

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

N661065602

FACILITY: Nationwide Truck Brokers	SRN / ID: N6610
LOCATION: 6601 Sloan Road, LANSING	DISTRICT: Lansing
CITY: LANSING	COUNTY: INGHAM
CONTACT: Dennis Merriman , Truck Shop Manager	ACTIVITY DATE: 10/28/2022
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance
SUBJECT: Onsite Compliance inspection to determine compliance with PTI 92-99	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

Inspected by: Michelle Luplow (author) and David Rauch, AQD Lansing District

Personnel Present Onsite: Dennis Merriman, Shop Manager (dennis.merriman@ntbtrk.com)

Andrew Lattimer, Director of Safety CDS (Andrew.lattimer@ntbtrk.com)

Purpose:

Perform an unannounced onsite compliance inspection of Nationwide Truck Brokers (NTB) to determine compliance with PTI No. 92-99 for used oil-fired furnaces.

Facility Background/Regulatory Overview: NTB is a truck hauling company. D. Merriman said they haul groceries for Meijer, Ice Mountain products, etc.

Inspection: This was an unannounced onsite compliance inspection. At approximately 2:16 p.m. on October 28, 2022 D. Rauch and I met with Dennis Merriman, NTB's Shop Manager.

PTI No. 92-99 covers permitting of 2 Clean Burn used oil-fired furnaces. Both were present onsite during the inspection; however, D. Merriman said one of the units was not working. NTB looking into getting this non-working unit fixed.

Table 1. Equipment (present and removed) Onsite.

Equipment	Description	Control	PTI/Exemption	Compliance Status
Two (2) used oil-fired furnaces	Clean Burn (CB) 500 units Serial #1: 16379	Filters	PTI 92-99	

	Serial #2: 1529			
2 Lochinvar Natural gas-fired boilers	Each rated at 650,000 Btu/hr Used to heat the building	NA	Rule 282(2)(b)(i)	Compliance – each unit is rated at less than 50 MMBtu/hr and appears to meet the exemption.
One (1) Natural gas-fired emergency generator	Onan R520000 Genset, 15 kW	NA	Rule 285(2)(g)	Compliance – unit is rated at less than 10 MMBtu/hr, appears to meet exemption.
4 Parts Washers	VicSol Mineral spirits, maintained by Vesco	Lid	Rule 281(2)(h)	Compliance – operating instructions were missing – AQD sent 6 operating instructions sticker sheets for NTB’s use to comply. All lids were closed during the inspection.

PTI 92-99: Used Oil-fired Furnaces

D. Merriman said that these units are used to heat the building as well as domestic hot water. The oil is generated from their distribution trucks. All oil from these trucks are captured in a 8,000-gallon used oil holding tote.

The composition of the waste oil contained in the tote that is used as fuel for the two used oil-fired furnaces is limited to the concentrations listed in Table 1.

Table 1.Used Oil Contaminant Limits

Contaminant	Max Concentration (ppm by weight)	November 28, 2022 Results (ppm)
Arsenic (As)	5.0	< 1.00

Cadmium (Cd)	2.0	<0.100
Chromium (Cr)	10.0	<4.00
Lead (Pb)	100	4.75
PCB's	1.0	<1.00
Total Halogens	1000	<200

NTB is required to maintain a record of the waste oil analysis on an annual basis, and should include the content of As, Cd, Cr, Pb, PCB's and total halogens, as well as the sulfur content in the waste oil. D. Merriman said they sample the oil from the trucks routinely to determine if there are any mechanical issues in the engine. He provided us with an oil analysis from "Freightliner 1223" which contains lead and chromium analyses over a period of time (see attached). Both chromium and lead appear to be under the max concentration limits. NTB, however, did not have oil analyses taken directly from the 8,000-gallon tote where waste oils from all trucks are combined. I requested that they sample and obtain results for the oil composition from the waste oil tote (and to do so annually thereafter).

Results were received on November 28, 2022 and are contained within Table 1 and attached for reference.

The SO₂ emission rate from both units should not exceed 1.7 lb/MMBtu heat input on a 24-hr period. This is equivalent to using waste fuel oil with a 1.5% sulfur content and a heat value of 18,200 BTU's per pound. The November 28, 2022 test results indicate a sulfur content of 0.3377% and a heat value of 19,670 BTU/lb, a specific gravity of 6.48 lb/gal and a Btu/gal content of 142,883. The SO₂ emission rate based on this information (and converting S to SO₂) is 0.31 lb/MMBtu SO₂.

Compliance Statement: NTB appears to be in compliance with PTI 92-99 and AQD exemption rules at this time.

NAME Michelle Luplow

DATE 11/30/22

SUPERVISOR RB



Summit Environmental Technologies, Inc.
3310 Win St.
Cuyahoga Falls, Ohio 44223
TEL: (330) 253-8211 FAX: (330) 253-4489
Website: <http://www.settek.com>

WO#: 22111473
Date Reported: 11/25/2022
Company: Vesco Oil Corp
Address: 1900 East Warren
Detroit MI 48207

Laboratory Report

Date Collected: 11/16/2022

Date Received: 11/23/2022

Project#: NTB Trucking C/O Vesco Oil Corp.

Client SampleID: NTB TRUCKING USED OIL TANK

Laboratory SampleID: 22111473-001

Matrix: Oil

Parameter	Method	Result	Analysis Date
Arsenic(As)	EPA 6010 C	< 1.00 ppm	11/23/2022
Cadmium(Cd)	EPA 6010 C	< 0.100 ppm	11/23/2022
Chromium(Cr)	EPA 6010 C	< 4.00 ppm	11/23/2022
Lead(Pb)	EPA 6010 C	4.75 ppm	11/23/2022
Silicon(Si)	EPA 6010 C	12.2 ppm	11/23/2022
Ash	ASTM D-482-02	0.40 %	11/25/2022
BTU/gal	ASTM D-240-09	142883 BTU/gal	11/23/2022
BTU/lb	ASTM D-240-09	19670 BTU/lb	11/23/2022
Flash Point	EPA 1010	>175 °F	11/23/2022
Chlorine, Total	EPA 9075	<200 ppm	11/23/2022
Water	ASTM D-6304	0.120 wt%	11/25/2022
Specific Gravity	ASTM D-4052	0.7766 @50°F	11/23/2022
% Sulfur	ASTM D-4294	0.3377 %	11/23/2022
Viscosity	ASTM D-445	231 SUS@40°C	11/23/2022
Total PCBs	EPA 8082	< 1.00 ppm	11/25/2022
pH	EPA 9045 D	6.5 s.u.@21.8C	11/23/2022

Project Manager:

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Case Narrative

WO#: 22111473
Date: 11/25/2022

CLIENT: Vesco Oil Corp
Project: NTB Trucking C/O Vesco Oil Corp.

WorkOrder Narrative:

22111473: This report in its entirety consists of the following documents: Cover Letter, Case Narrative, Analytical Results, QC Summary Report, Applicable Accreditation Information, Chain-of-Custody, Cooler Receipt Form, and other applicable forms as necessary. All documents contain the Summit Environmental Technologies, Inc., Work Order Number assigned to this report.

Summit Environmental Technologies, Inc., holds the accreditations/certifications listed at the bottom of the cover letter that may or may not pertain to this report. Please refer to the "Accreditation Program Analytes Report" for accredited analytes list.

The information contained in this analytical report is the sole property of Summit Environmental Technologies, Inc. and that of the customer. It cannot be reproduced in any form without the consent of Summit Environmental Technologies, Inc. or the customer for which this report was issued. The results contained in this report are only representative of the samples received. Conditions can vary at different times and at different sampling conditions. Summit Environmental Technologies, Inc. is not responsible for use or interpretation of the data included herein.

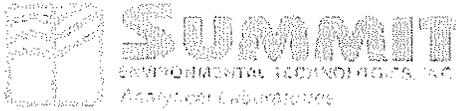
All results for Solid Samples are reported on an "as received" or "wet weight" basis unless indicated as "dry weight" using the "-dry" designation on the reporting units.

This report is believed to meet all of the requirements of the accrediting agency, where applicable. Any comments or problems with the analytical events associated with this report are noted below.

WorkOrder Comments:

Analytical Report Format/LEVEL I per client request.

Original



Summit Environmental Technologies, Inc.
 3310 Win St.
 Cuyahoga Falls, Ohio 44223
 TEL: (330) 253-8211 FAX: (330) 253-4489
 Website: <http://www.settek.com>

Sample Log-In Check List

Client Name: **VES-MI-48207** Work Order Number: **22111473** RcptNo: **1**

Logged by: **Tegan A. Richards** 11/23/2022 10:10:00 AM *Tegan Richards*
 Completed By: **Tegan A. Richards** 11/23/2022 11:26:51 AM *Tegan Richards*
 Reviewed By: **Jennifer Woolf** 11/23/2022 12:50:20 PM *Jennifer Woolf*

Chain of Custody

1. Is Chain of Custody complete? Yes No Not Present
 2. How was the sample delivered? UPS

Log In

3. Coolers are present? Yes No NA
 4. Shipping container/cooler in good condition? Yes No
 Custody seals intact on shipping container/cooler? Yes No Not Present
 No. Seal Date: Signed By:
 5. Was an attempt made to cool the samples? Yes No NA
 6. Were all samples received at a temperature of >0° C to 6.0°C Yes No NA
Not required
 7. Sample(s) in proper container(s)? Yes No
 8. Sufficient sample volume for indicated test(s)? Yes No
 9. Are samples (except VOA and ONG) properly preserved? Yes No
 10. Was preservative added to bottles? Yes No NA
 11. Is the headspace in the VOA vials less than 1/4 inch or 6 mm? Yes No No VOA Vials
 12. Were any sample containers received broken? Yes No
 13. Does paperwork match bottle labels? Yes No
 (Note discrepancies on chain of custody)
 14. Are matrices correctly identified on Chain of Custody? Yes No
 15. Is it clear what analyses were requested? Yes No
 16. Were all holding times able to be met? Yes No
 (If no, notify customer for authorization.)

Special Handling (if applicable)

17. Was client notified of all discrepancies with this order? Yes No NA

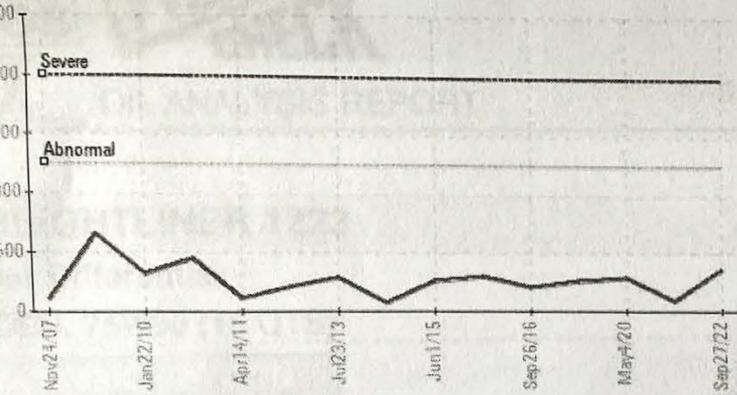
Person Notified: _____ Date: _____
 By Whom: _____ Via: eMail Phone Fax In Person
 Regarding: _____
 Client Instructions: _____

18. Additional remarks:

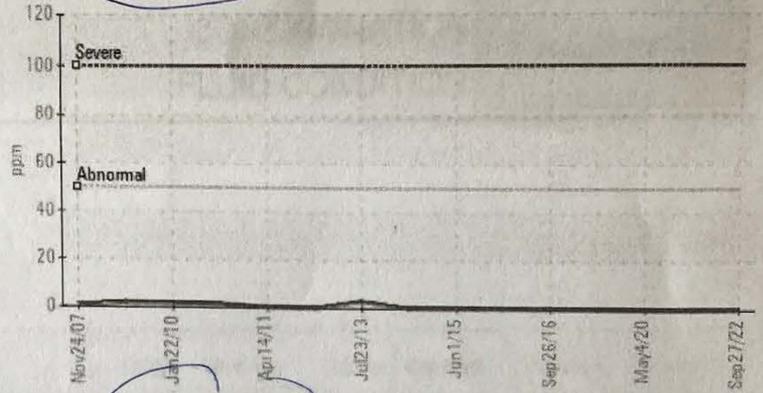
Cooler Information

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
box	14.6	Good	Not Present			

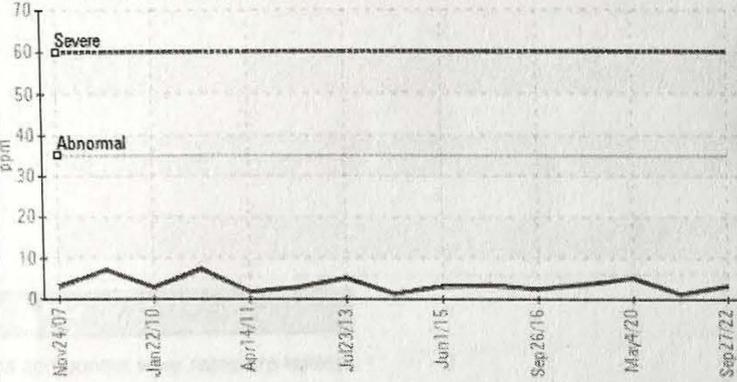
Iron (ppm)



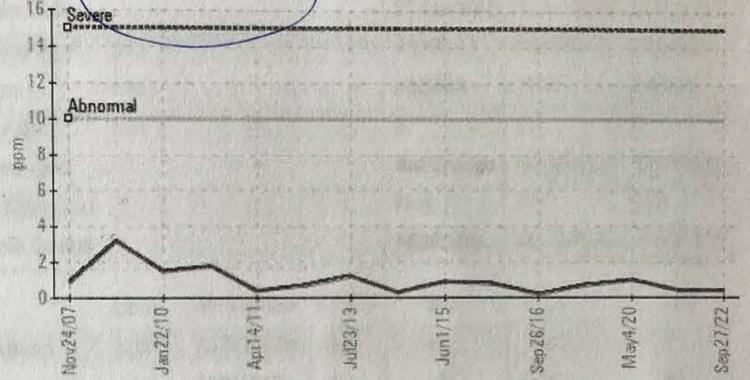
Lead (ppm)



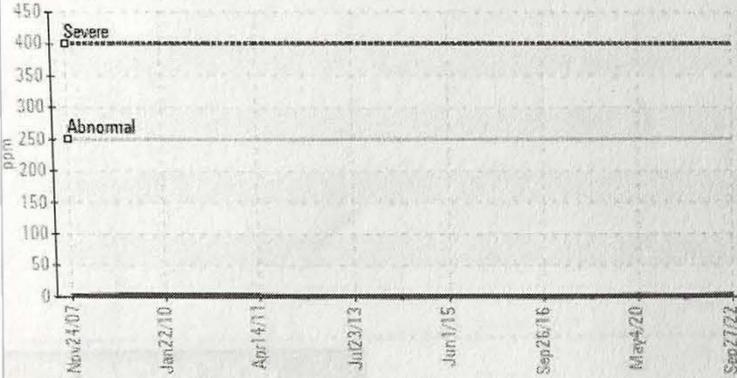
Aluminum (ppm)



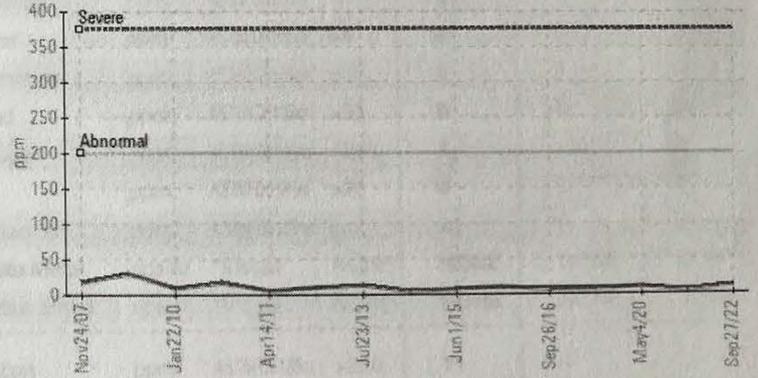
Chromium (ppm)



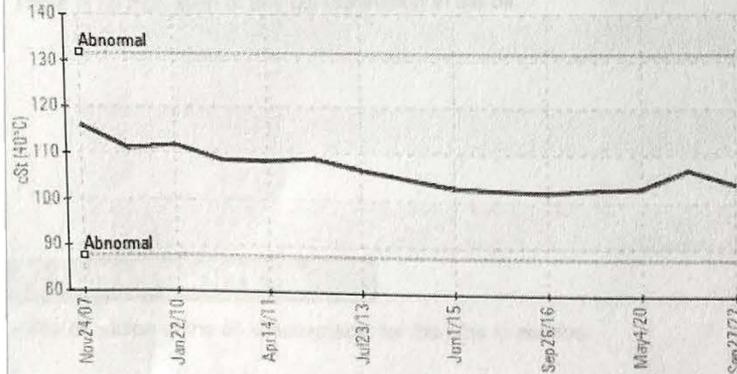
Copper (ppm)



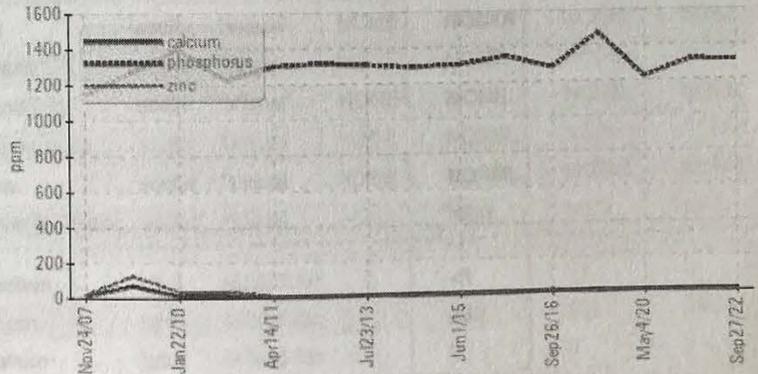
Silicon (ppm)



Viscosity @ 40°C



Additives



Laboratory : WearCheck USA - 501 Madison Ave., Cary, NC 27513
Sample No. : WC0652243 **Received** : 26 Oct 2022
Lab Number : 05676942 **Diagnosed** : 27 Oct 2022
Unique Number : 10191513 **Diagnostician** : Wes Davis
Test Package : MOB 1

NTB TRANSPORTATION - LANSING
 6601 SLOAN HWY
 LANSING, MI
 USA 48917

Certificate L2367
 To discuss this sample report, contact Customer Service at 1-800-237-1369.
 * - Denotes test methods that are outside of the ISO 17025 scope of accreditation.
 Statements of conformity to specifications are based on the simple acceptance decision rule (JCGM 106:2012)

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