

This facility was issued PTI #517-93 for a Dravo Hastings Thermoflo waste oil heater on 9/20/1993.

On 2/11/2015 I conducted an unannounced inspection of this facility. My initial contact was Mr. Gary Graham, Vice-President for Ken Graham Trucking. Mr. Graham stated that since the PTI was issued the company has built a new office building approximately 1/2 mile to the west of the truck repair shop. Both facilities are located on M-28. Mr. Graham's office is located in the new office. The truck shop is where the oil furnaces are located.

I visited the truck shop and met with the shop foreman, Mr. Dennis Glasser. Mr. Glasser stated the truck shop now has three waste oil furnaces. The furnace closest to the east wall is the newest unit and is only 3 to 4 years old. This is a Clean Burn Model CB-3500. The furnaces on the north wall and in the west part of the shop are both Reznor 3500 Btu units. Mr. Glasser thought these units were probably less than ten years old. All furnaces are maintained and cleaned annually. All furnaces burn waste oil generated by the facility's fleet of trucks. Mr. Glasser stated they probably change oil in a truck every day and each truck can hold up to 10 gallons of oil.

Each furnace has its own separate tank it draws the waste oil from. A sample was taken from the Reznor unit on the north wall. Sample #KG1 was taken and will be submitted to the laboratory for analysis. Final determination of compliance will be made upon receipt of the laboratory analysis.

A request will be sent to Lansing to void PTI #517-93 as the furnace specified has long been removed. All of the present furnaces will qualify for an exemption from Rule 201 and the requirement to obtain an Air Use Permit under Rule 285(b)(iv).

On 2/26/2015 the results were received from the laboratory. Sample KG1 has tested within acceptable parameters as waste oil.

The facility appears to be in compliance with the Air Pollution Control Rules.

A copy of the inspection report and sample analysis report will be sent to the company.

A handwritten signature in black ink, followed by the date "3/5/2015" written in a similar cursive style.

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

N393228562

FACILITY: KEN GRAHAM TRUCKING		SRN / ID: N3932
LOCATION: 5018 W M28, BRIMLEY		DISTRICT: Upper Peninsula
CITY: BRIMLEY		COUNTY: CHIPPEWA
CONTACT: GARY GRAHAM, VICE-PRESIDENT		ACTIVITY DATE: 02/11/2015
STAFF: Joel Asher	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Waste oil furnaces		
RESOLVED COMPLAINTS:		

This facility was issued PTI #517-93 for a Dravo Hastings Thermoflo waste oil heater on 9/20/1993.

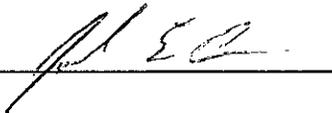
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NAME



DATE

2/17/15

SUPERVISOR



Analytical Laboratory
 1914 Holloway Drive 8660 S. Mackinaw Trail
 Holt, MI 48842 Cadillac, MI 49601
 Phone: 517 699 0345 Phone: 231 775 8368
 Fax: 517 699 0388 Fax: 231 775 8584
 email: lab@fibertec.us

Industrial Hygiene Services, Inc.
 1914 Holloway Drive
 Holt, MI 48842
 Phone: 517 699 0345
 Fax: 517 699 0382
 email: asbestos@fibertec.us

Geoprobe
 11766 E. Grand River
 Brighton, MI 48116
 Phone: 810 220 3300
 Fax: 810 220 3311

Chain of Custody #
 00001
 PAGE 1 of 1

Client Name: <u>MDEQ / AIR QUALITY DIVISION</u>					MATRIX (SEE BEAT CODES FOR CODE)	# OF CONTAINERS	PRESERVED (Y/N)	PARAMETERS							Turnaround		Matrix Code				
Contact Person: <u>JOEL ASHER (806) 250-5723</u>								ARSENIC	CADMIUM	LEAD	FLUORINE	TOTAL HALOGENS							24 hour RUSH (surcharge applies)	S Soil	GW Ground Water
Project Name/ Number: <u>KEN GRAHAM TRUCKING N3932</u>																			48 hour RUSH (surcharge applies)	W Water	SW Surface Water
Purchase Order#																			72 hour RUSH (surcharge applies)	A Air	WW Waste Water
Lab Sample #	Date	Time	Client Sample #	Client Sample Descriptor																	
	<u>2/11/15</u>	<u>10:00</u>	<u>K62</u>	<u>WASTE OIL</u>	<u>0</u>	<u>1</u>	<u>N</u>	<input checked="" type="checkbox"/>													
Comments:																					
Relinquished By: <u>JOEL ASHER MDEQ</u>					Date/ Time: <u>2/11/15 12:15</u>					Received By: <u>MARK</u>											
Relinquished By:					Date/ Time:					Received By:											
Relinquished By:					Date/ Time:					Received By Laboratory:											
LAB USE ONLY: Fibertec project number: Laboratory tracking: Temperature at Receipt:																					

revised April 2006

TERMS & CONDITIONS ON BACK



Thursday, February 26, 2015

Fibertec Project Number: 66514
Project Identification: Ken Graham Trucking (N3832) /N3832
Submittal Date: 02/17/2015

Mr. Joel Asher
MDEQ/AQD - Lansing District Office
525 W. Allegan Street
Constitution Hall-3N
Lansing, MI 48909

Dear Mr. Asher,

Thank you for selecting Fibertec Environmental Services as your analytical laboratory. The samples you submitted have been analyzed in accordance with NELAC standards and the results compiled in the attached report. Any exceptions to NELAC compliance are noted in the report. These results apply only to those samples submitted. Please note TO-15 samples will be disposed of 14 days after the reporting date. All other samples will be disposed of 30 days after the reporting date.

If you have any questions regarding these results or if we may be of further assistance to you, please contact me at (517) 699-0345.

Sincerely,

Daryl P. Strandbergh
Laboratory Director

DPS/arp

Enclosures

1914 Holloway Drive
11766 E. Grand River
8660 S. Mackinaw Trail

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Brighton, MI 48116
Cadillac, MI 49601

T: (517) 699-0345
T: (810) 220-3300
T: (231) 775-8368

F: (517) 699-0388
F: (810) 220-3311
F: (231) 775-8584



Analytical Laboratory Report
Laboratory Project Number: 66514
Laboratory Sample Number: 66514-001

Order: 66514
 Page: 2 of 3
 Date: 02/26/15

Client Identification: MDEQ/AQD - Lansing District Office	Sample Description: Waste Oil	Chain of Custody: 00001
Client Project Name: Ken Graham Trucking (N3832)	Sample No: KG1	Collect Date: 02/11/15
Client Project No: N3832	Sample Matrix: Oil	Collect Time: 10:00

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Ignitability (Waste Characterization) (EPA 1010A)

Aliquot ID: 66514-001

Matrix: Oil

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation		Analysis		
						P. Date	P. Batch	A. Date	A. Batch	Init.
‡ 1. Ignitability	170		°F	45	1.0	NA	NA	02/18/15	WK15B18A	NRV

Trace Elements by ICP/MS (EPA 0200.2-M/EPA 6020A)

Aliquot ID: 66514-001

Matrix: Oil

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation		Analysis		
						P. Date	P. Batch	A. Date	A. Batch	Init.
1. Arsenic	U		µg/kg	100	10	02/20/15	PT15B20B	02/23/15	T415B23A	JLH
2. Cadmium	U		µg/kg	50	10	02/20/15	PT15B20B	02/23/15	T415B23A	JLH
3. Lead	U		µg/kg	1000	10	02/20/15	PT15B20B	02/23/15	T415B23A	JLH

Total Halogens (SW 846 9076 (ML1))

Aliquot ID: 66514-001A

Matrix: Oil

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation		Analysis		
						P. Date	P. Batch	A. Date	A. Batch	Init.
‡ 1. Total Halogens	760		mg/kg	21	1.0	NA	NA	02/19/15	NA	MA

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Definitions/ Qualifiers:

- A: Spike recovery or precision unusable due to dilution.
- B: The analyte was detected in the associated method blank.
- E: The analyte was detected at a concentration greater than the calibration range, therefore the result is estimated.
- J: The concentration is an estimated value.
- M: Modified Method
- U: The analyte was not detected at or above the reporting limit.
- X: Matrix Interference has resulted in a raised reporting limit or distorted result
- W: Results reported on a wet-weight basis.
- *: Value reported is outside QA limits

Exception Summary:



Accreditation Number(s):

T104704518-15-3 (TX)

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Chain of Custody #
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Client Name: <u>MOED / AIR QUALITY DIVISION</u>				PARAMETERS				Turnaround		Matrix Code				
Contact Person: <u>JOEL ASHER (906) 250-5723</u>				MATRIX (SEE BSI# CODES FOR CODES)	# OF CONTAINERS	PRESERVED (Y/N)	ARSENIC	CADMIUM	LEAD	FLUORIDE	TOTAL HALOGENS	<input type="checkbox"/> 24 hour RUSH (surcharge applies)	S Soil	GW Ground Water
Project Name/ Number: <u>KEN GRAHAM TRUCKING N3932</u>												<input type="checkbox"/> 48 hour RUSH (surcharge applies)	W Water	SW Surface Water
Purchase Order#				<input checked="" type="checkbox"/> 72 hour RUSH (surcharge applies)	<input type="checkbox"/> Standard (5-7 bus. days)	A Air		ww Waste Water	Other: Specify					
Lab Sample #	Date	Time	Client Sample #	Client Sample Descriptor								Remarks:		
	<u>2/11/15</u>	<u>10:00</u>	<u>KL2</u>	<u>WASTE OIL</u>										
Comments:														
Relinquished By: <u>JOEL ASHER MOED ASD</u>				Date/Time: <u>2/11/15 12:15</u>	Received By: <u>M. P. K.</u>									
Relinquished By: <u>USPS</u>				Date/Time: <u>2/17/15 13:00</u>	Received By: <u>[Signature]</u>									
Relinquished By:				Date/Time:	Received By Laboratory:									
LAB USE ONLY: Fibertec project number: Laboratory Tracking: <u>66514</u> Temperature at Receipt:														

TERMS & CONDITIONS ON BACK