STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE

GRETCHEN WHITMER
GOVERNOR

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LIESL EICHLER CLARK
DIRECTOR

January 22, 2019

January 23, 2019

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

SRN: P0897, 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 248 North Street, 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 30-18;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Coating Line	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	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	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 30-18.

The conditions of PTI number 30-18 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.

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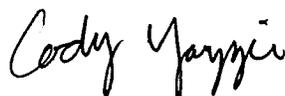
Cody Yazzie
Environmental Engineer
Air Quality Division
269-567-3554

CY:ne

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