

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

N522340702

FACILITY: PAINT CHIP INC	<i>Bandit Industries</i>	SRN / ID: N5223
LOCATION: 6750 MILLBROOK RD, REMUS		DISTRICT: Saginaw Bay
CITY: REMUS		COUNTY: ISABELLA
CONTACT: Louie Jensen, Facilities Manager		ACTIVITY DATE: 05/31/2017
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection		
RESOLVED COMPLAINTS:		

Ben Witkopp of the Michigan Department of Environmental Quality - Air Quality Division (MDEQ-AQD) met with representatives of Bandit Industries. Staff met with Tim Lannen (Safety Director) and Louie Jensen (Facilities Manager). Bandit primarily makes stump grinders and hand fed wood chippers as well as extremely large horizontal grinders and whole tree chippers.

AQD files and permitting had the facility name listed as Paint Chip Inc. with state registration number N5223. Permit 387-93 was issued following an inspection. The permit covered two paint booths and a purge / cleaning operation. The paint booths had a combined limit of 7.2 tons of volatile organic compounds (VOC) per year while the purge / clean up had a limit of 7.5 tons per year.

The operations are spread through several buildings north of Millbrook Road. One horseshoe shaped building is located on the south side. It is used primarily for parts storage as well as shipping. Some solvents were stored there such as Splatter Mist and Safe - n -Clean. The materials are very similar in nature and used sporadically as degreasing agents during various manufacturing steps. They help make better weld connections by cleaning grease / oil from the metal being welded.

North of Millbrook Road there is a small building with several sections. There is a maintenance and office area on the south end. Continuing north there is some production welding and R & D work. A cold cleaner using diesel was in the area. It didn't have the operating instructions required by rule 707. The north end of the building is the area where the wiring assemblies are made.

Proceeding west, the first building north of Millbrook is dedicated for welding the framework for the large self propelled units. The next building north is used for welding trailer framework for those type models. The next building to the west is used for welding hand feed chippers. The various welding operations would most likely be exempt from permitting by Rule 285(2)(i).

North of the aforementioned production lies a grass airstrip. To the west there is a paved area running north and south which connects the production building area to the final painting operation.

The first building north of the airstrip serves several purposes including assembly and re-work. The west end is primarily used for storage. The middle portion contains some hydraulic fluid and diesel. The east end is used for large rebuild work. The company takes all sorts of equipment and brands as trade-in etc., then repairs and rebuilds them for subsequent sale.

The northern most building is dedicated to painting the final products. The facility does have air use permit 387-93 which covered two spray booths. However, there are a total of three booths present toward the west end of the building. The booths use electrostatic spray equipment and the paint, with the exception of the primer, is supplied through an automated mixing system. The primer is mixed in a small paint room located north of the booths. The equipment is prepped for paint in an area west of the booths. A solution of 2% phosphoric acid warm water is sprayed onto the equipment and allowed to air dry prior to painting. Rule 285 (2) (I)(iii) exempts equipment for surface preparation of metals, except for acid solutions. Therefore the surface prep operation is in violation of Rule 201.

The northern most booth is a simple classic straight down-draft booth. The middle booth, in addition to being down draft also has some exhaust along the sides near the floor. The southern most booth is the largest and most recent. It is a classic straight down-draft booth. The booth is not permitted and is therefore in violation of Rule 201. No painting was occurring at time. The booths had filters in place. No cure ovens are used.



Paints and cleanup solvents are placed in small stills by, and in, the paint room. East of the paint room are a couple of oil water separators and evaporator. The oil water separators allow oil to be reclaimed and the remaining water to be evaporated.

Paint / solvent usage records etc. that are required under permit 387-93 were unavailable which is a violation of special condition 19. The company was asked to provide what they could concerning overall paint and solvent usages. Both Tim and Louie were going on vacation and the person in charge of paint operations was going to be gone after that.

Eventually, the requested information was provided. For 2016 the following VOC amounts were reportedly emitted - north booth 7,248 pounds, middle booth 5,669 pounds, and the southern large booth 7,366 pounds. The informational sheets are attached. It appears the emissions for the two permitted booths are under the current limits.

The operation lends itself to the use of the general coating permit. However, there are violations of an existing permit and violations for installing a new booth without a permit. Additionally, the surface prep with the acid solution was never addressed in the existing permit. Therefore, the best approach may be to modify the existing permit to include the surface prep as well as the new booth while perhaps adding Hazardous Air Pollutants (HAPs) opt-out limits. The permit would then be all encompassing rather than having the existing permit, a general permit for the new booth, and then a HAPs out-out permit.

A Violation Notice is in order.

NAME *P. Zitzky*

DATE *2-12-18*

SUPERVISOR *C. Hale*