

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

P062430201

FACILITY: AIS Construction Equipment Corp		SRN / ID: P0624
LOCATION: 56555 Pontiac Trail, NEW HUDSON		DISTRICT: Southeast Michigan
CITY: NEW HUDSON		COUNTY: OAKLAND
CONTACT: Matthew Moore , Safety Manager		ACTIVITY DATE: 07/08/2015
STAFF: Kerry Kelly	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: Self-initiated inspection		
RESOLVED COMPLAINTS:		

On July 8, 2015, AQD staff Rebecca Loftus and I conducted an unannounced inspection of AIS Construction Equipment Corp. (AIS) located at 56555 Pontiac Trail, New Hudson, Michigan. This facility is identified by the Air Quality Division with the State Registration Number (SRN) of P0624. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and Michigan's Air Pollution Control Rules.

#### *Facility Overview*

AIS sells, rents, and services construction equipment including excavators, bulldozers, asphalt rollers, and fork lifts. Regular sales office hours are Monday – Friday 7:00 am to 6:00 pm. A second shift consisting of repair technicians works during and after regular sales office hours.

#### *Inspection*

We arrived at approximately 10:00am and met with Mr. Matthew Moore, Safety Manager and Mr. David Park, Sales Consultant. During the pre-inspection meeting we initially showed our credentials (ID Badge), stated the purpose of our visit, and gave a copy of the pamphlet "Environmental Inspections: Rights and Responsibilities" to Mr. Moore and Mr. Park. I informed Mr. Moore and Mr. Park that we were referred to AIS Construction Equipment Corp. by DEQ staff from the Office of Waste Management and Radiological Protection concerned with two space heaters that burn waste oil at AIS.

Mr. Moore explained that AIS has six facilities, listed below, in Michigan that provide similar services to the New Hudson facility. One of the services AIS provides is changing the motor oil in off-site construction equipment. This process involves driving a "mobile lube truck", equipped with a 200 -300 gallon tank, to various sites in Michigan, emptying the used oil from the construction equipment into the mobile lube truck, then emptying the lube truck tank into storage tanks located at one of AIS's six locations. AIS conducts mobile oil changes on approximately 3-4 pieces of heavy equipment a day. The waste oil is tested and only spec oil is burned in the space heaters. Mr. Moore and Mr. Park accompanied us during the inspection.

WEST DETROIT  
56555 Pontiac Trail  
New Hudson, MI 48165

SAGINAW  
4600 AIS Drive  
Bridgeport, MI 48722

GRAND RAPIDS  
600 AIS Dr., S.W  
Grand Rapids, MI 49548

NORTHEAST DETROIT  
65809 Gratiot Avenue  
Lenox, MI 48050

LANSING  
3600 N. Grand River Avenue  
Lansing, MI 48906

TRAVERSE CITY  
8300 M-72 East  
Williamsburg, MI 49690

The AIS New Hudson facility consists of a sales office, a warehouse, and two garages. According to Mr. Moore there are no boilers or stationary emergency generators on site. AIS does have portable emergency generators for rent. Routine maintenance and repair of construction equipment is conducted in both garages. One of the garages, the rental side, services AIS equipment and the other garage, the service side, services privately-owned equipment. Both garages have similar equipment. In total, there are two CB 5000 space heaters, three 650 gallon storage tanks, one 1,000 gallon storage tank, one 3,000 gallon storage tank and three cold cleaners at this facility. The rated heat input capacity for each space heater is 500,000 Btu/hr. The storage tanks contain waste oil, generated off the geographical site, that is used to fuel the space heaters. Each cold cleaner has an air/vapor interface of not more than 10 square feet, the lids were closed, and the procedures for operation, provided by AQD staff, were posted on all of the cleaners. Waste solvents are stored in sealed drums and are collected by Crystal Clean.

*Compliance Overview*

Currently, no permits are issued to AIS for the process equipment at this facility. The storage tanks appear to be exempt from R 336.1201 pursuant to R 336.1284(c). It appears that the cold cleaners are in compliance with the requirement of R 336.1707 and exempt from R 336.1201 in accordance with R 336.1281(h). AIS is in violation of 336.1201 because the waste oil that is burned in the space heaters at this facility is not generated at the geographical site as required by exemption R 336.1282(b)(iv).

*Conclusion*

AIS Construction Equipment Corp. is in violation of R 336.1201. A violation notice will be issued.

NAME *Samy Kelly*

DATE *7-14-15* SUPERVISOR *CJE*