



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center – 1600 John F Kennedy Blvd
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Air Act Inspection of Dana Railcare
Inspection Date(s): 9/19/2023
Regulatory Program(s): SIP, NSPS
Company Name: Dana Railcare
Facility Name: Dana Railcare
Facility Location: 1280 Railcare Ave,
Wilmington, DE 19802
Latitude: 39.74189 **Longitude:** -75.5222
County/Parish: Newcastle
AFS/ICIS-Air Number: DE0000001000300351
Permit Number: APC-2007/0067
NAICS Code: 811310 **SIC:** 7699
Unique Project #: 3E23CA040A
Facility Representatives: **Point of Contact**
Jennings Nichols, Plant Manger ☒
Phone: (302)521-7047 Contact: jnichols@danacompanies.com
Brian L. Hudson, Safety & Compliance Manager ☐
Phone: (302)521-8221 Contact: bhudson@danacompanies.com

EPA Inspectors:
Parmatma Adhikari, Air Inspector, 3ED21
Phone: (215)814-2161 Contact: Adhikari.parmatma@epa.gov
Stafford Stewart, Air Inspector, 3ED21
Phone: (215)814-5352 Contact: Stewart.stafford@epa.gov

State/Local Inspectors:
Brad Klotz, Environmental Engineer, DNREC
Phone: (302)323-4542 Contact: Bradley.klotz@delaware.gov
David Potter, Program Manager, DNREC
Phone: (302)323-4542 Contact: Davidm.potter@delaware.gov

EPA Inspector

Signature

Parmatma Adhikari

Date

Four Penn Center – 1600 John F Kennedy
Blvd (3ED21)
Philadelphia, PA 19103-2852

Supervisor

Signature

Kristen Hall

Date

Table of Contents

<u>Section</u>		<u>Page</u>
I	Introduction.....	3
A	Summary of the Facility.....	3
B	Inspection Opening Conference.....	3
II	Site Activity/Process Information.....	4
III	Observations.....	4
IIII	Records Review.....	5
V	Closing Conference.....	7
VI	List of Attachments.....	8

I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Dana Railcare (Dana or Facility) to verify compliance with applicable State and Federal regulations. The Delaware Department of Natural Resources & Environmental Control (DNREC) was notified of the inspection on September 5, 2023, via email. On September 18, 2023, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Jennings Nichols (Plant Manager), prior to the inspection (see Attachment 2). These records are listed in the Records Review section of the report.

The inspection included an evaluation of the Facility's processes and its compliance with the CAA. All information included in this report is the result of statements by the Facility representatives, materials shown to the inspectors by the Facility representatives, and/or documents provided by the Facility representatives to the inspectors at the time of, or subsequent to, the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in this report.

A. Summary of the Facility

The Facility is located at 1280 Railcar Avenue, Wilmington DE 19802. Dana Railcare is a railroad car cleaning and maintenance facility. Dana currently provides cleaning and maintenance services for its own rail cars as well as for the GLNX Corporation's rail cars.

The Facility received a CAA synthetic minor permit (Permit # APC-2007/0067) from DNREC on May 7, 2007. The Facility is restricted to certain types of coating that maintains a VOC limit under 25 TPY.

The Facility is subject to, or potentially subject to the following federal regulations:

- **40 CFR Part 63, Subpart T**—National Emission Standards for Halogenated Solvent Cleaning
- **40 CFR Part 63, Subpart XXXXXX** - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.

B. Inspection Opening Conference

At 9:00 am on September 19, 2023, EPA inspectors arrived at the Facility for a CAA inspection and conducted a brief opening conference. Dana was represented by Jennings Nichols, Plant Manager and Brian L. Hudson, Safety & Compliance Manager. Also, David Potter, Program Manager and, Brad Klotz, an air inspector from DNREC were present. EPA inspectors, Parmatma Adhikari and Stafford Stewart presented their credentials and explained the purpose of the visit was to conduct an inspection to determine compliance with the permit and any applicable state or federal regulations. Additionally, EPA informed the facility representatives of their right to claim any material obtained during the inspection as confidential business information (CBI). At that time, Jennings Nichols did not claim any photos or documentation obtained during the inspection as CBI.

II.Site Activity/Process Description

Dana was founded around 1994. Prior to Dana, the company operated under the name Triple C Railcare Company ("Triple C"). Dana does not own or operate any additional repair centers, but they do have trucking terminals throughout the country. Dana covers approximately 4.5 acres of the area rented from Norfolk Southern Railway. The Facility is open eight hours a day, five days a week, and has 14 full-time staff. Dana representatives indicated that they do not have mobile staff available to offer remote services. Additionally, Dana does not have a specific annual shutdown routine, although they are normally closed on holidays.

The cleaning procedure of railcars begins with the removal of residual liquified petroleum gas (LPG) from the railcar. Dana measures the pressure of the propane railcar to calculate the volume of propane it holds, then burns it using steam-assisted flare system. Dana continuously monitors steam pressure to the flare tower when the tower is in operation. Once the liquid petroleum gas has been flared, the steam cleaning process of the railcar begins at the cleaning rack.

After the steam cleaning process is completed in the cleaning rack, the railcar is taken to the repair shop and any components that require cleaning are taken to the parts washer room. Dana's repair shop has three tracks and can handle nine cars at once. Dana provides railcar maintenance and repair in accordance with the customer's specifications. To undertake maintenance and repairs, most railcars must be unjacketed. Dana mostly replaces railcar valves, maintenance brakes and wheels, and performs welding as needed.

Dana uses a 1.4 MMBTU natural gas fired boiler to generate the steam used for cleaning railcars. They also have a kerosene fired space heater located in the paint booth building. Dana does not operate additional combustion sources such as emergency generators, fire pumps, etc., they have a sand blasting facility and a paint booth, but neither has been operational since July 2019. Dana does not have any underground storage tanks; however, it does have one 1,000 gallon above ground diesel storage tank and two 1,000 gallon above ground propane storage tanks on site.

The opening conference concluded at 9:45 am.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 9:45 am by Jennings Nichols, Plant Manager and Brian L. Hudson, Safety & Compliance Manager of Dana. Brad Klotz and David Potter of DNREC were also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 2). The photos were taken by EPA inspector Stafford Stewart.

The inspection team started their walkthrough by leaving the meeting room and making their way to the railcar entrance point (flaring station). There were no flaring operations being conducted at the time of the inspection. Mr. Nicholas stated that when the railcars containing residual propane arrive for repair, the first step is to evaluate the railcar's pressure level and, if necessary, flare the propane residue. Only LPG released from railcars is burned in the flare

system. Dana constantly checks the steam pressure while the flare tower is in use. Dana also records the number of railcars vented each day and the hours of operation.

The inspection team headed to the boiler room. At the time of the inspection, the boiler was not in use. The inspection team noted the information on the boiler data plate (Cleaver Brooks gas fired boiler rated as 40 HP, years of built: 2021) The inspection team observed a 1000-gallon propane tank near the boiler room. Mr. Nicholas stated that the propane tank serves as boiler fuel and is typically 80% full. Steam from the boiler is used in both the flare and the cleaning rack for steam cleaning. The inspection team then observed the cleaning rack. Two railcars were parked there, but no cleaning was done at the time of the inspection.

The inspection team proceeded to the valve shop. Dana conducts repairs on valves and gauges utilized in railcars at the valve shop. The inspection team did not notice any activities at the time of inspection. Following the valve shop inspection, the parts washing room was inspected. Mr. Nichols mentioned that Dana uses Safety Kleen solvent parts washer. The cold solvent cleaner has a working mode cover, however there was no component cleaning during the inspection.

Afterwards, the inspection team was directed to the repair shop. The repair shop has three tracks and can hold nine railcars at once. The repair shop was nearly full at the time of the inspection, with eight railcars. Mr. Nicholas stated that Dana only offers two types of services: complete repair and general cleaning. Complete repair takes around three weeks for each railcar, while basic cleaning is usually done one railcar each day. Inspection team noticed several welding machines at the repair facility. EPA inspectors asked about the percentage of work that required welding, Mr. Nicholas stated that around 15% of the jobs required welding.

The inspection team then proceeded toward the sandblasting zone. The words "Blast shop out of service" were written on the blasting building's entryway. Mr. Nicholas stated that there are plans for starting operations in the near future, dependent upon Dana's successful recertification from the American Railroad Association. Mr. Nicholas stated that Dana utilized black beauty as the blasting media for the process. The residue of the black beauty media goes to Cherry Island landfills for disposal. A silica sand tower was also observed during the inspection outside the sandblasting facility.

Following the observation of the Sandblasting building, the inspection team proceeded to the rail car painting area or paint booth. Mr. Nicholas stated that the paint booth has not been operational since 2019. Some unused cars were parked inside the paint booth. Mr. Nicholas also mentioned that Dana intends to reopen the paint booth in the near future.

The walk through was completed at 11:10 am.

IV. Records Review

Immediately after the walkthrough, the records review commenced at 11:10 am. EPA inspectors reviewed documents requested in the September 19, 2023, email to Jennings Nichols and (see Attachment 1). Records were provided at the time of the inspection by Jennings Nichols and Brian L. Hudson of Dana. Below are the records requested and what was provided:

1. Provide a hardcopy and electronic copy of a facility plot plan.

Dana provided printed copy of the facility plot plan.

2. Provide copies of any initial notifications or notifications of compliance status that may have been submitted to EPA or DNREC for any applicable regulation under 40 C.F.R. Parts 60, 61 or 63.

Dana stated there are no such records available.

3. Provide copies of any quarterly, semiannual, or annual reports submitted to EPA or DNREC for any applicable regulation under 40 C.F.R. Parts 60 & 63 for the period 2019 - present.

Dana stated there are no such records available.

4. Provide copies of any emission statements submitted to DNREC for 2019 - present. These statements should include emissions of NO_x, PM, VOC, and HAP's. Also, provide calculations for the actual emissions generated and reported.

At the time of inspection, Dana did not provide the emission statement but on September 20, 2023, Brad Klotz of DNREC forwarded the emission inventory of 2020 along with other documents.

5. Provide calculations for the potential to emit NO_x, SO₂, VOC, PM, and HAP for the entire facility. These calculations should include each emission factor and its derivation (e.g., stack test, CEMS, AP-42, etc.).

Dana provided the record of potential NO_x and PM emission from Boiler for the year 2019, 2020 and 2022. Dana also provided the Potential NO_x emission from flair for the year 2018 and 2020.

6. Provide the copies of 12-month rolling emissions calculations from each source and facility-wide for the following pollutants: NO_x, PM, VOC, and HAPs (individual and total) from January 2019 to Present. Include the emission factors used for each pollutant and source(s) and the hours of operation for each unit on which the emissions are based.

Dana provided the record of following emission calculation.

<i>Pollutants</i>	<i>Unit/Process</i>	<i>Year</i>
<i>NO_x</i>	<i>flare</i>	<i>2018, 2019 and 2020</i>
<i>VOC</i>	<i>cleaning solvents</i>	<i>2018, 2019</i>
<i>PM</i>	<i>coating</i>	<i>2018, 2019</i>

7. See the attached spreadsheet related to the combustion units onsite. For each combustion unit identified in the Combustion Unit Tab, use the tab titled "Stack Tests" to provide the following information:
 - a. Date of each test conducted between January 2018 and the present;
 - b. Each pollutant tested and the emission result (lb/hr, ton/yr, etc.).
 - c. Identify if the test was conducted for informational purposes or to determine compliance.

Dana mentioned that the stack test is not required for the combustion sources, so the information is not available.

8. Identify which combustion units identified in the “Combustion Units” tab are equipped with continuous emission monitoring systems (CEMS). See the “CEMS” tab in the combustion Excel spreadsheet. For each unit that has a CEMS, provide:
 - a. The date the CEMS was installed;
 - b. Pollutants monitored;

Dana mentioned that the combustion source is not equipped with continuous emission monitoring systems (CEMS).

9. Provide copies of any enforcement actions issued to DANA Railcare by either EPA or DNREC for any media from 2018 to the present.

Dana mentioned that there has not been any enforcement action issued by EPA and DNREC

10. All visible emission (Method 9, method 22 or other) survey records, including any corrective actions completed to alleviate the presence of VE.

Dana mentioned that the visible emission record is not required.

In addition, the records requested, Dana provided the technical data sheet of Turcot CE 181 (High-Glass DTM Epoxy)

V. Closing Conference

After the records review, EPA inspectors, DNREC Inspectors, Jennings Nichols and Brian Hudson of Dana had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is ongoing, and any areas of concern identified in the final report do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 1:05 pm.

The following have been identified as potential issues during the inspection. They are issues that require either further investigation by EPA or additional information or explanation by the Facility.

- While EPA did not identify any specific issues with Dana during the inspection, a thorough review of the records collected during the inspection is being conducted, and EPA may generate additional questions.

VI. List of Attachments

Attachment 1: Photo Log.

Attachment 2: Email correspondence to of records requested to Jennings Nichols (Plant Manager) review during inspection

Attachment 1: PHOTO LOG

Facility: Dana Railcare

Location: Wilmington, DE

Inspection Date: 9/19/2023

EPA Inspector: Parmatma Adhikari

Photographer: Stafford Stewart



Photo Number: 1

Photo Description: Flare Area



Photo Number : 2

Photo Description: Flare Area



Photo Number : 3

Photo Description: Propane Tank



Photo Number : 5
Photo Description: Boiler



Photo Number : 6

Photo Description: Steam Cleaning Rack



Photo Number : 7

Photo Description: Water Storage Railcar



Photo Number : 8

Photo Description: Valve Shop



Photo Number : 9

Photo Description: Parts Washer



Photo Number : 10

Photo Description: Repair Shop



Photo Number : 11

Photo Description: Repair Shop



Photo Number : 12

Photo Description: Repair Shop



Photo Number : 13

Photo Description: Black Beauty (Blasting Media)



Photo Number : 14

Photo Description: Blasting Building



Photo Number : 15

Photo Description: Silica Sand Tower



Photo Number : 16

Photo Description: Diesel Tank



Photo Number : 17

Photo Description: Diesel Tank



Photo Number : 18

Photo Description: Paint Booth



Photo Number : 19

Photo Description: Hazardous Waste Area in Paint Booth



Photo Number : 20

Photo Description: Paint Booth



Photo Number : 21

Photo Description: Paint Booth

From: [Adhikari, Parmatma](#)
To: [Jennings Nichols](#)
Subject: Clean Air Act (CAA) inspection_ Dana Railcare
Date: Monday, September 18, 2023 9:41:00 AM
Attachments: [DANA Railcare Source List September 2023.xlsx](#)

Hello Mr. Nichols,

Per our recent conversation , EPA Region 3 is planning to conduct a Clean Air Act (CAA) inspection of the Dana Railcare located in Wilmington, DE, on September 19, 2023. We will begin the inspection at 9:00 AM. It will be myself and Stafford Stewart from EPA, and Bradley Klotz and David Potter from the Delaware Department of Natural Resources & Environmental Control. The inspection will consist of an opening meeting to discuss the facility operation, a walkthrough, records review and a brief closing meeting. EPA will also take photographs during the walkthrough. I wanted to confirm that the following PPE is required on-site: Hard hat, safety glasses, and safety shoes.

To expedite the inspection process, please have ready the following documents.

1. Provide a hardcopy and electronic copy of a facility plot plan.
2. Provide copies of any initial notifications or notifications of compliance status that may have been submitted to EPA or DNREC for any applicable regulation under 40 C.F.R. Parts 60, 61 or 63.
3. Provide copies of any quarterly, semiannual, or annual reports submitted to EPA or DNREC for any applicable regulation under 40 C.F.R. Parts 60 & 63 for the period 2019 - present.
4. Provide copies of any emission statements submitted to DNREC for 2019 - present. These statements should include emissions of NOx, PM, VOC, and HAP's. Also, provide calculations for the actual emissions generated and reported.
5. Provide calculations for the potential to emit: NOx, SO2, VOC, PM, and HAP for the entire facility. These calculations should include each emission factor and its derivation (e.g., stack test, CEMS, AP-42, etc.).
6. Provide the copies of 12-month rolling emissions calculations from each source and facility-wide for the following pollutants: NOx, PM, VOC and HAPs (individual and total) from January 2019 to Present. Include the emission factors used for each pollutant and source(s) and the hours of operation for each unit on which the emissions are based.
7. See the attached spreadsheet related to the combustion units onsite. For each combustion unit identified in the Combustion Unit Tab, use the tab titled "Stack Tests" to provide the following information:
 - a. Date of each test conducted between January 2018 and the present ;
 - b. Each pollutant tested and the emission result (lb/hr, ton/yr, etc.);
 - c. Identify if the test was conducted for informational purposes or to determine compliance.
8. Identify which combustion units identified in the "Combustion Units" tab are equipped with continuous emission monitoring systems (CEMS). See the "CEMS" tab in the combustion Excel spreadsheet. For each unit that has a CEMS, provide:
 - a. The date the CEMS was installed;
 - b. Pollutants monitored;
9. For each combustion unit identified in the "Combustion Units" tab in the spreadsheet, provide the following information:
 - a. Hours of operation per month from January 2020-present;
 - b. Amount of fuel combusted (gallons, MMscf, etc.) monthly January 2020-present.
10. Provide copies of any enforcement actions issued to DANA Railcare by either EPA or DNREC for any media from 2018 to the present.
11. All visible emission (Method 9, Method 22 or other) survey records, including any corrective actions completed to alleviate the presence of VE.

Please feel free to contact me if you have any questions regarding the inspection.

Thanks!

Parmatma Adhikari

Environmental Engineer

ECAD, Air Section

US EPA, Region III

Four Penn Center

1600 John F Kennedy Blvd

Philadelphia, PA 19103

215-814-2161