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

N296730804

FACILITY: E & LS RAILROAD		**SRN / ID:** N2967
LOCATION: 1 LARKIN PLAZA, WELLS		**DISTRICT:** Upper Peninsula
CITY: WELLS		**COUNTY:** DELTA
CONTACT: Steve Sullivan , Foreman		**ACTIVITY DATE:** 08/25/2015
STAFF: Ed Lancaster	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Conducted an unannounced, scheduled compliance inspection.		
RESOLVED COMPLAINTS:		

I arrived at the facility on Tuesday, August 25th, and met with the Shop Foreman, Steve Sullivan. From past meetings/inspections with Mr. Sullivan he was familiar with the process and immediately handed me the company's paint use log to review as he took care of some tasks requiring his attention.

The company began painting this year on January 6th. The company's monthly paint use through August 24th is listed below, showing compliance with Special Condition (SC) No.19:

Month	Gallons
January	65
February	23
March	21
April	126
May	62
June	9
July	27
August	285

Mr. Sullivan informed me the company was awarded a contract to paint 200 rail cars and began working on that yesterday, Monday, the 24th. He continued by saying the new contract has allowed them to add a second shift of 6 employees, with each shift working 9-hour days, 7 days a week. Prior to being awarded this contract they were working one ten-hour shift, 6 days a week. Mr. Sullivan said the painting of the rail cars was the bottle neck of the operation due to the drying time of the paint. He expects his crew to be able to sandblast and paint 1.5 cars per day, using approximately 22 gallons of paint per rail car.

Based on the above information and the MSDS of the coatings supplied by Mr. Sullivan, the company can be expected to be in compliance with their VOC emission rates and paint usage limits. The MSDS lists the average VOC for the coatings as 1.31 pounds of VOC/gallon (SC Nos. 15 and 23).

Assuming 22 gallons of coating per rail car and 1.5 cars per day, the company is applying 33 gallons per day or 990 gallons per month, well under the 3,690 gallon monthly limit established in SC No. 19.

An average hourly VOC emission rate would be 33 gallons per day x 1.31 lbs. VOC/gallon divided by 18 hours would yield 2.40 lbs. of VOC per hour. The annual VOC emissions, assuming the company operated 365 days per year, would be 7.9 tons per year, both numbers well below the permit limits of 20.0 pounds per hour and 47.7 tons per year (SC No. 14).

The exhaust filters were in place for the paint booth (SC No. 20), Mr. Sullivan pointed out the

bank of filters on the east wall were coated with fresh paint, while the filters on the west wall were newly replaced with no paint residue.

The paint crew was in the process of masking off parts of the rail car prior to painting, therefore I was unable to observe the booth in use and no visible emissions were observed from the stacks (SC Nos. 18 and 22).

During the inspection I observed no visible emissions from the two blasting booth stacks (SC Nos. 17 and 27), the filters were installed and operating properly (SC No. 21) and both booth doors were closed during operation (SC No.26).

The AQD has not requested the company to verify VOC or particulate emission rates from the operations to date (SC Nos. 24 and 25).

Mr. Sullivan stated that since the last inspection when it was discovered the company did not have filters in place for the blasting booths the company has been diligent in making sure there are at least two extra sets of filters in-house for the paint and blasting booths.

At the time of the inspection the company appears to be in compliance with their permit and the Air Pollution Control Rules.

NAME Ed Lancaster DATE 8/31/15 SUPERVISOR_____