



Friday, March 1, 2019



To Whom it May Concern:

This is in response to the violation notice we received in regards to SRN #: P0254

Violations that occurred on December 18, 2018.

Violation 1: Condition VI.3.c:

We were not aware that we were required to keep record of the amounts of MEK that we reclaim. We have created and implemented a form that is to be filled out anytime MEK is reclaimed. We now include it on our living document which records all paint and VOC data. This data is entered into our living document biweekly.

Violation 2: Condition VI.3.d:

While our living document did not have the months separated out, they were being recorded in a way that indicted which month the products were used and VOC was emitted. We have now reformatted that document to show the calculated monthly VOC amounts for each product. This data is calculated on the first Tuesday of every month.

Violation 3: Condition VI.3.e:

We were not aware that we needed a rolling 12-month emission calculation. The data was on the living document as referenced in Violation 2, but was not calculated or showcased as a rolling 12-month view. We have now revised this document to include an entire worksheet with emissions for the last 12 months. This data is calculated on the first Tuesday of every month.

Please feel free to contact me if for any reason our corrective actions noted above do not meet the expectations of the DEQ. We have always strived to operate within regulations and we do apologize for any inconvenience we may have caused with these violations.

Sincerely,

Ashlyn Davenport

Ropes Courses, Inc.

ashlyn@ropescoursesinc.com

269-743-3885



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

January 22, 2019

January 23, 2019

Brian Conrad
Ropes Courses Incorporated
1300 Lincoln Road
Allegan, Michigan 49010

SRN: P0254, Allegan County

Dear Mr. Conrad:

VIOLATION NOTICE

On December 18, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Ropes Courses Incorporated located at 1300 Lincoln Road, Allegan, Michigan. The purpose of this inspection was to determine Ropes Courses Incorporated's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and

-- the conditions of Permit to Install (PTI) number 15-16;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Coating Line in the 1300 Lincoln Road building and 1291 Lincoln Road building	Permit No. 15-16 Special Condition VI.3.c	The facility is not keeping records of the amount of MEK that is being reclaimed from their purging and cleaning process of the coating line.
Coating Line in the 1300 Lincoln Road building and 1291 Lincoln Road building	Permit No. 15-16 Special Condition VI.3.d	The facility is not keeping monthly emission calculations of VOC emissions. The facility is keeping an annual emission calculation based on purchase records, but without the monthly emissions

		compliance with the 2000 lbs per month emission limit cannot be determined.
Coating Line in the 1300 Lincoln road building and 1291 Linconl Road building	Permit No. 15-16 Special Condition VI.3.e	The facility is not keeping a 12-month rolling VOC emission calculation. The facility only records the annual VOC emissions. The facility would appear to meet the 10 tons per year emission limit, but is not keeping the records in the required 12-month rolling format.

During this inspection, Ropes Courses Incorporated was unable to produce emission records.

This is a violation of (the recordkeeping and emission limitations) specified in Special Condition VI.3 of PTI number 15-16.

The conditions of PTI number 15-16 require recording of each gallon of coating, purge/clean-up solvent used and reclaimed. The conditions also require the monthly VOC and 12-month rolling VOC emissions calculations for each coating line. (e.g., maintenance of records, which shall be made available for review upon request by the AQD staff).

Enclosed is a copy of the above cited (rule/regulation).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 13, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

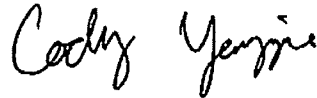
Please submit the written response to the DEQ, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Ropes Courses Incorporated believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Brian Conrad
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January 23, 2019

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Ropes Courses Incorporated. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Cody Yazzie
Environmental Engineer
Air Quality Division
269-567-3554

CY:ne

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Rex Lane, DEQ

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

P025447618

FACILITY: ROPES COURSES INCORPORATED		SRN / ID: P0254
LOCATION: 1300 LINCOLN ROAD, ALLEGAN		DISTRICT: Kalamazoo
CITY: ALLEGAN		COUNTY: ALLEGAN
CONTACT: Brian Conrad , Plant Manager		ACTIVITY DATE: 12/18/2018
STAFF: Cody Yazzie	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On December 18, 2018 Air Quality Division (AQD) staff (Cody Yazzie) arrived at 1300 Lincoln Road, Allegan, Michigan at 9:30 AM to conduct an unannounced air quality inspection of Ropes Course Incorporated (P0254) (hereafter Ropes Course). Staff made initial contact with the office receptionist and provided her with a business card and stated the purpose of the visit. Brad Ade was the facilities previous Air Quality contact but has left the company since the last inspection. Brain Conrad, Ropes Course, Plant Manager, is the new contact and arrived shortly thereafter and took staff to his office for further discussions.

Ropes Course has three facilities located in Allegan, Michigan. The Main offices and manufacturing facility is located at 1300 Lincoln street. Building #2 is located across the street at 1291 Lincoln street in Allegan. Both these buildings share the same P0254 SRN as they appear to be the same stationary source. The third facility is located at 248 River street in Allegan. The River street facility has a separate SRN and will have a separate inspection report.

Ropes Course manufactures high ropes courses and obstacles. The facility cuts, welds, and fabricates the metals used to construct the courses and then coats the metal with a variety of primer and paints. The facility has two general surface coating PTI's that are used to operate the surface coating lines.

Ropes Course was last inspected by the AQD on August 25, 2018 and was determined to be in Compliance at that time with General Surface Coating PTI No. 15-16. Staff asked, and Mr. Conrad stated that the facility does not have any emergency generators or boilers.

Mr. Conrad gave staff a tour of the facility. Required personal protective equipment are safety glasses and steel toe shoes. Staff observations and review of records provided during and following the inspection are summarized below:

Coating Line Main Facility:

The 1300 Lincoln street has two booths. The facility uses one booth for strictly priming and the other for painting. Both booths would be considered as a part of the same surface coating line and would need to meet the 2,000 pounds per month of VOC emission limit combined. The facility uses Methyl Ethyl Ketone (MEK) to purge and clean waste coatings from all coating applicators. The MEK used to purge and clean are reclaimed by Ropes Course. MEK is reclaimed in a 5 gallon solvent reclamation system. Coatings are applied using the same model spray gun. The model facility uses is Compact by Devilbiss. The spray gun and manual indicated that these spray guns are High Pressure Low Volume (HPLV) applicators. The filters are changed around 2-3 times per week. During the inspection the coating booth was in

operation, but Staff was able to observe the filters in the priming booth. The filters appeared to be good operational condition with no rips or tears.

Ropes Course will also apply a sand grit paint. This is the americoat primer with sand added to it. The facility applies this primer for parts that have surfaces that need increased friction to reduce slipping. This sand grit paint is applied with a roller. These emissions are being accounted for with purchase records.

The facility is keeping purchase records and calculating VOC emission from these purchase records on an annual basis. The facility is not calculating monthly VOC emissions records. Special Condition VI.3.d requires the calculations of monthly VOC emissions. The facility is currently not in compliance with this requirement. The facility is also not keeping record the MEK that is reclaimed. Special Conditions VI.3.c requires that the facility keep this information. Since the facility is not tracking this information Staff is not able to determine if the facility in compliance with 2,000 lbs/month emission limit for the coating line. The facility would appear to be able to comply with the limit with annual emission for 2018 amounting to 5.89 tons of VOC.

During the records review the facility did appear to be over reporting VOC emissions. The over reporting appeared to be minor. The facility was using a slightly higher VOC content value for the Devthane 379 Paint and the PSX paint that what was found to be in the SDS and product data sheet. Staff told the facility that these values sometimes change it would be beneficial if they were occasionally checked and updated to keep their records as accurate as possible.

Ropes Course is not keeping a 12-month rolling VOC emission calculation. The facility is calculating an annual VOC emission it is just not kept in the required 12 month rolling format. The annual emissions for are calculated to be 5.89 tons per year which is below the 10 tons per year limit. While the facility appears to be compliant with the VOC emission limit not tracking emissions in the 12-month rolling format leaves the facility in non-compliance with Special Condition VI.3.e.

Coating Line Building #2:

The 1291 Lincoln street has only one booth. During 2018 the facility only used 2K Urethane MEK in this coating line. This coating line usage is much lower than the 1300 Lincoln street building. Coatings are applied using the same model spray gun as the 1300 Lincoln building. The filters are changed around once per month. During the inspection the coating booth was not in operation. The filters appeared to be good operational condition with no rips or tears.

The facility is keeping purchase records and calculating VOC emission from these purchase records. The records that the facility provided showed that the VOC emissions totaled 0.265 tons per year. These records were only accounting for the MEK used in booth. adding the additional 2K Urethane paint calculated the VOC emissions to be 1.26 tons per year for this booth. This would appear to be well below the 2,000 lbs per month and 10 tons per year limit specified in the permit.

Blast Booth:

Ropes Course has a blast booth inside the 1300 Lincoln street building. The blast booth is used to prepare the metals for painting. The blast booth is equipped with a filtration system that vents inside the facility to a 55-gallon bin that collects waste. The blast booth appears to be exempt using Rule 285(2)(l)(vi)(B).

Metal Cutting and Welding:

The metal cutting and welding equipment are located in the 1300 Lincoln street building. The facility modifies the metal using the cutting and welding tools to build the structures that make the high ropes courses. The metal cutting equipment appear to be exempt using Rule 285(2)(l)(vi)(B). The welding equipment appears to be exempt with Rule 285(2)(i).

Plastic and Wood Tools:

The plastic and wood cutting and tooling equipment are located in the 1291 Lincoln street building. Ropes Course does use tools to cut plastics and woods for their high ropes courses obstacles. These appear to exempt using Rule 285(2)(l)(vi)(B).

Cold Cleaner:

The facility has one cold cleaner located in the 1300 Lincoln street building. The solvent that the facility uses is MEK. The facility was able to provide the SDS for the solvent. The facility does the maintenance on the cold cleaner themselves. The maintenance occurs once per month. The lid was down during the inspection and appeared to be operated properly.

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in non-compliance with PTI No. 15-16. Staff stated to Mr. Conrad that a violation notice would be sent to the facility for the VOC recordkeeping and MEK reclamation recordkeeping issues. Staff concluded the inspection at 11:30 AM.-CJY

NAME Cody YoungerDATE 1/18/19SUPERVISOR RIL