



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

April 11, 2019

Mr. Tim Wentworth  
Morbark Holdings Group, LLC  
8507 South Winn Road  
PO Box 1000  
Winn, Michigan 48896

SRN: N1701, Isabella County

Dear Mr. Wentworth:

**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 Road, 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.

On January 2, 2019, a violation notice was sent subsequent to the inspection. A response to the notice was received January 23, 2019, offering explanations and detailing a plan to bring the facility into compliance. The response, in part, stated recordkeeping for the coating lines would be updated completely by March 25, 2019. Also, rain caps were to be removed and replaced with no-loss stacks by February 16, 2019 and the DEQ notified of project completion.

Review of the information provided by Morbark indicates the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFACILITY	PTI 511-89D I 3	Michigan Air Emissions Reporting System (MAERS) submittal indicates 35 tons of VOC 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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 2, 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 has been extended to me. 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