

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 Young DATE 1/18/19 SUPERVISOR RIL