DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

P129163328

FACILITY: BANDIT INDUSTRIES INC		SRN / ID: P1291
LOCATION: NORTH WINN MANUFACTURING FACILITY, WINN		DISTRICT: Bay City
CITY: WINN		COUNTY: ISABELLA
CONTACT:		ACTIVITY DATE: 06/09/2022
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: Facility Inspection		
RESOLVED COMPLAINTS:		

Ben Witkopp of the Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division (AQD) visited Bandit Industries location known as their North Winn Manufacturing Facility on June 9, 2022. It is located at 3372 W. Walton Rd., in Winn Michigan. The facility did not have any information in AQD records. Bandit's primary production facility and company headquarters are located approximately three and one half miles west northwest of the Winn facility. That site has experience with AQD regulations and permitting. Bandit manufactures very large horizontal grinders and whole tree chippers, as well as stump grinders and hand fed chippers. Specialized equipment for forestry industry use is also part of their product line up.

The Winn facility runs east west parallel to Walton Rd. Several numbered / identified large bay doors are visible on the south side of the building. A parking lot is located in front of the south east side of the facility. A fork truck driver was approached in order to find a facility contact. I was taken to a parts area manager who then took me to an office area mid way through the facility along the north side. The facility manager was not there so among those staff present Mr. Jeremy Loomis provided a tour of the faciity.

The majority of the facility space is committed to fabricating metal parts for use in assembly and production. Cutting, grinding, and welding (solid wire MIG) etc. are the primary operations. The activities are exempt from AQD permitting requirements via rule 285 (2)(i) for the welding and 285 (2)(l)(vi) for the other metal working operations. The emissions are released into the general in plant environment without controls.

The west end of the facility is used to clean and paint their various products. The cleaning operation is similar to the one permitted at the company's main facility in Remus Michigan. LincPhos 4465 plus is mixed in water at an approximately 2% concentration. The LincPhos does contain phosphoric acid. The solution is sprayed onto the equipment and allowed to air dry prior to painting. Rule 285 (2) (l)(iii) exempts equipment for surface preparation of metals, except for acid solutions. Therefore the surface prep operation is in violation of Rule 201 unless a permit exemption is met or an air use permit is obtained. The spent solution runs down a floor drain and reportedly into a 1,000 gallon tank below. There was said to be another 1,000 gallon tank to the north of the painting area.

Painting is conducted in a down draft booth which exhausts along the bottom of both the east and west sides. Both sides have individual stacks which discharge vertically upwards. The stacks have no loss style rain guards on them. Filters were in place. Electrostatic hand held spray equipment is used. No painting was occurring at the time though the painter was preparing to conduct some painting in the

afternoon. The paint is mixed along the the outside of the booths east wall. The painter was dutifully keeping track of paint usage each day. The usages are then provided to the main facility for record keeping purposes. Based on the relatively limited painting being stated, the operation could likely meet Rule 287 (2)(c) which exempts a surface coating line if coating usage is less than 200 gallons per month, dry filter or water wash controls are installed, and monthly coating usage records for the most recent two year period are available. A new solvent reclaimer unit from Safety Kleen was in the paint area. The painter said he had only used it twice. It is felt Rule 285 (2)(u) which exempts solvent distillation and antifreeze reclamation equipment that has a rated batch capacity of not more than 55 gallons is likely applicable. The unit was clearly less than 55 gallons in size.

North of the painting area, in a separate room, there was indeed a large tank. Jeremy, said the tank underground can be pumped into this area. Though called a burner at this facility, the operation is basically what is termed an evaporator at the Remus facility. The function is to slowly evaporate water while reclaiming oils etc. A single stack provides a vertical discharge of exhaust. This area should be deemed part of the overall cleaning process.

Final touches / assembly occurs at the far north end of the west portion of the facility. Initial parts receiving is located on the east end of the facility, with parts / inventory just to the west of it. No cold cleaners were found in the facility.

I then proceeded to the Remus facility and met with Mr. Jason Dawes, the Facilities Manager. Observations made at the Winn facility were discussed with Jason. Copies of paint usage records for the Winn facility were provided for 2020 and 2021. The highest amount found was 147 gallons for Dec 2020 (though the row said 2021). I explained a violation notice would be provided in the future noting that the two options available for the cleaning process consist of obtaining an air use permit or demonstrating use of an appropraite permit exemption. He said he would have his consultant, Mr. Bruce Connell of Environmental Partners Inc., look into the specifics.

The facility is considered to be in non-complaince at this time.

NAME B. Lithopp DATE 7-1-22 SUPERVISOR C. Kane