DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N640064646

FACILITY: AIS CONSTRUCTION EQUIPMENT CORP		**SRN / ID:** N6400
LOCATION: 3950 N GRAND RIVER AVE, LANSING		**DISTRICT:** Lansing
CITY: LANSING		**COUNTY:** INGHAM
CONTACT: Cliff Oles , Field/Paint Operations Manager		**ACTIVITY DATE:** 09/06/2022
STAFF: Michelle Luplow	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Onsite Inspection to determine compliance with PTI No.'s 570-97, 571-97, and 147-06 for 3 used oil-fired furnaces		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present Onsite: Cliff Oles, Field/Paint Operations Manager (coles@aisequip.com)

Other Personnel: Matthew Moore, Safety Manager (mmoore@aisequip.com)

Purpose:

Perform an unannounced onsite compliance inspection of American Industrial Sales (AIS) Construction Equipment Corp by determining compliance with PTI No.'s 570-97, 571-97, and 147-06 for used oil-fired furnaces.

Facility Background/Regulatory Overview: AIS sells and rents construction equipment.

Their paint shop and recon center are located at 3960 N. Grand River. This is the location where I met Cliff, prior to conducting the inspection. AIS's corporate warehouse is housed at 3950 N. Grand River. See attached map for location of the paint shop and recon center. Within the paint shop and recon center, washing, blasting and painting of industrial equipment is conducted.

AIS operates 1 shift 6 a.m. – 5 p.m. Monday – Friday.

Inspection: This was an unannounced onsite compliance inspection. At approximately 8:30 a.m. on September 6, 2022 I met with Cliff Oles, the Field/Paint Operations Manager.

PTI No.'s 570-97, 571-97, and 147-06 cover permitting of 3 used oil-fired furnaces. During the inspection I learned that the original units covered in these permits had been replaced, in addition to the installation of a 4th used oil-fired furnace. Table 1 contains a list of the equipment located onsite, including the 3 furnaces that are no longer present onsite, with their removal dates.

PTI No.'s 570-97, 571-97, and 147-06 will need to be voided because the equipment covered under these permits have been removed.

Table 1. Equipment (present and removed) Onsite.

Equipment	Description	Control	PTI/Exemption	Removal Date	Install Date
Used oil-fired furnace	Rated at 500,000 btu/hr	NA	PTI 570-97 (January 1998)	Unit replaced in 2017	NA
Used oil-fired furnace	Rated at 500,000 btu/hr	NA	571-97 (January 1998)	Unit replaced ~2017	NA
EUFURNACE – waste oil	CB-500 Clean Burn Multi-oil furnace 500,000 Btu/hr heat input 3.6 gal oil/hr fuel usage	NA	147-06 (May 2006)	Unit replaced ~ 2015	NA
NEW CB-500 used oil-fired furnace	500,000 btu/hr max rated capacity	Pre-filtered used oil	No PTI, not exempt	NA	2017
NEW CB-500 used oil-fired furnace	500,000 btu/hr max rated capacity	Pre-filtered used oil	No PTI, not exempt	NA	2017
NEW CB-500 used oil-fired furnace	500,000 btu/hr max rated capacity	Pre-filtered used oil	No PTI, not exempt	NA	2015

NEW CB-500 used oil-fired furnace	500,000 btu/hr max rated capacity	Pre-filtered used oil	No PTI, not exempt	NA	2021
2 Paint Booths (each 80' long)	Each booth can be split in half to make a 50' booth and a 30' booth	Fabric filters	Rule 287(2)(c)	Undetermined	Undetermined
Blast room	1 blast room that used corn cobs, aluminum oxide, or walnuts as abrasive materials	Cartridge filters that vent to ambient air, mechanical precleaner baffles	Rule 285(2)(l)(vi)(C)	Undetermined	Undetermined

Waste Oil-fired Furnaces

The used oil fired in these units is a combination of waste oil generated onsite as well as waste oil that is generated in the field. Because these units combust used oil that is generated in the field (as opposed to only burning used oil that is generated on the geographical site) these 4 new units are not exempt under Rule 282(2)(b)(iv). AIS has agreed to submit a permit application for these 4 units by October 11, 2022.

Although these 4 furnaces are not operating under the permits for the 3 previous furnaces, AIS is conducting operations in a way that would meet the requirements in PTI No.'s 570-97, 571-97, and 147-06, including filtering the oil prior to combustion and conducting analyses on the used oil. The new PTI for the 4 new units may be different from these 3 permits.

The used oil-fired furnaces were not operating during the inspection. These units are typically started up and kept running during the colder months of the year to heat buildings onsite.

A bulk tank containing the used oil for the furnaces is stored onsite. Each furnace has a filter that is used to filter the used oil prior to combustion. AIS charges and cleans the filters ever 4 – 6 weeks when the furnaces are in-use. I was told that the furnaces will not run efficiently if they are operating with bad filters.

Matthew Moore, Safety Manager, provided me with oil analyses (attached), which he said are conducted annually. The last test was conducted in October of 2021. The October 2021 test indicates that arsenic, cadmium,

chromium, and lead are present in the oil. Permitting of the 4 furnaces will include evaluation of emissions from combustion of this oil.

Paint Booths

The two paint booths appear to meet the requirements of Exemption Rule 285(2)(c). Each booth is limited to 200 gallons of coating per month, minus water. Jeff Platte, staffed in the Paint Department, provided me with monthly coating usage records(with water) from April – August 2022 (see Table 2).

Booth #	April (gallons)	May (gallons)	June (gallons)	July (gallons)	August (gallons)
1	74	61	12	38	52
2	56	38	26	46	69

During the inspection the paint booths were not being used. I entered both booths and confirmed that all fabric filters (paint booth exhausts through floor filters) were installed properly. C. Oles said they change the filters out when the pressure gauge reads negative.

Compliance Statement: AIS appears to be in compliance with all permits and exemptions at this time, pending the submittal of a permit application for the installation of the 4 used oil-fired furnaces.

Image 1(Site Location) : Circled location is the Paint Shop and Recon Center where AQD staff can find AIS staff to assist with inspection (3960 N. Grand River)

NAME Michelle Luplow DATE 9-6-22 SUPERVISOR RB

Pace Analytical Services, LLC
4171 40th St. SE
Grand Rapids, MI 49512
(616)975-4500

October 25, 2021

Matthew Moore
AIS Construction Equipment
3600 N Grand River Ave.
Lansing, MI 48906

RE: Project: AIS Reconditioning
Pace Project No.: 50299757

Dear Matthew Moore:

Enclosed are the analytical results for sample(s) received by the laboratory on October 11, 2021. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace National - Mt. Juliet
- Pace Analytical Services - Indianapolis

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Melanie Booms

Melanie Booms
melanie.booms@pacelabs.com
(616)975-4500
Project Manager

Enclosures

Pace Analytical Services, LLC
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CERTIFICATIONS

Project: AIS Reconditioning
Pace Project No.: 50299757

Pace Analytical Services Indianapolis

7726 Moller Road, Indianapolis, IN 46268
Illinois Accreditation #: 200074
Indiana Drinking Water Laboratory #: C-49-06
Kansas/TNI Certification #: E-10177
Kentucky UST Agency Interest #: 80226
Kentucky WW Laboratory ID #: 98019
Michigan Drinking Water Laboratory #9050
Ohio VAP Certified Laboratory #: CL0065
Oklahoma Laboratory #: 9204
Texas Certification #: T104704355
Wisconsin Laboratory #: 999788130
USDA Soil Permit #: P330-19-00257

Pace Analytical Services National

12065 Lebanon Road, Mt. Juliet, TN 37122
Alabama Certification #: 40660
Alaska Certification 17-026
Arizona Certification #: AZ0612
Arkansas Certification #: 88-0469
California Certification #: 2932
Canada Certification #: 1461.01
Colorado Certification #: TN00003
Connecticut Certification #: PH-0197
DOD Certification: #1461.01
EPA# TN00003
Florida Certification #: E87487
Georgia DW Certification #: 923
Georgia Certification: NELAP
Idaho Certification #: TN00003
Illinois Certification #: 200008
Indiana Certification #: C-TN-01
Iowa Certification #: 364
Kansas Certification #: E-10277
Kentucky UST Certification #: 16
Kentucky Certification #: 90010
Louisiana Certification #: AI30792
Louisiana DW Certification #: LA180010
Maine Certification #: TN0002
Maryland Certification #: 324
Massachusetts Certification #: M-TN003
Michigan Certification #: 9958
Minnesota Certification #: 047-999-395
Mississippi Certification #: TN00003
Missouri Certification #: 340
Montana Certification #: CERT0086
Nebraska Certification #: NE-OS-15-05
Nevada Certification #: TN-03-2002-34
New Hampshire Certification #: 2975
New Jersey Certification #: TN002
New Mexico DW Certification
New York Certification #: 11742
North Carolina Aquatic Toxicity Certification #: 41
North Carolina Drinking Water Certification #: 21704
North Carolina Environmental Certificate #: 375
North Dakota Certification #: R-140
Ohio VAP Certification #: CL0069
Oklahoma Certification #: 9915
Oregon Certification #: TN200002
Pennsylvania Certification #: 68-02979
Rhode Island Certification #: LAO00356
South Carolina Certification #: 84004
South Dakota Certification
Tennessee DW/Chem/Micro Certification #: 2006
Texas Certification #: T 104704245-17-14
Texas Mold Certification #: LAB0152
USDA Soil Permit #: P330-15-00234
Utah Certification #: TN00003
Vermont Dept. of Health: ID# VT-2006
Virginia Certification #: VT2006
Virginia Certification #: 460132
Washington Certification #: C847
West Virginia Certification #: 233
Wisconsin Certification #: 998093910
Wyoming UST Certification #: via A2LA 2926.01
A2LA-ISO 17025 Certification #: 1461.01
A2LA-ISO 17025 Certification #: 1461.02
AIHA-LAP/LLC EMLAP Certification #:100789

Pace Analytical Services, LLC
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SAMPLE SUMMARY

Project: AIS Reconditioning
Pace Project No.: 50299757

Lab ID	Sample ID	Matrix	Date Collected	Date Received
50299757001	**AIS Reconditioning**	Solid	10/08/21 12:00	10/11/21 09:30

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SAMPLE ANALYTE COUNT

Project: AIS Reconditioning
Pace Project No.: 50299757

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
50299757001	**AIS Reconditioning**	EPA 6010	JDG	4	PASI-I
		EPA 1010	WDB	1	PASI-I
		EPA 9023	MJA	1	PAN

PAN = Pace National - Mt. Juliet
PASI-I = Pace Analytical Services - Indianapolis

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ANALYTICAL RESULTS

Project: AIS Reconditioning
Pace Project No.: 50299757

Sample: AIS Reconditioning **Lab ID: 50299757001** Collected: 10/08/21 12:00 Received: 10/11/21 09:30 Matrix: Solid

Results reported on a "wet-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6010 MET ICP	Analytical Method: EPA 6010 Preparation Method: EPA 3050 Pace Analytical Services - Indianapolis							
Arsenic	ND	mg/kg	0.97	1	10/20/21 07:25	10/20/21 13:51	7440-38-2	
Cadmium	ND	mg/kg	0.48	1	10/20/21 07:25	10/20/21 13:51	7440-43-9	
Chromium	ND	mg/kg	0.97	1	10/20/21 07:25	10/20/21 13:51	7440-47-3	
Lead	**1.4**	mg/kg	0.97	1	10/20/21 07:25	10/20/21 13:51	7439-92-1	
1010 Flashpoint,Closed Cup	Analytical Method: EPA 1010 Pace Analytical Services - Indianapolis							
Flashpoint	**>200**	deg F		1		10/20/21 13:49		
Wet Chemistry 9023	Analytical Method: EPA 9023 Preparation Method: 9023 Pace National - Mt. Juliet							
Extractable Organic Halogens	ND	mg/kg	100	1	10/21/21 20:03	10/22/21 13:02		

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
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QUALITY CONTROL DATA

Project: AIS Reconditioning
Pace Project No.: 50299757

QC Batch: 645349
QC Batch Method: EPA 3050
Analysis Method: EPA 6010
Analysis Description: 6010 MET
Laboratory: Pace Analytical Services - Indianapolis

Associated Lab Samples: 50299757001

METHOD BLANK: 2973936 Matrix: Solid
Associated Lab Samples: 50299757001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Arsenic	mg/kg	ND	0.96	10/20/21 13:45	
Cadmium	mg/kg	ND	0.48	10/20/21 13:45	
Chromium	mg/kg	ND	0.96	10/20/21 13:45	
Lead	mg/kg	ND	0.96	10/20/21 13:45	

LABORATORY CONTROL SAMPLE: 2973937

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Arsenic	mg/kg	45.8	44.9	98	80-120	
Cadmium	mg/kg	45.8	42.9	94	80-120	
Chromium	mg/kg	45.8	46.2	101	80-120	
Lead	mg/kg	45.8	43.0	94	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2973938 2973939

Parameter	Units	50300307003 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Arsenic	mg/kg	13.1	56.5	50.5	67.2	57.9	96	89	75-125	15	20	
Cadmium	mg/kg	ND	56.5	50.5	50.1	45.3	88	90	75-125	10	20	
Chromium	mg/kg	19.0	56.5	50.5	74.9	67.3	99	96	75-125	11	20	
Lead	mg/kg	18.3	56.5	50.5	65.2	57.7	83	78	75-125	12	20	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: AIS Reconditioning
Pace Project No.: 50299757

QC Batch: 1760685
QC Batch Method: 9023
Analysis Method: EPA 9023
Analysis Description: Wet Chemistry 9023
Laboratory: Pace National - Mt. Juliet

Associated Lab Samples: 50299757001

METHOD BLANK: R3720242-1 Matrix: Solid
Associated Lab Samples: 50299757001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Extractable Organic Halogens	mg/kg	ND	100	10/22/21 12:28	

LABORATORY CONTROL SAMPLE: R3720242-2

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Extractable Organic Halogens	mg/kg	250	258	103	85.0-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: R3720242-3 R3720242-4

Parameter	Units	L1418201-04 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Extractable Organic Halogens	mg/kg	ND	1000	1000	1060	1060	106	106	80.0-120	0.416	20	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

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QUALIFIERS

Project: AIS Reconditioning
Pace Project No.: 50299757

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

Pace Analytical Services, LLC
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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: AIS Reconditioning
Pace Project No.: 50299757

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
50299757001	**AIS Reconditioning**	EPA 3050	645349	EPA 6010	645897
50299757001	**AIS Reconditioning**	EPA 1010	645933		
50299757001	**AIS Reconditioning**	9023	1760685	EPA 9023	1760685

WO# : 50299757

50299757

AIS Construction Equipment Oil Samples

Included are oil samples for used oil at our AIS Reconditioning branch.

There are 1 sample containers included.

Mail sample to:

Pace Environmental Sciences

4171 40th St SE

Grand Rapids, MI 49512

Sampled 10/08/21 12:00pm per client email 10/12/21 msb

Please test the used oil for the following:

- Arsenic (5 ppm maximum)
- Cadmium (2 ppm maximum)
- Chromium (10 ppm maximum)
- Lead (100 ppm maximum)
- Flash Point (100 degrees Fahrenheit minimum)
- Total Halogens (4,000 ppm Maximum)

Once complete please email results to Matthew Moore – Mmoore@aisequip.com

Invoices can be mailed to AIS at 3600 N Grand River Ave. Lansing MI 48906 attention Matt Moore. You can use the PO MatthewMoore

Any questions please contact Matt Moore Safety Manager for AIS at

(989) 737-4028 or Mmoore@aisequip.com

10-11-21 0930

Pace Analytical®

Sample Conditions Upon Receipt Form (SCUR)

Date/Time: 10.11.21	**Evaluated by:** WDC
Client: AIS	
Project Manager: MSB	**Profile ID:**
Rush TAT Requested: YES NO	**Due Date:**
Lab Notified of Rush or Short Holds: YES NO	**Non Conformance Form Required:** YES NO

WO# : 50299757
PM: MSB Due Date: 10/25/21
CLIENT: GR-AIS

Samples Received Via: FedEx UPS Client Pace Courier Other: _____ **Comments:**

Custody Seals Present and Intact:	YES	NO	NA	
Received Sample Information Form(s): Drinking Waters Only	YES	NO	NA	
USDA Regulated Soils: (AL, AR, CA, FL, GA, ID, LA, MS, NM, NY, NC, OK, OR, SC, TN, TX, WA or Puerto Rico)	YES	NO	N/A	
Short Holds Present (< 72 Hours):	YES	NO		
Samples Received in Hold:	YES	NO		
Custody Signatures Present:	YES	NO		
Collector Signature Present:	YES	NO		
Packing Material Used:	YES	NO		
Samples Collected Today and On Ice:	YES	NO	N/A	

IR Gun #: 280 281 **Digital Thermometer #:** 282 283

Ice Type: WET Bagged / WET Loose BLUE NONE **1.** Cooler Temp Upon Receipt: 20.8/21.0 °C

Ice Location: TOP BOTTOM MIDDLE DISPERSED Temp should be 0-6°C (Initial/Corrected)

Temp Blank Received:	YES	NO		
Containers Intact:	YES	NO		
Correct Containers:	YES	NO		
Sufficient Volume:	YES	NO		
Sample pH Acceptable: All containers needing preservation are found to be in complaince with EPA recommendation **pH Strip Lot #:** _____ *Exceptions are VOA, coliform, LLHg, O&G, or any container with a septum cap or preserved with HCl*	YES	NO	N/A	
Residual Chlorine Absent: **Cl_2 Strip Lot #:** _____ (SVOC/Pest 625, PCB 608, Total/Amenable Cyanide)	YES	NO	N/A	
VOA Headspace Acceptable (<6mm):	YES	NO	N/A	
Trip Blank Received: HCl MeOH TSP OTHER	YES	NO		

Comments:

2. Cooler Temp Upon Receipt: _____ °C

3. Cooler Temp Upon Receipt: _____ °C

4. Cooler Temp Upon Receipt: _____ °C