

DEQ-AQD

FEB 10 2020

SAGINAW BAY

February 5, 2020

Mr. Ben Witkopp, Environmental Engineer
EGLE, AQD Bay City District Office
401 Ketchum Street, Suite B
Bay City, Michigan 48709

Re: Response to Violation Notice
Bandit Industries (SRN: N5223)

Dear Mr. Witkopp:

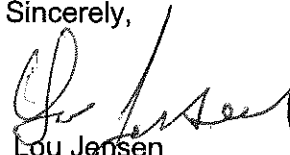
This letter is in response to the Violation Notice from EGLE, dated January 30, 2020. During our preparation of the 2019 MAERS report, we discovered that the stack parameters for our three paint booths did not match the recently approved air permit (PTI #387-93A). In particular, we noted that flexible group FGCOATING only identified one stack for each booth, when in fact each booth is equipped with two stacks. Upon further review, we noted that the permit application for PTI #387-93A only identified one stack for booth1 instead of two and that the actual stack height for both stacks are shorter (34' 2" above grade) than the height of the single stack (40') listed in our application and the approved permit.

The addition of a second stack to booth1 appears to have occurred in the time frame of September to December 2018, about the time of the permit application. While we were aware of the change we failed to verify that the facility stack drawing had been properly updated before incorporating it into the permit application. Second, it appears that during the installation we neglected to inform the contractor of a stack height requirement or verify that the final product complied with permit height restrictions. Finally, when reviewing the draft permit, we failed to notice the listing of only one stack for each booth.

Upon noting the error, our first response was to notify you (January 20, 2020) in order to 1) bring the errors to your attention, and 2) determine a plan for correcting the errors. The course that was selected included submitting a permit modification that addresses both the administrative errors by the permit engineer as well as our own oversight. We have already directed our consultant, Environmental Partners, to assemble a permit modification application, which we plan to deliver by February 14, 2020.

We sincerely apologize for our omission of this information during the recent permit activity, as it was purely unintentional. Should you have any questions regarding the above outlined events, please contact me either by e-mail at Ljensen@banditchippers.com or by telephone at 989-621-3134

Sincerely,


Lou Jensen
Facilities Manager
Bandit Industries

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