

Manita

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

P089747617

FACILITY: Ropes Courses Inc.		SRN / ID: P0897
LOCATION: 248 North Street, 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:
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 both Ropes Course Incorporated (hereafter Ropes Course) facilities. Staff conducted the inspection of Ropes Course River street facility in conjunction with the Lincoln Road facilities. 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.

The River Street facility is located next to the Allegan Event Center. The event center is filled with the obstacles and high ropes structures.

Ropes Course manufactures high ropes course 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 River street facility has one General Surface Coating permit to cover the coating lines.

Ropes Course River street facility has not been inspected by the AQD previously. Staff asked, and Mr. Conrad stated that the facility does not have any emergency generators, boilers, or cold cleaners.

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:

The River street facility has one booth with a divider. The facility uses one side 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 recovery 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 and Staff was not able to visually see the filters.

Ropes Course also applies 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. The facility is not calculating monthly VOC emissions records just keeping an annual record. 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 1.38 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 VOC are calculated to be 1.38 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.

### **Blast Booth:**

Ropes Course has a blast booth inside the River 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 River 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).

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. 30-18. 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 Yazzie DATE 1/18/19 SUPERVISOR RIL