the bulk of the production. Operations consist largely of welding, cutting, fabrication, assembly, and painting. The facility has a number of active permits though only two of them appear to concern processes currently in operation. I explained the concept of voiding active permits which no longer reflect operations and/or equipment at the facility. Those permits are 680-87, 955-92, and 105-10.

Permit 511-89D covers the painting operations and was most recently revised in 2017. Permit 138-15 covers two natural gas fired boilers. I discussed the existence of the booklet which lists the recent changes to permit exemptions and told Mike I would send the web link to him. We also discussed rule 278 and the toxics rules when exemptions are being considered or changes are being contemplated. Rule 278a was also discussed wherein AQD could request the company provide the exemption being used and the basis for it.

The company was given the choice of permit and records review or doing a walk around to check equipment. They wanted to go over the permits first. We reviewed permit 138-15 for two identical gas fired boilers first. I asked how the units were operated, suspecting both units are likely not operated at the same time given that the units are identical. Mike confirmed the units are run alternately. The permit has a requirement of max heat input capacity of 11.7 MMBTU per hour, gas usage records, a notification requirement, and area source MACT. Mike could not provide any evidence of a notification. Gas records consisted of a printout from accounting of the cost of gas involved. Mike had sheets of numbers but no units associated with them let alone what they represented e.g. just boilers, production plant usage, or facility usage. Nowhere was a 12 month rolling time period record evident. There also was no evidence of anything being done concerning 40 CFR 63 Subpart JJJJJ. These are all violations of permit 138-15.

Permit 511-89D covers the three coating operations. The permit has requirements for high volume, low pressure (HVLP) spray equipment or comparable. Mike said they were using comparable guns and provided copies of the gun information. The permit also has requirements for determining volatile organic compounds (VOC) content using Method 24 unless prior written approval is given. Mike confirmed Method 24 was not being used. I shared an email I sent to Mike on Feb 15, 2017 which was 5 days after permit issuance pointing out that specific requirement. The only usage records being kept were "totals" according to Mike. There weren't any units or what constituted the "totals." There weren't any emissions calculations.

The second portion of the permit concerns the entire facility. It contains opt-out limits for hazardous air pollutants (HAPs) on an individual and aggregate basis as well as VOC limits. As the result of a toxics review done during permit review there were chemical content and usage limits for two specific chemicals. The chemicals of concern were ethylbenzene and methyl isobutyl ketone. Mike was very forthcoming in revealing there were absolutely no records being kept which the permit required.

We then went into the production area to check the boilers, potential parts cleaners, and spray booths. The boilers were both Hurst Model S5 G 350 60W. One had serial number S1750 60W 4 while the other had the same number but with a 3 at the end. They were rated at a minimum of 2.1 and a maximum of 14.7 MMBTU per hour input. The 14.7 is higher than the 11.7 stated in the permit and the

difference needed additional investigation. Stack heights appeared correct and no loss style stacks were employed.

A parts cleaner was checked and was found to use OzzyJuice. It was not heated and the lid was closed. The safety data sheet was checked and the material was found to have a vapor pressure of less than 0.1 mm Hg and less than 0.1% VOC. Mike showed me the mat that was placed above the reservoir. Information on the mat was nearby and it claims to contain microbes which then accelerate decomposition of materials being washed through the mat and into the reservoir. Since organic solvents were not in use, rule 707 governing sources of VOC, does not apply.

We then went to the painting area which is located in the southern portion of the facility. Parts to be painted are racked, washed, allowed to air dry, and then painted. The painted parts are air dried.

The wash area near one booth was checked and found to be using a solution of LincPhos 3465 plus. The material contains phosphoric acid therefore rule 285 2 i (iii) permit exemption would not be applicable. Mike was urged to examine other potential exemptions in preparation for a violation notice response or he could apply for a permit. The LincPhos is used at less than a 3% concentration per Tim. The solution is heated to 160 degrees f.

Parts to be painted are trailered or toled in. Two sets of air filters on one end are used for incoming air and two sets are used for discharge air. Each set of filter area is comprised of two filters. The initial discharge filters are changed on an as needed basis to keep the second layer cleaner. When the presence of pressure drop gauges on the booths was discussed with a paint operations supervisor he stated they really weren't relied upon and that the filters are changed weekly regardless. He didn't want to rely on gauges as he said they could have performance issues prior to the gauge indicating filter changes were needed.

We then checked the washer settings on the unit near a second booth. The Supervisor showed me that 1.2% solution of LincPhos and water was being used. All booths use Binks Global Electronic Mix (GEM) Solution to meter paint and catalyst. The materials are used as received so no manual mixing occurs. I asked the supervisor to see the type of spray guns they use. We went to the supply area and he showed me the HVLP spray guns. They were not the "comparable" type that Mike said were being used. Since HVLP guns were used I inquired about the presence of test caps. None were available, which is another violation. When I asked about the paint volumes being supplied to Mike the supervisor confirmed they were just totals. I explained the usage had to be per booth and encouraged he and Mike to sit down and review the permit together to be sure the requirements are being met. The supervisor said he doesn't trust the metering of cc's used at the gun tip at this point and is just manually measuring usage. I assured him this was fine. Given the immensity of the building only one of the paint booth stacks could be viewed. The 4 ft diameter and 30 ft height requirement appeared correct. I asked Mike to access the roof at some point and provide a photo of the other stacks.

Lastly, I inquired about any emergency generators. Mike said they had a small gas fired unit that was designated for the business office area. That area could be operational but the production area would be down in the event of a power outage. It did not appear anything was being done specifically for the area source MACT. Since MDEQ-AQD does not have delegation for the area source MACT I will just make Mike aware of the federal regulation via email.

Afterward, the boiler size situation was checked. Review of the material submitted indicated the permit engineer likely read the incorrect row of data and then used a heat input of 11.7 MMBTU per hr rather than 14.7. This was discussed with permit engineer, John Vial, who said he would look into it. I told him as far as I was concerned it could be handled by AQD as a supplemental revision or possibly an administrative amendment if the observation proved correct. John agreed.

Mike provided a photo of the other paint booth stacks as requested. The stacks featured rain caps and were not unobstructed vertically upwards as required by the permit conditions. The stacks were also 24 inch diameter versus the 22 and 16 inch stated in the permit.

Based upon the near total absence of record keeping and lack of compliance with other requirements a

lengthy violation notice is in order.

NAME Mr. [Signature]

DATE 9-28-18

SUPERVISOR C. [Signature]