

ESCANABA & LAKE SUPERIOR RAILROAD COMPANY

ONE LARKIN PLAZA
WELLS, MICHIGAN 49894 - 0217

November 20, 2013

Mr. Ed Lancaster
Senior Environmental Quality Analyst
Air Quality Division
1504 West Washington Street
Marquette, MI 49855

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Air Quality Division

RE: SRN: N2967 Delta County Violation Notice

Dear Mr. Lancaster:

This letter is in response to your November 12, 2013, letter to Mr. Mike Logan at the Escanaba & Lake Superior Railroad Company. The following are responses to each of the items requested in your letter:

1. Dates the Violation Occurred

In speaking with our operating personnel, it has been determined that the events occurred over an approximate 2 week period prior to your site visit.

2. Explanation of the Causes and Duration of the Violation

As you observed, we have 2 bag houses, that each have a bank of 16 cells. Each cell is equipped with a pre-filter, followed by a bag filter. These filters are serviceable and must be replaced at a frequency that is directly related by the amount of production and the quality of the blasting material. Due to recent increases in production, filter replacement was required sooner than expected and we discovered that we didn't have enough filters on hand to complete the replacement. As a result, we did not replace 4 of the 16 filters in each of the bag houses while awaiting the next shipment of replacement filter.

3. Is the Violation on-Going?

No. Even though the replacement filters were not available at the time of your visit, we immediately re-installed some used filters so that there were no open cells in either bag house.

4. Corrective Actions

As stated in #3, the immediate corrective action was to re-install used filters, which took

place on October 17th. No further corrective actions are proposed, since the bag houses are fully operational.

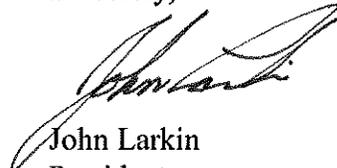
5. Steps to Prevent a Reoccurrence

- Keep a larger inventory of filters on hand at all times. We will always have two (2) complete sets and three (3) pre-filters for bags so supply will not be a problem.
- Reinforce with all staff that blasting cannot take place without all filters being in place.
- Inform and explain to all staff the permit requirements, with emphasis on the "Special Conditions" and their responsibilities for maintaining compliance.
- Perform more frequent inspections of filters conditions and adjust replacement frequency accordingly.

I trust that this information adequately addresses your concerns and assure you that we will commit the necessary resources to remain in compliance with our permit.

Please contact me if you have any questions.

Sincerely,



John Larkin
President

JCL/do

cc: Dennis Bittner
Thomas Klimek
Mike Logan
Steve Sullivan