

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

N522350432

FACILITY: Bandit Industries		SRN / ID: N5223
LOCATION: 6750 MILLBROOK RD, REMUS		DISTRICT: Saginaw Bay
CITY: REMUS		COUNTY: ISABELLA
CONTACT: Jason Daws		ACTIVITY DATE: 07/12/2019
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR SYN MINOR
SUBJECT: New permit issued - inspection		
RESOLVED COMPLAINTS:		

Ben Witkopp of the Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division met with Jason Daws of Bandit Industries. The company makes very large horizontal grinders and whole tree chippers, as well as stump grinders and hand fed chippers.

The facility was inspected in 2017. It had an air permit however required records were not available for the two coating lines. Additionally a third, larger spray booth was installed without an air permit. A surface prep spray operation was also found to have been installed without a permit. A violation notice was issued. The company provided some usage information which showed that no permit limits had been exceeded. The company also hired a consultant, Bruce Connell, of Environmental Partners Inc, to prepare a permit application. The resulting permit, 387-93A, covers all three coating lines and the surface prep spray operation. Additionally, it provides opt -out limits for hazardous air pollutants (HAPs). The rest of the facility is comprised of exempt operations such as welding, grinding, etc.

The focus of the inspection was the surface spray prep operation and the three coating lines. The spray booths had filters in place. Air assisted airless and electrostatic spray guns were available application equipment as specified in the permit. All filters were in place. Stacks appeared to be the approximate diameters & heights. They allowed for unobstructed upward discharge. The coatings, with the exception of primer, are supplied through an automated mixing system.

Jason provided some information as records. He said the prep solution usage is tracked by changeout of 55 gallon drums. Eight drums had been used in 2019 through June. Usage at this rate would be well under the 3,960 gallons on a 12 month rolling time period. It should be noted there is not a system in place for tracking permit required actual usage.

Jason then provided sheets which were stated as being pounds of VOC emissions from the coating lines. The validity of the numbers was questionable. The tracking of material usage per line as required by permit was not evident. Jason was told to provide the records required by permit.

Jason provided records, however, they did not match what was first provided. They weren't totals and were on a per line basis. Also, there were no records based on a 12 month rolling time period. The following units were in pounds,

Month	First	Second
Feb	1,825	1,820
Mar	2,234	1,726
Apr	2,620	1,739
Jun	2,338	1,621

There were obviously rather large discrepancies with the exception of Feb. Jason then said he found out the first values provided were usages, not emissions. That statement then clearly made the Feb values suspect as they were essentially the same. It also did little to provide confidence in the other information provided. Records on a 12 month rolling time period were still not provided. Jason said he

planned on starting the 12 month rolling time period records in Feb 2020 as they received their permit in Feb 2019. I explained records are to be used to show compliance and also to be proactive so limits are not exceeded. One could easily go over a 12 month rolling limit in several months. 12 months do not have to pass for the limit to be exceeded. I also corrected the claim that the permit was issued in Feb 2019. The cover page of the permit is dated Dec 27, 2018. The company also received an email on the date of issuance saying the permit was in effect.

Jason then attempted to provide some 12 month rolling values. January still was not included. There wasn't any tabulation for total HAPs.

Though records were clearly not being kept since the permit was issued, the company did finally hire a consultant. The consultant was the same person who prepared the permit application, Bruce Connell. Bruce subsequently quickly analyzed existing usage information and worked with the person responsible for the coating lines. Bruce then developed spreadsheets which presented usage and calculated resulting emissions. The information was provided August 5, 2019. The records complied with all permit requirements and no limit violations were found.

Permit requirements stipulate the records are to be available upon request. Several attempts at providing records were made before Bruce was hired and rectified the situation. A violation notice was issued for records not being kept for the 6 months after permit issuance.

It should be emphasized this was not the first time the facility did not have records. The 2017 inspection found the company did not have any records required by permit 387-93 which was in effect at the time. Additionally, the company installed a third coating line without first obtaining a permit to install. A violation notice was sent at the time. Even after having received a violation notice, the company once again failed to have records required by the new permit 387-93A.

NAME B. Winters

DATE 9-18-19

SUPERVISOR C. Stone