

DEQ-AQD

AUG 22 2019

SAGINAW BAY

EGLE, AQD, Bay City District
401 Ketchum Street, Suite B
Bay City, Michigan 48708

This letter is in response to the Violation Notice from EGLE, dated August 6, 2019. During an EGLE visit to Bandit Industries on July 12, 2019 it was determined that the on-site record keeping program was not meeting the requirements of the most recent air permit (PTI #387-93A). When requested to see records (paint usage, emission calculations and 12 month rolling sums), our documentation efforts were not readily available. The paint team had been recording daily usage data, but that data had not been properly quality assured. In addition, the record keeping spreadsheet being used had not been updated to meet the new permit requirements. The cause of these violations was due to our lack of fully understanding the recordkeeping portions of the permit and the deficiency in the tools we had in place. We were keeping a daily and monthly usage record, but the records were not being compiled into a 12 month rolling total of gallons, VOCs or HAPs for the FGcoating, FGmetalparts, FGfacility or gal usage for the EUpretreat section. At the Department's suggestion we did reach out to our environmental consultant, who assisted in reviewing our data collection process, emission calculation spreadsheet, and making corrections to bring the record keeping into compliance with the permit conditions. We have since updated the monthly reports for the months of January 1, 2019 through July 31, 2019, using the revised spreadsheet. As part of this process we have identified some failings on our part to properly inform our staff of the seriousness in maintaining proper records. We have since made some personnel changes in our paint department and we have a class for all personnel involved scheduled for August 20, 2019. So everyone can fully understand the conditions of the permit.

Finally, we have requested our consultant, Environmental Partners, to providing a review of our records once a quarter for the next 12 months (4 reviews) to ensure that we are following the necessary procedures. We are sincere in our apologies for our past lack of due diligence in reporting our emissions and pledge to improving our emissions and pledge to improving our documentation efforts on a going forward basis.

Sincerely,



Lou Jensen
Facilities Manager
Bandit Industries