CITY OF DETROIT

OFFICE OF INSPECTOR GENERAL

Forensic Audit of the Department of Transportation

Disposition of Scrap Parts

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INSPECTOR GENERAL

Table of Contents **Page**

I. OBJECTIVE, SCOPE AND METHODOLOGY

A. Objective

The objective of the Office of Inspector General (OIG) forensic audit was to determine whether the Department of Transportation (DDOT) Vehicle Maintenance Department (VMD) policies and procedure are effective to reasonably prevent waste, fraud, abuse and/or corruption related to the disposition of vehicle parts removed from the DDOT coaches.

B. Scope

The scope of the OIG's audit is limited to the parts the VMD removed from the coaches during the period of July 1, 2018 through June 30, 2019.

It is important to note this audit did not assess the VMD's operational decisions related to the preventative and unscheduled maintenance of coaches. The audit also did not assess the frequency with which certain parts were replaced in coaches.

The scope of this forensic audit is strictly limited to the VMD's disposition of defective parts after the parts were removed from the coaches.

C. Methodology

The OIG's audit focused on the vehicle parts available for disposition based on the replacement parts DDOT's Materials Management Department (MMD) issued to the VMD during the period July 1, 2018 through June 30, 2019.

For purposes of this forensic audit, OIG's assessment presumed VMD logically removed various non-functional parts from the DDOT coaches to replace them with the parts the MMD issued to the VMD. Therefore, the VMD should have returned the defective parts to the MMD when MMD issued the replacement parts. After MMD received the defective parts from the VMD, MMD should have taken one of four actions stated below:

(1) Return the defective parts to the proper vendor if the parts are still under warranty;
(2) Submit the defective parts to a vendor for reclamation or refurbishment;
(3) Submit the defective parts to a scrap vendor for money or credit; or
(4) Properly dispose of the defective parts as garbage.

D. Standards

This audit was conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS) issued by the Comptroller General of the United States. The GAGAS standards require that we plan and perform the audit to obtain

sufficient and appropriate evidence in support of the findings and conclusions, as identified in our audit objectives.

E. Authority and Role

The OIG's authority to perform this audit is established in the 2012 Charter of the City of Detroit,[1] Section 7.5-306 which states in part:

> *The Inspector General shall investigate any public servant, city agency, program or official act, contractor and subcontractor providing goods and services to the City, business entity seeking contracts or certification of eligibility for City contracts and person seeking certification of eligibility for participation in any city program, either in response to a complaint or on the Inspector General's own initiative in order to detect and prevent waste, abuse, fraud and corruption.*

This particular OIG audit is therefore limited to reviewing the DDOT's operation in the disposition of its scrap metal to ensure honesty and integrity in DDOT by rooting out waste, abuse, fraud and corruption.

Likewise, each City department, agency, board, office, and commission is responsible for establishing and maintaining its purposes as required by the Charter to ensure it operates economically, efficiently, effectively and with integrity.

II. EXECUTIVE SUMMARY

The Inspector General would like to thank the DDOT administration for its cooperation and assistance with this audit.

A. Conclusions

The OIG's audit finds that DDOT did not have effective or efficient policies or procedures pertaining to the disposition of malfunctioning or defective scrap parts which required replacement. As such, DDOT was not able to account for the disposition of parts the VMD removed from the coaches during preventative and unscheduled maintenance for the audit period, July 1, 2018 through June 30, 2019. Due to the absence of policies and procedures pertaining to DDOT's disposition of its scrap, we conclude the DDOT is susceptible to waste, fraud, abuse or corruption. DDOT personnel was unable to account for what happens to scrap metal parts removed from coaches during preventative and unscheduled maintenance. Moreover, we find DDOT has not taken advantage of scrap metal disposition option that can potentially generate revenue.

[1] As adopted by a vote of the People November 8, 2011 effective January 1, 2012 Article 7.5 Independent Department's and Offices Chapter 3. Office of Inspector General.

B. Findings

1. An unauthorized hauler truck had access to the scrap bin behind DDOT's main garage.
2. DDOT VMD and MMD were not able to account for parts mechanics removed from DDOT coaches for the period July 1, 2018 through June 30, 2019. This includes parts identified as having been accumulated in the main garage.
3. DDOT's existing policies and procedures do not provide adequate guidance to ensure mechanics and other DDOT personnel properly handle disposition of parts that have scrap value.
4. DDOT does not have a contract with any vendor or internal process to ensure parts removed from coaches can be sold as scrap, which would generate additional revenue for DDOT and by extension the City of Detroit.
5. The City of Detroit's Office of the Chief Financial Officer (OCFO) does not have policies and procedures to monitor the financial and operational inventory controls of departments.

C. Recommendations

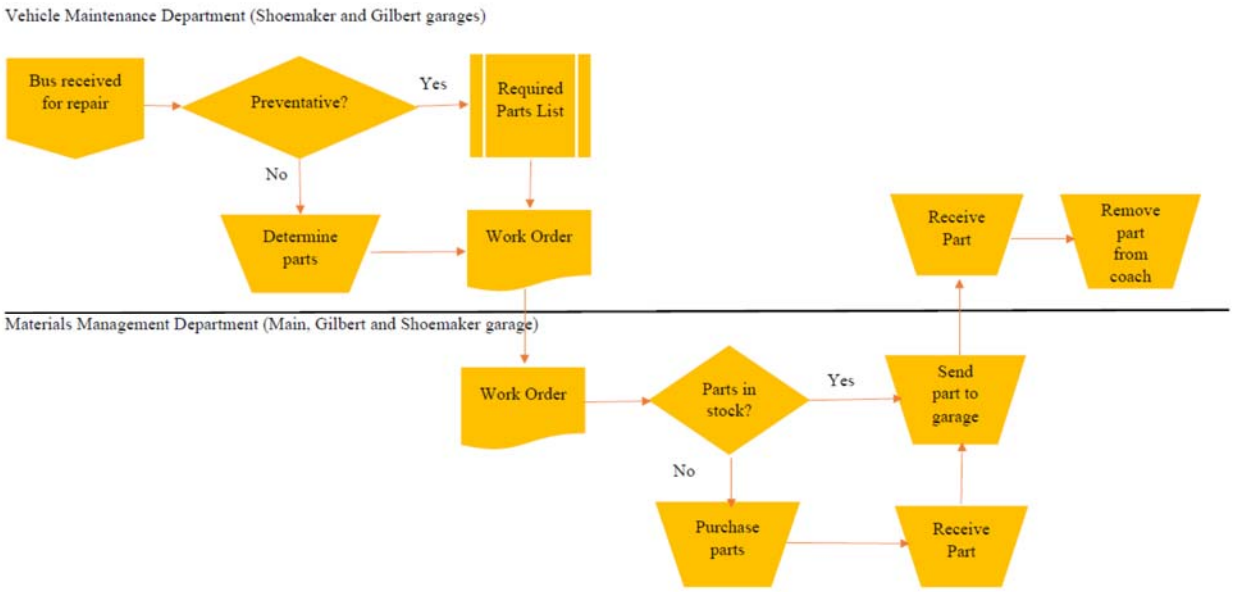
Based on the conditions identified during the audit, the OIG recommends that DDOT:

(1) Establish policies and procedures to restrict unauthorized individuals from obtaining access to the scrap, especially the scrap bin in the yard of the main campus.
(2) Identify all the scrap parts with scrap value, including but not limited to those accumulated in the main garage unit repair area, which mechanics removed from coaches.
(3) Revise the VMD and MMD policies and procedures to formalize employee expectations related to parts with scrap value that VMD mechanics remove from coaches. These policies and procedures should focus on safeguarding parts from waste, fraud, abuse or corruptions.
(4) Work with the OCFO to determine whether it is more cost effective and efficient for DDOT to generate revenue by processing and selling the scrap parts VMD mechanics removes from coaches or to establish a contract with a vendor.
(5) The OCFO establish financial and inventory policies and procedures to monitor and ensure the department efficiently and effectively disposes of scrap parts with scrap value.

III. BACKGROUND

A. DDOT's Current Maintenance Operation

DDOT maintains an active fleet of 288 coaches in accordance with its Fleet Management Plan. VMD is responsible for performing preventative and unscheduled maintenance of coaches. To facilitate these repairs, VMD uses a work order system. Work orders for preventative maintenance activities include listing and identifying parts necessary to perform the repair of the coaches. Generally, the VMD mechanics determine the parts that are required to perform unscheduled maintenance activities. VMD submits the work orders to the MMD. The MMD is responsible for obtaining parts, except engines and transmissions[2]. The MMD then issues the requested parts to each mechanic in the VMD. The following flowchart outlines DDOT's current process:



The flowchart ends with the mechanic removing the part from the coach because the disposition of the parts is unknown.

[2] The Heavy Repair Unit purchases engines and transmissions, both of which are reconditions when repaired. Therefore, they are not scrap items with scrap value.

B. Scrap Parts Generated July 1, 2018 through June 30, 2019

DDOT purchased $8.4 million[3] in replacement parts during the period July 1, 2018 through June 30, 2019. Several of the parts that were replaced have scrap value[4]. According to information provided by Materials Department Manager, Darrell Ragland, the MMD issued approximately 26,528 of the parts to VMD that replaced parts that had scrap value.

C. DDOT Standard Operating Procedure (SOP) – Scrap Parts & Cores Procedure No. MM-21 Effective December 15, 2016

DDOT provided the OIG with its Standard Operating Procedure (SOP) MM-21 issued by the MMD[5]. (See Appendix A.) The SOP indicates that its purpose is to outline "the steps to dispose [of] scrap and core parts." The objective is to "ensure used parts are safe[ly] discarded and cores are recorded." The SOP only addresses DDOT's process related to retuning parts to the vendor for refurbishment, full or partial refund or replacement. While DDOT SOP required MMD to discard the parts mechanics removed from the coaches, the SOP does not address any further action related to parts that are not subject to refurbishment or partial reimbursement (i.e., scrap parts).

DDOT established policies and procedures related to "core parts", which it returns to its vendors for refurbishment (i.e., engines and transmissions.) The vendors return these items to DDOT based on the existing contractual agreements. Furthermore, half way through the audit period, DDOT revised the policy to address the sale of parts mechanics remove from coaches. Due to the timing of the policy revision, the OIG recognizes that DDOT is in the process of establishing the procedures related to the new policy.

D. DDOT Standard Operating Procedure (SOP) – Scrap Parts & Cores Procedure No. MM-21 Effective December 18, 2019

DDOT revised the December 15, 2016 SOP MM-21 on December 18, 2019[6]. The "Purpose" and "Description" of the revised SOP remained the same. The "Method (Process)" section in the 2016 SOP only referred to "core parts," whereas the 2019 policy includes directions regarding selling "scrapped parts." However, this change

[3] According to the City of Detroit Office of Chief Financial Officer (OCFO).

[4] Scrap value is the value of the material(s) the part is made of and/or can be sold for.

[5] See Appendix A

[6] DDOT revised this policy in response to OIG investigation No. 17-0065. See Appendix B

occurred after the audit period, ending June 30, 2019. Mr. Ragland indicated DDOT is in the process of implementing the 2019 policy.

E. Scrap Processing

The value of scrap metal is determined by the type, (either ferrous[7] or nonferrous)[8], and the weight of each item. In this case, DDOT has the option to sell the ferrous and non-ferrous metal parts to:

(1) the vendor for the value of the metal; or
(2) a vendor, who would weigh and sell the parts to a third party for market value of the parts on the date of sale. Then the vendor would remit to DDOT the amount they received from the third party for the parts, less the agreed upon percentage of the transaction as payment for their services. Thus resulting in secondary income for DDOT.[9]

The City of Detroit currently has a contract with a vendor to process scrap metal generated through the General Services Department (GSD) Sign Shop.

IV. FINDINGS AND RECOMMENDATIONS

A. Possible Theft of Scrap in Bins at DDOT Main Garage

Condition: DDOT General Manager, Larry Luckett, stated he once witnessed a "scrap hauler" entering through the DDOT Main Garage gate. Although he was not able to recall the date, Mr. Luckett did recall stopping the truck and asking the purpose for its presence at DDOT. According to Mr. Luckett, the driver indicated he was there to empty the scrap bin. Mr. Luckett did not take any action to prevent the driver's access to the scrap bin. The OIG requested that Mr. Luckett provide the name of the individual driving the truck and/or a description of the truck. However, despite many attempts made by the OIG[10], no further information was provided.

Cause: Neither the DDOT security nor Mr. Luckett denied the hauler access even though DDOT did not have a contract with a vendor to empty the scrap bin.

Effect: The scrap is not adequately safeguarded from theft when DDOT security allows unidentified individuals access to its grounds.

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[7] Ferrous scrap metal – Iron and steel.

[8] Nonferrous metal – Aluminum, copper, lead, tin, zinc etc.

[9] DDOT's primary source of income is fare revenue. Income from the sale of scrap metal would result in secondary income.

[10] Phone calls and emails on April 3rd and April 8th of 2020.

Recommendation: DDOT should establish policies and procedures to prevent unauthorized individuals from obtaining access to the scrap parts at all DDOT facilities. In addition, DDOT Administration should work with the OIG to ensure that the scrap in the bin behind the main garage is not susceptible to theft and establish a clear policy and procedure to ensure DDOT can accurately account for its maintenance or disposition of metal parts.

B. Inability to Account for Parts Removed from Coaches

Condition: During the audit period, DDOT was unable to account for parts mechanics removed from coaches. According to Mr. Luckett, when mechanics remove parts from a coach, they are not required to return the defective parts to MMD. Conversely, Mr. Luckett located several bins of parts, which appears to be sorted and labeled as scrap in the Unit Repair Area of the Main Garage. See photographs below.

Cause: According to Mr. Luckett, he does not know who put the parts there or why. However, he was aware staff stored scrap parts in Unit Repair in years past. Upon OIG's request for details regarding the bins, Mr. Luckett stated employees directed him to the bins when he informed them about the OIG audit. Mr. Luckett did not provide any additional details.

As shown in the above photographs, the labels on the bins clearly identify the parts in each bin, the items are designated by someone as "scrap" and the cumulative weights of the items are labelled in the bins. The separation of the different parts in the bin suggest the metals are separated by type and weight, which are necessary information to sell the scrap parts.

Effect: The photographs also show that some DDOT employees accumulated these scrap parts in Unit Repair. The photographs also evidence that some individuals at DDOT know how to separate the items. However, it serves no purpose if no one at DDOT knows why DDOT is storing the scrap parts and how they are being disposed. DDOT can benefit from the sale of these items or refurbishment of the items.

Recommendation: The OIG recommends DDOT administration monitor the activity of its employees related to the collection and accumulation of parts that have scrap value.

C. Weaknesses in DDOT Standard Operating Procedures

Condition: Mr. Luckett provided the OIG with SOP MM-21[11] related to "scrap and core parts" which was in place during the period July 1, 2018 through June 30, 2019. It is interesting to note the SOP states in part:

> "A number of parts can be reclaimed or rebuilt by an outside vendor. These items should be moved from Unit Repair and gathered in a specific location in the Unit Repair or Central Storeroom."

However, the SOP did not address processing parts with scrap value. Instead, it only focused on sending parts to vendors for rebuilding or reclaiming.[12]

Mr. Luckett subsequently provided the OIG with a revised SOP.[13] The revised SOP addresses the method to process parts with scrap value. However, the policy does not

[11] MM-21 Issued by Materials Maintenance Scrap Parts and Cores Effective Date December 15, 2016

[12] Rebuilt and reclaimed parts are repaired by the vendor, retuned to DDOT and treated like a new part. Any scrap pieces resulting during the repair are the property of the vendor.

[13] MM-21 Issued by Vehicle Maintenance Effective Date December 18, 2019 in response to internal control weaknesses the OIG identified during investigation number 19-0075-INV related to DDOT SOP VM-21.

include controls to ensure mechanics know the specific parts that would have scrap value or procedures to ensure these parts can be tracked to their final destination.

Cause: The SOP does not clearly identify and communicate the parts mechanics should submit parts to MMD which have scrap value. In addition, it does not include controls to ensure that MMD can track parts the mechanics remove from the coaches to the scrap process.

Effect: Due to the absence of the applicable controls, mechanics may, knowingly or unknowingly, discard DDOT scrap parts that has monetary value. Furthermore, mechanics do not record the specific parts they removed from coaches on work orders. Therefore, DDOT would not able to track parts through a clear process to their scraps final destination. The lack of oversight increases the risk of waste.

Recommendation: The MMD and VMD should work together to revise SOP MM-21 to include information necessary to identify the parts mechanics remove from coaches and to track them to the scrap process. Possible inventory control tools include:

(1) a list of parts to which the SOP is applicable;
(2) requiring mechanics to document the information on a "scrap log" or other required documentation when removed; and
(3) requiring mechanics to record the work order number based on which the part was removed on the "scrap weight log" and/or other required documentation.

D. Absence of a Revenue Contract Related to Scrap

Condition: DDOT was not able to benefit from the sale of approximately 26,582 parts, which Mr. Ragland identified as having a monetary value. Mr. Ragland provided the OIG with a list of 87,810 parts MMD issued to VMD for preventative and unscheduled maintenance during the period July 1, 2018 through June 30, 2019. However, according to Mr. Ragland, DDOT did not have a contract with any vendor to process and to sell scrap generated through coach maintenance.

According to Miami Dade Department of Transportation (MDDT) Assistant Service Manager Antonio Abascal, MDDT maintains a revenue contract through which they process parts that result from coach maintenance. The contractor picks up the scrap part monthly, sells the parts and submits payment, less a fee, to MDDT.

Cause: According to Mr. Luckett, the absence of a contract for this purpose was an oversight. He believed there was a City-wide contract for this purpose. However, when Mr. Ragland contacted the Office of Contract and Procurement (OCP), a representative from the OCP was only able to provide him with a copy of the

Department of Public Works contract, which was established for ferrous metal generated through its sign shop.

Effect: DDOT has a potential source for additional revenue from the sale of scrap parts. The OIG contacted NFI Parts, "an industry leading source of transit bus and motor coach parts in North America,"[14] to obtain the weights and components of a sample of parts Mr. Ragland identified. Based on the quantities issued, the OIG estimated the amounts DDOT would have derived from the sale of the sample of parts, using the estimated values on Metalary.com, as follows:

Part[15]	Components[16]	Units Issued [15]	Weights (lbs.) [16]	Value Per lb.[17]	Revenue Range From - To[18]	
Filters (incl. Filter Assemblies, Filter Kits)	Steel, Aluminum and plastic	17,503	7 to 13	$ 0.01	$ 1,225.21	$ 2,275.39
Brake Kits	Steel and ceramic	520	20 to 30	0.01	104.00	156.00
Brake Chamber Assembly	Steel	111	8 to 15	0.01	8.88	16.65
Drums	Steel	390	85 to 100	0.01	331.50	390.00
Shock Absorber	Steel	148	12 to 15	0.01	17.76	22.20
Brake Shoes	Steel and ceramic	785	20 to 30	0.01	157.00	235.50
Diesel Fuel Tank	Plastic	51	50	0.12	306.00	

Recommendation: DDOT administration should work with OCP to contract with a vendor to process DDOT's scrap parts for revenue.

E. Absence of a Citywide Revenue Monitoring Process

Condition: As of the initiation of this audit, the City of Detroit OCFO did not have any policy or procedures to monitor DDOT's handling of parts. According to Mr. Ragland, approximately $8.4 million was spent for DDOT replacement parts[19].

[14] NFI Parts website www.nfi.parts
[15] Darrell Ragland, DDOT Materials Manager, provided the descriptions and number of parts MMD issued to VMD for the period July 1, 2018 through June 30, 2019
[16] Shaun Howell, Account Resolution Coordinator, NFI Parts
[17] Steel Value – Metalary.com, Plastic Value – Recycle Resource 2019 average value
[18] OIG calculated assuming steel is the primary component of compound components.
[19] The OCFO provided the OIG with a list of part purchases in excess of $50,000. This document shows that DDOT total parts purchases for the period July 1, 2018 through June 30, 2019 were in excess of $8.4 million.

Cause: The OCFO was not aware DDOT would have been able to generate revenue through the sale of DDOT scrap parts.

Effect: The OCFO does not have financial and operational inventory controls in place to ensure DDOT effectively and efficiently disposes of parts with scrap value, which would generate additional revenue for the City.

Recommendation: The OCFO should establish policies and procedures to monitor and ensure DDOT and other City Departments benefit from revenue generating opportunities where applicable.

Detroit Department of Transportation
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June 30, 2020

Ellen Ha
Inspector General
65 Cadillac Square, Suite 3210
Detroit, Michigan 48226

RE: Response to the Office of Inspector General (OIG) Audit File No. 20 - 0001-AUD Forensic Audit of Department of Transportation Disposition of Scrap Parts

Dear Ellen Ha:

The Detroit Department of Transportation (DDOT) is in receipt of the aforementioned Office of Inspector General Audit File No. 20 - 0001-AUD related to the disposal of scrap metal parts. Scrap disposal procedures have been reviewed and adjustments have been made in consideration of audit findings. DDOT's response including corrective actions implemented in an effort to improve standard operating procedures, increase oversite and increase operational efficiency are as follows:

FINDING, RECOMMENDATIONS AND RESPONDENT REMARKS

A. Possible Theft of Scrap in Bins at DDOT Main Garage

Condition: DDOT General Manager, Larry Luckett, stated he once witnessed a "scrap hauler" entering through the DDOT Main Garage gate. Although he was not able to recall the date, Mr. Luckett did recall stopping the truck and asking the purpose for its presence at DDOT. According to Mr. Luckett, the driver indicated he was there to empty the scrap bin. Mr. Luckett did not take any action to prevent the driver's access to the scrap bin. The OIG requested that Mr. Luckett provide the name of the individual driving the truck and/or a description of the truck. However, despite many attempts made by the OIG, no further information was provided.

Cause: Neither the DDOT security nor Mr. Luckett denied the hauler access even though DDOT did not have a contract with a vendor to empty the scrap bin.

Effect: The scrap is not adequately safeguarded from theft when DDOT security allows unidentified individuals access to its grounds.

Recommendation: DDOT should establish policies and procedures to prevent unauthorized individuals from obtaining access to the scrap parts at all DDOT facilities. In addition, DDOT Administration should work with the OIG to ensure that the scrap in the bin behind the main garage is not susceptible to theft and establish a clear policy and procedure to ensure DDOT can accurately account for its maintenance or disposition of metal parts.

DDOT Response

i. The department has addressed this concern in its original response to OIG on December 17, 2019. DDOT only has scrap metal containers in the yard at the Warren location. Both satellite locations (Gilbert and Shoemaker) transport scrap metal to the Warren office daily. The Warren location has secured the gate entrance located on the I-75 service drive and a security guard is now located at the Russell entrance.

ii. DDOT has already taken additional measures to ensure the scrap in the containers at the main office is not susceptible to theft or misappropriation.

iii. A SOP including clear policies and procedures has been established to prevent future concerns related to this matter as described by Larry Luckett above. SOP MM21 was provided to the OIG on December 17, 2019

B. Inability to Account for Parts Removed from Coaches

Condition: During the audit period, DDOT was unable to account for parts mechanics removed from coaches. According to Mr. Luckett, when mechanics remove parts from a coach, they are not required to return the defective parts to MMD. Conversely, Mr. Luckett located several bins of parts, which appears to be sorted and labeled as scrap in the Unit Repair Area of the Main Garage. See photographs below.

Cause: According to Mr. Luckett, he does not know who put the parts there or why. However, he was aware staff stored scrap parts in Unit Repair in years past. Upon OIG's request for details regarding the bins, Mr. Luckett stated employees directed him to the bins when he informed them about the OIG audit. Mr. Luckett did not provide any additional details.

As shown in the above photographs, the labels on the bins clearly identify the parts in each bin, the items are designated by someone as "scrap" and the cumulative weights of the items are labelled in the bins. The separation of the different parts in the bin suggest the metals are separated by type and weight, which are necessary information to sell the scrap parts.

Effect: The photographs also show that some DDOT employees accumulated these scrap parts in Unit Repair. The photographs also evidence that some individuals at DDOT know how to separate the items. However, it serves no purpose if no one at DDOT sale knows why DDOT is storing the scrap parts and how they are being disposed. DDOT can benefit from the of these items or refurbishment of the items.

Recommendation: The OIG recommends DDOT administration monitor the activity of its employees related to the collection and accumulation of parts that have scrap value.

DDOT Response

i. Maintenance Superintendents are responsible for overseeing that procedures related to the disposal of scrap parts is adhered to as required by SOP MM-21. This includes monitoring employee's activity related to the collections of scrap parts.

C. Weaknesses in DDOT Standard Operating Procedures

Condition: Mr. Luckett provided the OIG with SOP MM-21 related to "scrap and core parts" which was in place during the period July 1, 2018 through June 30, 2019. It is interesting to note the SOP states in part:

"A number of parts can be reclaimed or rebuilt by an outside vendor. These items should be moved from Unit Repair and gathered in a specific location in the Unit Repair or Central Storeroom."
However, the SOP did not address processing parts with scrap value. Instead, it only focused on sending parts to vendors for rebuilding or reclaiming.[12]

Mr. Luckett subsequently provided the OIG with a revised SOP.[13] The revised SOP addresses the method to process parts with scrap value. However, the policy does not include controls to ensure mechanics know the specific parts that would have scrap value or procedures to ensure these parts can be tracked to their final destination.

Cause: The SOP does not clearly identify and communicate the parts mechanics should submit parts to MMD which have scrap value. In addition, it does not include controls to ensure that MMD can track parts the mechanics remove from the coaches to the scrap process.

Effect: Due to the absence of the applicable controls, mechanics may, knowingly or unknowingly, discard DDOT scrap parts that has monetary value. Furthermore, mechanics do not record the specific parts they removed from coaches on work orders. Therefore, DDOT would not able to track parts through a clear process to their scraps final destination. The lack of oversight increases the risk of waste.

Recommendation: The MMD and VMD should work together to revise SOP MM-21 to include information necessary to identify the parts mechanics remove from coaches and to track them to the scrap process. Possible inventory control tools include:

(1) a list of parts to which the SOP is applicable;
(2) requiring mechanics to document the information on a "scrap log" ore other required documentation when removed; and
(3) requiring mechanics to record the work order number based on which the part was removed on the "scrap weight log" and/or other required documentation.

DDOT Response

i. The DDOT has previously provided a list of all parts with and without scrap value.
ii. SOP MM21 has been revised to include the following: Mechanic's will notate all parts removed from buses on the work order.

iii. Parts will be logged by the Storekeeper at each location and transported to the main office.

iv. Reclaimed parts are tagged and returned to the vender for core credit which is reported to DDOT accounting.

v. Disposal parts are placed in the scrap container and disposed of in accordance with SOP MM21.

D. Absence of a Revenue Contract Related to Scrap

Condition: DDOT was not able to benefit from the sale of approximately 26,582 parts, which Mr. Ragland identified as having a monetary value. Mr. Ragland provided the OIG with a list of 87,810 parts MMD issued to VMD for preventative and unscheduled maintenance during the period July 1, 2018 through June 30, 2019. However, according to Mr. Ragland, DDOT did not have a contract with any vendor to process and to sell scrap generated through coach maintenance.

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Cause: According to Mr. Luckett, the absence of a contract for this purpose was an oversight. He believed there was a City-wide contract for this purpose. However, when Mr. Ragland contacted the Office of Contract and Procurement (OCP), a representative from the OCP was only able to provide him with a copy of the

Department of Public Works contract, which was established for ferrous metal generated through its sign shop.

Effect: DDOT has a potential source for additional revenue from the sale of scrap parts. The OIG contacted NFI Parts, "an industry leading source of transit bus and motor coach parts in North America," to obtain the weights and components of a sample of parts Mr. Ragland identified. Based on the quantities issued, the OIG estimated the amounts DDOT would have derived from the sale of the sample of parts, using the estimated values on Metalary.com, as follows:

Recommendation: DDOT administration should work with OCP to contract with a vendor to process DDOT's scrap parts for revenue.

DDOT Response

i. In December 2019 the city-wide contract with Ferrous Processing and Trading was amended by OCP to include the Detroit Department of Transportation. Please see the amendment signed by Angelica Jones, Interim Director. The current contract is slated to be renewed after its expiration on July 31, 2020.

ii. The Department disputes the list provided by Mr. Ragland was exclusively metal parts that hold scrap value. It appears that the list was inclusive of non-metal, non-scrapable

parts like wind shields, filters and headlights which all require environmentally friendly disposal. Therefore, the estimated monetary value is grossly inaccurate.

iii. The current process does generate revenue for the Department when core parts and scrap metal are sold for recycle.

In conclusion, it is the Departments position that it has made the necessary procedural adjustments to dispel all previously stated concerns related to this matter. Larry Luckett, Assistant Director of Maintenance will continue to monitor the situation and make procedural changes as needed to facilitate continuous improvement.

Best regards,

C. Mikel Oglesby
Executive Director Transit
City of Detroit
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CITY OF DETROIT
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July 1, 2020

Ellen Ha, Esq., CIG Inspector General
Office of Inspector General
65 Cadillac Square, Suite 3210
Detroit, MI 48226

Dear Ms. Ha:

The following presents the Department's response for the indicated finding and related recommendation in the forensic audit of the Department of Transportation Disposition of Scrap Parts prepared by the Office of Inspector General.

B. Findings

5. The City of Detroit's Office of the Chief Financial Officer (OCFO) does not have policies and procedures to monitor the financial and operational inventory controls of departments.

C. Recommendations

(5) The OCFO establish financial and inventory policies and procedures to monitor and ensure the department efficiently and effectively disposes of scrap parts with scrap value.

OCFO Response

The OCFO will work with each relevant department to develop policies and procedures related to the sale of disposable assets.

Sincerely,

David Massaron
Chief Financial Officer, City of Detroit

IV. OIG Reply to Departmental Responses

The Office of Inspector General (OIG) appreciates the timely responses of the Department of Transportation (DDOT) and Office of the Chief Financial Officer (OCFO). Furthermore, the OIG acknowledges the corrective action the DDOT and OCFO administrations plan to or have already implemented during and after the completion of the OIG audit.

However, DDOT's response concludes by stating it "…has made the necessary procedural adjustments to dispel all previously stated concerns related to this matter." The OIG disagrees with the DDOT's statement for the following reasons:

- DDOT responded that it addressed the concerns in finding #1 on December 17, 2019. However, SOP MM-21, as revised on December 18, 2019, does not address the safeguarding of the scrap bin at the Warren location. (See Appendix B) These measures should be covered in an SOP issued by the Security Division. Further, DDOT did not provide any evidence or specific proof, which would support its position
- DDOT responded that its Maintenance Superintendents are responsible for overseeing the procedures related to the disposal of scrap parts. However, the scrap parts were not recycled and the DDOT provided no evidence that Maintenance Superintendents are recycling DDOT's scrap parts. Instead, based on the OIG's investigation, DDOT scrap parts are simply being accumulated in the DDOT Main Garage, as pictured in the OIG's report. While DDOT makes the assertion that Maintenance Superintendents are responsible for overseeing DDOT's disposal of its scrap parts, DDOT does not provide any evidence to support its response.
- DDOT's response indicates that it provided a list of scrap parts eligible for recycling to the OIG. However, DDOT did not indicate the list was incorporated into SOP MM-21. The OIG's recommendation refers to DDOT revising SOP MM-21 to include a list of scrap parts to which the SOP is applicable. Therefore, DDOT has not corrected the condition OIG identified in the finding.
- DDOT's response states the City of Detroit amended a "city-wide" contract with Ferrous Processing and Trading. However, the original contract was not "city-wide, it was between the Department of Public Works and the vendor. DDOT has not provided any evidence to confirm that DDOT was added to the contract.
- The response disputes the accuracy of the scrap parts list DDOT provided to the OIG. On February 24, 2020, we sent an email[1] to Mr. Ragland and Mr. Luckett to provide the OIG with a list of scrap parts that were eligible for recycling. Mr. Ragland responded by providing a list of scrap parts: eligible for recycling, partially eligible for recycling, refurbishable, or eligible for recycling. If Mr. Luckett believed the list was incorrect, he had the opportunity to review and change the list at that time. He did not. OIG included Mr. Luckett on the email as Mr. Ragland's supervisor to ensure

[1] February 24, 2020 email to Darrell Ragland and Larry Luckett with list of parts attached

he was aware of the information Mr. Ragland shared with the OIG. OIG relied on the list based on the expertise of the DDOT's Materials Manager. DDOT has provided no evidence to prove the list we received from Mr. Ragland is inaccurate. Finally, the response alleges DDOT receives revenue through core parts and scrap metal sold for recycle. However, again, we note the DDOT did not provide any evidence to support its position.

In conclusion, the OIG appreciates the cooperation of the DDOT and OCFO administrations and employees. The OIG will assess the effectiveness of the scrap metal process including corrective actions sited in the responses during a follow-up audit related to this report.

Standard Operating Procedure		Procedure No: MM-21	Page: 2 Page 1 of 2
SCRAP PARTS & CORES		Supersedes:	Rev. No.:
Issuing Department: Materials Management Division	Approval: _____ Materials Manager	Previous Rev. Date:	Effective Date: December 15, 2016

Table of Contents

1.0 Purpose of Procedure

The procedure outline the steps to dispose scrap and core parts.

2.0 Procedural Objective

The objective of the procedure is to ensure used parts are safety discarded and cores are recorded.

3.0 Scope of Application

The scope of this procedures applies to Material Management Storekeepers.

4.0 Definitions

Scrap Part – means waste and discarded metal or parts.

Core – means a core is any component which can either be rebuilt by the Unit Repair Shop or by an outside vendor.

Stores Receipt Voucher (SRV) – means a stores receipt voucher that list the part number, part description, quantity, vendor name and purchase order of reclaim cores.

Unit Repair Shop – A physical location where scrap parts are kept.

5.0 Method (Process)

1. All cores shall be returned to the Unit Repair Shop for either scrapping, rebuild or reclamation. If any doubt exists as to whether a unit can be rebuilt or reclaimed, the unit should be tagged and sent to the Unit Repair Shop. Unit Repair is solely responsible for determining the status of core units including the option that the unit be scrapped.
2. All core units shall be shipped on a daily basis to the Central Storeroom.
3. The core units shall be tagged with the bus number from which the core came, the reason the core was removed, the date of removal, the mileage on the bus from which the unit came at the time it was removed and a red warranty tag, if the part is still under warranty.
4. Once the cores have been received by the Central Storeroom, they are to be sent immediately to the Unit Repair Shop which is responsible for determining, whether the core can be rebuilt or reclaimed and the storage of the units.
5. A number of parts can be reclaimed or rebuilt by an outside vendor. These items should be moved from Unit Repair and gathered in a specific location in the Unit Repair or Central Storeroom.
6. Once there is a need for the item and a significant number of components have accumulated, the Central Warehouse shall prepare a stores receipt voucher (SRV) and notify Contracting and Procurement that a purchase order is needed.
7. Contracting and Procurement shall send the purchase order to the selected vendor, release the SRV that was created by the Central Warehouse and notify the vendor to arrange with the vendor for the pickup or shipment of the items.
8. If the items are picked up directly by the vendor, the Central Warehouse shall have the vendor, sign and date the SRV indicating the vendor's receipt of the material.
9. If the items are shipped to the vendor, the Central Warehouse shall arrange the shipment of the items. A copy of the SRV shall be packed with the parts to serve as a packing slip.
10. If the item was non reclaimable and scrapped, the order quantity shall be reduced on the purchase order by Contracting and Procurement.
11. Incoming reclaimed parts shall be treated the same as new parts.

6.0 Supporting Form/Checklist

Stores Receipt Form

7.0 Roles and Responsibilities

It is the responsibilities of Vehicle Maintenance to transport the scrap from the Satellites locations to Central Warehouse.

It is the responsibilities of the Stores Operations Supervisor or Materials Manager to contact Contracting and Procurement to generate a purchase order and to complete the SRV.

The Storekeeper to verify the quantities of reclaim cores and to transport the scrap bins to Unit Repair.

8.0 Related Documentation

There are no related documentation/procedures that provide additional information, guidance, etc.

9.0 Authority/Regulation

There are no authorizing legislation and/or regulations that give the legal basis for the SOP (i.e. Federal legislation, FTA Circulars, City ordinances, etc.)

10.0 Records

This policy is will be kept in the Materials Management Division Policy Manual located in the Materials Manager office.

Standard Operating Procedure		Procedure No: MM-21	Page 1 of 3
SCRAP PARTS & CORES		Supersedes:	Rev. No.: 1
Issuing Department: VEHICLE MAINTENANCE	Approval: LAWRENCE LUCKETT Assistant Director	Previous Rev. Date: December 15, 2016	Effective Date: December 18, 2019

Table of Contents

1.0 Purpose of Procedure

The purpose of this procedure is to outline the steps to dispose scrap and core parts.

2.0 Procedural Objective

The procedural objective is to ensure used parts are safely discarded and cores are recorded.

3.0 Scope of Application

The scope of the procedures applies to the duties of the Material Management Storekeepers as it relates to the scrapping process at DDOT.

4.0 Definitions

Scrap Part –waste and discarded metal or parts.

Core – any component which can either be rebuilt by the Unit Repair Shop, or by an outside vendor.
Scrap Weight Log (SWL) – a log of the weights of all recorded scrapped parts.
Stores Receipt Voucher (SRV) – a voucher that lists the part number, part description, quantity, vendor name and purchase order of reclaimed cores.
Unit Repair Shop – The physical location where core parts are kept.

5.0 Method (Process)

1. All cores shall be returned to the **Central Warehouse** for either scrapping or reclaiming. Garage **Storekeepers** will return all cores and scrapped parts to Central Warehouse on a weekly basis, (via the dock delivery truck).
2. Once the cores and scrap have been **received by the Central Warehouse**, they will determine if the parts can be reclaimed or scrapped.

SCRAPPED PARTS:

3. Parts are put in to the scrap bins and weighed **at the Central Warehouse**, and later placed into the vendor's dumpster. The weights are recorded, in the Scrap Weight Log (SWL).
4. **Central Warehouse** shall keep a log of all weights, and their recorded dates.
5. Once the scrap weight in the dumpster is full, Manager/Supervisor will **contact the scrap vendor** to schedule a pickup. At that time, Manager/Supervisor will also be responsible for completion of a **Store Receipt Voucher (SRV)**, and issue a copy to the vendor. Once the scrap dumpster is picked up by the vendors scrap truck, it will be escorted by the Materials Manager or Stores Operations Supervisor to City of Detroit weight scale and then weighed for verification. Upon completion, DDOT and vendor shall then receive its copy of the ticket showing its weight content. The vendor shall then take the scrap to the scrap yard.
6. All weight tickets will be kept on file. The vendor will **issue a monetary check to City of Detroit DDOT** for the total value of the scrap being picked up.

RECLAIMED PARTS:

7. A number of parts can be reclaimed by an outside vendor. These items shall be stored **Central Warehouse**.
8. Once there is a need for the part and a significant number of cores have been accumulated, the **Central Warehouse shall prepare a Stores Receipt Voucher (SRV)**, and complete a request to Procurement that a Purchase Order is needed.

9. **Procurement shall send the Purchase Order** to the part's vendor, **to arrange for the pick-up or shipment** of the core parts.
10. If the **core parts are picked up** directly by the vendor, the Central Warehouse shall have the vendor, sign and date the SRV, indicating the vendor's receipt of the material.
11. If the **core parts are shipped** to the vendor, the Central Warehouse shall arrange for shipment of the core parts. A copy of the SRV shall be included with the parts to serve as a packing slip.
12. Central Warehouse will keep a log of all scrapped parts and cores sent to the vendors.

6.0 Supporting Form/Checklist

Stores Receipt Voucher (SRV), Scrap Weight Log (SWL)

7.0 Roles and Responsibilities

It is the responsibilities of **Vehicle Maintenance** to transport the scrap from the Satellite location to the Central Warehouse.

It is the responsibilities of the **Materials Manager or Stores Operations Supervisor** to contact Contracting and Procurement to generate a Purchase Order and to complete the SRV.

It is the responsibilities of the **Storekeeper** to verify the quantities of reclaimed cores, and to transport the scrapped parts (in the scrap bins) to Unit Repair.

8.0 Related Documentation

There are no related documentation/procedures that provide additional information, guidance, etc.

9.0 Authority/Regulation

There are no authorizing legislation and/or regulations that give the legal basis for the SOP (i.e. Federal legislation, FTA Circulars, City ordinances, etc.)

10.0 Records

This policy will be kept in the Materials Management Division Policy Manual, located in the Materials Manager office. It is also kept in the Compliance Department of DDOT.

FORM 682041
U.S.A.

86149

CITY OF DETROIT - DEPARTMENT OF TRANSPORTATION
STORES RECEIPT

Storeroom _____ Date _____

The following materials received from the DEPARTMENT OF TRANSPORTATION:

Quantity	Classification Number	Description of Material	Date Received	Received on Pur. Order

From Stock _____ Quantity From Using Department _____ Quantity

Firm _____ Received by _____

Address _____ Shipped Via _____

Reason for Withdrawal:	Disposition:
For Repairs _____	Repaired on P.O. No. _____
Returned for Credit _____	Applied on P.O. No. _____
For Replacement _____	Date Replaced _____ P.T. No. _____ Rec. Slip No. _____
For Sale of Material or Equipment _____	Sale Order No. _____
For Other Reasons _____	

_____
Senior Storekeeper

WAREHOUSE DIVISION

SCRAP WEIGHT LOG OUTGOING

DATE OF SCRAP PICKUP	PRINT NAME	SIGNATURE	WEIGHT

SCRAP WEIGHT LOG INCOMING

DATE OF SCRAP ARRIVAL AT MAIN WAREHOUSE	LOCATION SENT FROM	SENDING STOREKEEPER	RECEIVING STOREKEEPER	WEIGHT

	Desciption
1	***** USE 31NF060004*****
2	****USE 71NF060018****
3	ABSORBER ASSY,SHOCK FRONT
4	ABSORBER ASSY,SHOCK REAR SHORT
5	ABSORBER,SHOCK FRT FSD KONI
6	ABSORBER,SHOCK REAR FSD KONI
7	ACCELERATOR ASSY, ELECTRONIC
8	ACCELERATOR ASSY,ELECTRONIC
9	ACCELERATOR,ELECTRONIC
10	ACCUMLATOR,TRANS,BD(4)00R/W4TH
11	ACCUMULATOR,INSTALLATION
12	ACTUATOR, FUEL CUMMINS ONLY
13	ACTUATOR, TURBO HYBRID
14	ACTUATOR,TUR ELECTRIC 12V
15	ACTUATOR,TUR ELECTRIC 24V
16	ACTUATOR,TURBOCHRGR KIT DIESEL
17	ADJUSTER KIT,SLACK REAR L&R
18	ADJUSTER KIT,SLACK RH FRT
19	ADJUSTER,SLACK AUTO RR LH
20	ADJUSTER,SLACK AUTO RR RH
21	ADJUSTER,SLACK LEFT FRONT
22	AIR COMPRESSOR ASSY
23	AIR SPRING, BELLOW
24	ALTENATOR,50DN 24V 270A
25	ALTENATOR,C706 28V 300A N/FAN
26	ALTERNATOR ASSY,24V
27	ALTERNATOR ASSY,EMP 450W/PULLE
28	ALTERNATOR PULLEY,IDLER
29	ANGLE,MOUNTING
30	ARM ASSY, TIE ROD LH
31	ARM ASSY, TIE ROD RH
32	ARM ASSY,DOOR LH WIPER W/LNKG
33	ARM ASSY,TIE ROD LH
34	ARM ASSY,TIE ROD RH
35	ARM,MIRROR CURBSIDE ASSY
36	ARM,MIRROR DRIVER SIDE(STREET)
37	ARM,STEERING FRT LH
38	ARM,STEERING LH
39	ARM,TIE ROD CURBSIDE
40	AUXILIARY COOLANT HTR ASM, 24V
41	BAR ASSY, EMERGENCY RELEASE
42	BATTERY SLIDER ASSY
43	BATTTERY SLIDER ASSY
44	BEAM, BENT
45	BEARING ASSY,FRONT KNUCKLE
46	BEARING ASSY,HUB UNIT

	Desciption
47	BEARING ASSY,THRUST
48	BEARING ASSY,WHEEL HUB REAR
49	BEARING,FRONT INNER TAPER
50	BEARING,FRONT OUTER TAPER
51	BEARING,INNER/FRONT WHEEL HUB
52	BEARING,OUTER/FRONT WHEEL HUB
53	BEARING,REAR ANCHOR PLATE
54	BEARING,ROD
55	BELT TENSIONER (HYBRID ONLY)
56	BELT TENSIONER, CURBSIDE
57	BELT TENSIONER, STREETSIDE
58	BIKE RACK ASSY SPRORTWRKS ONLY
59	BLOWER ASSY,24 VOLT
60	BLOWER ASSY,24V
61	BLOWER ASSY,24V DRIVERS
62	BLOWER ASSY,EVAPORATOR LH 24V
63	BLOWER REPLACEMENT KIT
64	BLOWER,ASSY 24 V
65	BLOWER,DEFROSTER MOTOR 24VOLT
66	BOLT, AIR GOV. M8-1.25X70MM
67	BOLT, EYE
68	BOLT, HEX
69	BOLT, HEX 1-14 X 16 6 GR 8
70	BOLT, HEX 5/8"-11 UNC X 4 9/16
71	BOLT, HXHD 5/8"-18 X2.25" LG
72	BOLT, M10 X 1.5 X 70MM
73	BOLT, M12 X 1.75 X 90MM
74	BOLT, M18 X 1.5" X 100
75	BOLT, TORX M18 X 1.5 X 60
76	BOLT,1.0"-14X4.5" GR8
77	BOLT,1/2"-13X2 LG ALTERNATOR
78	BOLT,BUTTON HEAD TORX M8
79	BOLT,BUTTON TORX HEAD
80	BOLT,BUTTON TORX HEAD 30MM
81	BOLT,CALIPER
82	BOLT,CAP SPIDER AXLE/FRONT
83	BOLT,CARRIAGE 1/4'-20 UNCX2'LG
84	BOLT,HEX
85	BOLT,HEX 3/4 UNCX12 LONG
86	BOLT,HEX 3/4"-10UNC X 4 1/2"LG
87	BOLT,HEX 3/4"-10UNCX5 1/2"LG
88	BOLT,HEX 3/4-10 UNCX3 1/2"LG
89	BOLT,HEX 3/4-10UNCX4"LG
90	BOLT,HEX 5/8"-11UNCX5 2.50"LG
91	BOLT,HEX M10
92	BOLT,HEX M10 X 35

	Desciption
93	BOLT,HEX M18 X 1.5 X 65
94	BOLT,HEX M20 X 2.5MM X 80MM LG
95	BOLT,HEX M20X1.5X60
96	BOLT,HEX M24X1.5MM 90LG
97	BOLT,HXHD 5/8"-18 X 4.0" GR8
98	BOLT,HXHD M12 1.75 X 25LLG
99	BOLT,HXHD M12 1.75 X 35LG
100	BOLT,M10 X 1.5 MM X 35MM
101	BOLT,MOUNTING WHEEL M22X1.5X79
102	BOLT,RAD ROD ATTACHING
103	BOLT,RADIATOR HEX #83/8-16X2
104	BOLT,RADIUS ROD M22X1.5 FRONT
105	BOLT,SERRATED LOCKING
106	BOLT,TORX M18 X 1.5 X 60
107	BOLT,WHEEL MOUNTION REAR
108	BOOSTER ASSY,DRIVER FAN 24V
109	BOOSTER PUMP ASSY, 24V
110	BOOSTER PUMP ASSY, 27V
111	BRACE,TAIL SUPPORT
112	BRACKET
113	BRACKET ASSY, CURBSIDE MOUNT
114	BRACKET ASSY,AIR TUBE
115	BRACKET ASSY,BRAKE CHAMBER RH
116	BRACKET ASSY,FRT BRK CHAMBER
117	BRACKET ASSY,WELDED W/C/L
118	BRACKET GAS SPRING MTG LOWER
119	BRACKET, COMPRESSOR MOUNTING
120	BRACKET, DISPLAY
121	BRACKET, MOUNTING
122	BRACKET, RAD BRACE MTG
123	BRACKET,ABS SENSOR
124	BRACKET,ALTERNATOR
125	BRACKET,BRAKE CHAMBER RH
126	BRACKET,BUMPER FRONT LEFT
127	BRACKET,BUMPER FRONT RIGHT
128	BRACKET,FRT BRK CHAMBR RH ASSY
129	BRACKET,GAS SPRING MTG
130	BRACKET,GAS SPRING MTG UPPER
131	BRACKET,HYD RESERVOIR SPACER
132	BRACKET,INTERIOR MIRROR
133	BRACKET,LEVELING VALVE
134	BRACKET,MOUNTING
135	BRACKET,MTG LH EXT
136	BRACKET,MTG RH EXT
137	BRACKET,PIVOT BIKE RACK
138	BRACKET,REAR ABS SENSOR

	Desciption
139	BRACKET,SLIDE-IN SLIDE-OFF KIT
140	BRACKET,SLIDE-IN STAND-OFF
141	BRACKET,STREETSIDE MOUNTING
142	BRAKE CHAMBER ASSY, CENTER
143	BRAKE CHAMBER ASSY,FRONT
144	BRAKE CHAMBER ASSY,FRT CS 24L
145	BRAKE CHAMBER ASSY,FRT SS 24L
146	BRAKE CHAMBER ASSY,RR T24(2-4)
147	BRAKE CHAMBER,REAR
148	BRAKE KIT,FRT/REAR
149	BRAKE TREADLE ASSY
150	BRAKE,CHAMBER LH FRT
151	BRAKE,CHAMBER RH FRT
152	BRAKE,DISC CTR AXLE CS ASSY
153	BRAKE,DISC CTR AXLE SS ASSY
154	BRAKE,PAD KIT FRONT
155	BUZZER,ALARM W/C PUMP
156	CAMSHAFT ASSY,BRAKE FRONT LH
157	CAMSHAFT ASSY,BRAKE FRONT RH
158	CAMSHAFT ASSY,BRAKE REAR LH
159	CAMSHAFT ASSY,BRAKE REAR RH
160	CAMSHAFT,BRAKE LH FRONT
161	CAMSHAFT,BRAKE RH FRONT
162	CAMSHAFT,LH FRONT
163	CAMSHAFT,LH REAR
164	CAMSHAFT,REAR BRAKE C/S
165	CAMSHAFT,REAR BRAKE R/S
166	CAMSHAFT,RH FRONT
167	CAMSHAFT,RH REAR
168	CANISTER,DESICCANT
169	CARRIER ASM, W/YOKE
170	CARRIER ASSY KIT,DIFFERENTIAL
171	CARTRIDGE ELEMENT,POWER STEERI
172	CASING,BLOWER RH EVAPORATOR
173	CATALYST,MODULAR EXHAUST UPPER
174	CATALYST,MODULE EXHAUST SHORT
175	CENTER LINKS ASSEMBLY
176	CENTER PIVOT
177	CHAIN SPACER, BLOCK
178	CHAIN, ROLLER #41 X 36 LG
179	CHAMBER ASSY,REAR BRAKE LH
180	CHAMBER ASSY,REAR BRAKE LH/RH
181	CHAMBER ASSY,REAR BRAKE RH
182	CHIME ASSY,PASSENGER SIGNAL
183	CLAMP ASSY,AIR INTAKE ENGINE
184	CLAMP, CONST T-BOLT 3"

	Desciption
185	CLAMP, SADDLE
186	CLAMP,3/4" HOSE
187	CLAMP,5"
188	CLAMP,BAND DPF MTG
189	CLAMP,BREEZE 2.25"-3/13/" DIA
190	CLAMP,CONSTANT TENSION HOSE
191	CLAMP,EXHAUST
192	CLAMP,EXHAUST 4.75 ID
193	CLAMP,EXHAUST 40'V-BAND
194	CLAMP,EXHAUST SYSTEM 6"
195	CLAMP,HOSE 0.31"
196	CLAMP,SEAL EXHAUST 5.0"
197	CLAMP,SEAL EXHAUST SYSTEM 4.0"
198	CLAMP,T-BOLT W/SPRING AIR
199	CLAMP,TILLER LINE PASSENGER
200	CLAMP,V BAND
201	CLAMP,V BAND EXH. OUTLET
202	CLAMP,V BAND EXHAUST SYSTEM
203	CLAMP,V BAND,AIR INTAKE
204	CLAMP,V-BAND 4.75"
205	CLAMP,V-BAND AIR TRANSFER CONN
206	CLAMPS,RADIATOR COOLER TUBE
207	CLUSTER IP ASSY
208	CLUTCH ASSY,24 VDC 2-5V GROOVE
209	CLUTCH ASSY,24V DC
210	CLUTCH ASSY,W/COIL A/C 24 VOLT
211	COIL,CLUTCH ASSY A/C 24 VOLT
212	COIL,HEATER
213	COIL,UNLOADER
214	CONE,OUTER HUB DRUM ASSY
215	CONVERTER,DC-DC
216	COOLANT LEVEL SENSOR MODULE
217	COOLER,EGR SQUARE WINTEGRAL
218	COOLER,EXHAUST GAS RCN
219	COOLER,EXHAUST GAS RCN HYBRID
220	CORE,COOLER
221	COUPLING HALF,12MM BORE SST 4M
222	COUPLING INSERT, HYTREL
223	COUPLING,PLANETARY FINAL DRIVE
224	COVER, HINGE
225	COVER,DOOR POST
226	COVER,LUB OIL COOLER
227	COVER,RESEVOIR WASHER BOTTLE W
228	CUP,INNER BEARING/FRONT WHEEL
229	CUP,OUTER BEARING/FRONT WHEEL
230	DAMPER,SHORT STEERING W/SLEEVE
231	DEF TANK ASSY
232	DEF,FAST 330
233	DOOR ASSY, ACCESS
234	DOOR ASSY, BATTERY ACCESS
235	DOOR ASSY, FUEL FILLER ACCESS
236	DOOR ASSY, RTRN AIR GRIL & HVA
237	DOOR ASSY, SIDE CONSOLE ACCESS
238	DOOR ASSY, SURGE TANK ACCESS
239	DOOR ASSY,BATTERY ACCESS
240	DOOR ASSY,FUEL FILLER ACCESS
241	DOOR ASSY,FUSEBOX ACCESS
242	DOOR ASSY,RADIATOR ACCESS
243	DOOR ASSY,RADIUS ROD ACCESS
244	DOOR ASSY,REAR ENGINE
245	DOOR ASSY,SURGE TANK
246	DOOR ASSY,UPPER PILLAR SS
247	DOOR SHAFT AND ARM ASSY FORE
248	DOOR SHAFT ARM ASSY,AFT
249	DOWEL,TAPERED
250	DPF ASSY
251	DRAG LINK ASSY
252	DRAGLINK,ASM
253	DRAIN PLUG,#6.5AE
254	DRIVE SHAFT
255	DRIVESHAFT ASM, 1710 HYBRID
256	DRIVESHAFT,1710 1/2 RND
257	DRUM,BRAKE FRONT
258	DRUM,BRAKE FRT BALANCED HUB
259	DRUM,BRAKE REAR AXLE ASSY
260	DRUM,FRT BRAKE 6X16.5
261	DRUM,REAR BRAKE
262	DRUM,REAR BRAKE 14-1/2 BAL
263	END ASM,RH TIE ROD
264	END ASSY,TIE ROD
265	END,DRAG LINK RH
266	END,ROD 3/4" MALE LH REFRIG
267	END,TIE ROD L/H
268	ENGINE STRUT, CURBSIDE
269	EQUALIZER,BATTERY
270	EQUALIZER,BATTERY 80A
271	EQUALIZER,BATTERY 80A N/FII
272	EVAPORATOR FAN ASSY
273	EXTR CHASSIS POST 4.72
274	EXTR, VERTICAL REAR SSLF ANODI
275	EXTR.,A-POST,SSLF W/ANODIZED
276	FITTING, ADJUSTABLE SST

	Desciption
277	FITTING, COUPLER 5/16"
278	FITTING, FLOOR CUP
279	FITTING,46MM
280	FITTING,56MM
281	FITTING,GREASE 45 DEG M8X1MM
282	FITTING,STANCHION CUP
283	FLANGE,4 BOLT-10 MJIC
284	FLATWASHER
285	GEAR ASSY,PLANETARY
286	GEAR ASSY,STEERING
287	GEAR MOTOR,ASSY
288	GEAR,SUN ASSY PLANETARY
289	GEAR,SUN CURBSIDE
290	GEAR,SUN STREETSIDE
291	GOVERNOR ASSY
292	HARDWARE KIT,SHOCK ABSORBER
293	HARDWARE,AISLE & FORWARD FACE-
294	HEAD ASSY,LH
295	HEAD ASSY,RH
296	HEAD,CYLINDER
297	HEAD,FUEL PUMP
298	HEAD,LUB OIL FILTER
299	HEAD,WATER FILTER
300	HEX SOC HD SHOULDER SCREW SET
301	HINGE ASM,BELT GUARD
302	HINGE ASSY
303	HINGE PIN
304	HINGE, ACCESS DOOR
305	HINGE, DOUBLE
306	HINGE, SCISSOR CURBSIDE
307	HINGE, SCISSOR STREETSIDE
308	HINGE,FUEL FILL ACCESS DOOR
309	HINGE,SKIRT LH 77"
310	HINGE,SKIRT PANEL 65"
311	HINGE,SKIRT RH 117"
312	HOLD DOWN,BATTERY
313	HUB & BEARING ASSY W/PULSE WHL
314	HUB ASM,REAR W/CUPS & STUDS
315	HUB ASSY,REAR
316	HUB,FRONT AXLE
317	HUB,REAR AXLE
318	HUB/CUP,FRONT ASSY
319	KEY, SQUARE 3/16" X 3/4" LG
320	KEY,PANEL ACCESS TOOL
321	KEY,WAY FAN DRIVE MOTOR
322	KIT EXH RCN COOLER

	Desciption
323	KIT,BRAKE CHAMBER RH/LH FRT
324	KIT,BRAKE HARDWARE
325	KIT,BRAKE PAD(INCL 18-19 21-26
326	KIT,CLAMP CONTROL BKT SLACK
327	KIT,CLAMP CTRL ARM BRACKET
328	KIT,FRT BRAKE-MAJOR"CAST PLUS"
329	KIT,KING PIN
330	KIT,KING PIN KNUCKLE
331	KIT,KINGPIN
332	KIT,RADIUS ROD REPAIR
333	KIT,ROLLER SERVICE
334	KIT,SLACK ADJUSTER LH FRONT
335	KIT,STEERING KNUCKLE REPAIR
336	KIT,STRIKER
337	KIT,TENSIONER BELT AUTOMATIC
338	KIT,UNIVERSAL JOINT DRIVE
339	KIT,WATER PUMP
340	KNUCKLE ASM,LH
341	KNUCKLE ASSY,STEERING LH
342	KNUCKLE ASSY,STEERING LH W/ARM
343	KNUCKLE ASSY,STEERING RH
344	KNUCKLE ASSY,STEERING RH W/ARM
345	KNUCKLE,STEERING ASSY STREET
346	KNUCKLE,STEERING CURBSIDE
347	KNUCLE ASM, LH
348	LINK ASSY,FRONT LEVELING VALVE
349	LINK ASSY,FRT LEVELING VALVE
350	LINK ASSY,LEVELING REAR C/S
351	LINK ASSY,LEVELING REAR R/S
352	LINK ASSY,REAR LEVELING VALVE
353	LINK,CENTER FRONT AXLE
354	LINK,DRAG ASSY
355	LOCK ASM,5/16"SQUARE KEY
356	LOCK,CURBSIDE W/C/L
357	LOCKNUT,HXHD 7/8-14 GR8
358	LOCKNUT,NYLON INSERT,LT8-32SST
359	LOCKNUT,SPANNER
360	MANDREL, GUIDE & PRESS
361	MANDREL, KING PIN PRESS IN
362	MANDREL, PRESSING
363	MANDREL, SHORT W/MAGNET
364	MANDREL,KING PIN CAP INSTALLAT
365	MANIFOLD,ASSY
366	MECHANISM ASSY, 32"WHLCHR RAMP
367	MOUNT ASSY, FORE
368	MOUNT ASSY,BOLT BAR REAR SHOCK

	Desciption
369	MOUNT ASSY,ENGINE REAR CURB
370	MOUNT ASSY,FAN
371	MOUNT ASSY,LH FORE/RH REAR
372	MOUNT ASSY,LH REAR/RH FORE
373	MOUNT ASSY,RADIUS ROD
374	MOUNT,CENTER BOND NEO
375	MOUNT,ENGINE FRONT
376	MOUNT,ENGINE REAR
377	MOUNT,RADIATOR
378	MOUNTING ASSY, STEERING DAMPER
379	MUFFLER ASM,SCR,24V NOX SENSOR
380	NIPPLE, 1" PT X 8 1/2" LG
381	NIPPLE,GREASE
382	NIPPLE,LUBRICATION HYDRAULIC
383	NUT ASSY,WHELL FRONT
384	NUT, CASTLE M12 X 1.5
385	NUT, HEX LOCK 1-14
386	NUT, HUB
387	NUT, LOCKING
388	NUT, SELF LOCKING
389	NUT,3/8-16" SELF-LOCK
390	NUT,ACORN
391	NUT,CAP
392	NUT,CAP W/S WIPER ARM (SHORT)
393	NUT,CLAMPING FRT AXLE
394	NUT,DOUBLE HEX W/COLLAR
395	NUT,FRT RAD ROD,DISC-LOCK ONLY
396	NUT,HEX JAM 1 1/4"- 12 UNF
397	NUT,HEX JAM 3/4-16 UNF REFRIG
398	NUT,HEX LOCKS M25 X 1.5
399	NUT,HEX M8-8 REAR SLACK ADJUST
400	NUT,HEX STEERING KNUCKLE
401	NUT,HEXAGON FLANGE
402	NUT,HEXAGON FLANGE M10X1.50
403	NUT,JAM 3/4 LH REFRIG COMPR
404	NUT,LOCK
405	NUT,LOCK M18
406	NUT,LOCK SPIDER AXLE
407	NUT,LOW CROWN 3/8'X24UNC
408	NUT,OUTER 1 3/4" 12UNC FRONT
409	NUT,PLANETARY GEAR DRIVE
410	NUT,PLANETARY GEAR DRIVE ASSY
411	NUT,PLATE COBOLT M8
412	NUT,RADIUS ROD LOCK M2.4 X 1.5
413	NUT,SLEEVE #10-32 UNF
414	NUT,SLEEVE PH 1/4"-20 UNC SST

	Desciption
415	NUT,SLOTTED 1.250"-12,STEERING
416	NUT,SLOTTED INNER
417	NUT,SLOTTED M100 X 1.5
418	NUT,SLOTTED OUTER
419	NUT,STOVER M20 X 2.5
420	NUT,TURBO MOUNTING
421	NUT,WHEEL BEARING INNER FRONT
422	NUT,WHEEL CAPPED ALUMINUM FRT
423	NUT,WHEEL CAPPED ALUMINUM REAR
424	NUT,WHEEL REAR
425	OERATOR PNEUMATIC MOTOR FRT DR
426	OUTER,SPACER ASSEMBLY INCI 7X8
427	OUTRIGGER, W/RAD MTG REAR
428	PAN,OIL
429	PANEL ASM, REAR CUP SD UPR LH
430	PANEL ASSY,CIRCUIT BOARD
431	PANEL ASSY,EX DR MULTI CONT G3
432	PANEL ASSY,RH SIDE UPPER REAR
433	PANEL LOWER RH CENTER
434	PANEL, ACCESS DOOR
435	PANEL, LOWER CURBSIDE REAR
436	PANEL, LOWER RH FRONT
437	PANEL, LOWER STREETSIDE FRONT
438	PANEL,ASM
439	PANEL,FIXED W/FUEL DOOR CUTOUT
440	PANEL,FRANGIBLE EMERGENCY
441	PANEL,INTERIOR LH REAR
442	PANEL,INTERIOR SIDEWALLS
443	PANEL,LH DRIVER'S
444	PANEL,LOWER LH CENTER
445	PANEL,LOWER LH REAR
446	PANEL,LOWER RH CENTER 3900
447	PANEL,LOWER RH REAR 3900
448	PANEL,MODESTY EXIT
449	PANEL,REAR RH WH
450	PANEL,RELAY CONTROL
451	PANEL,SIDE CONSOLE FRAME
452	PANEL,SKIRT
453	PANEL,SKIRT 77.78"
454	PANEL,SKIRT 82.15"
455	PANEL,SKIRT CS#6 FILTER ACCESS
456	PANEL,SKIRT FIXED CURBSIDE
457	PANEL,SKIRT FIXED STREETSIDE
458	PANEL,SKIRT REAR WHEELWEEL ST
459	PANEL,SKIRT SS#7 RADIATOR ACC-
460	PIGTAIL, MANIFOLD AIR TEMP GM

	Desciption
461	PILLAR,AL RR LH
462	PILLAR,AL RR RH
463	PILLAR,CORNER LOWER CURBSIDE
464	PILLAR,CORNER LOWER STREESIDE
465	PILLAR,LEFT SIDE
466	PILLAR,REAR LOWER,LEFT W/4HOLE
467	PILLAR,RIGHT SIDE
468	PILLER,REAR LOWER,RH W/4 HOLES
469	PIN, CONNECTING LMG
470	PIN, DOWEL
471	PIN,BRAKE SHOE ANCHOR FRT
472	PIN,BRAKE SHOE ANCHOR REAR
473	PIN,CLEVIS
474	PIN,REAR BRAKE SHOE ANCHOR
475	PIN,SLACK ADJUSTER
476	PIN,SPRING 3/8' X 1 1/2" ZINC
477	PIN,TREADLE
478	PIVOT ASSY, AFT
479	PIVOT ASSY, LOWER
480	PIVOT RAMP ASSY, RH
481	PIVOT,DOOR ENTRANCE/EXIT ASSY
482	PIVOT,PLATE
483	PLATE GUARD LEFT UPPER
484	PLATE GUARD LOWER LF/RT UPPER
485	PLATE, DASH MOUNTING
486	PLATE, DETENT # 1
487	PLATE, DETENT #2
488	PLATE, NUT REAR BUMPER MTG
489	PLATE,COVER
490	PLATE,COVER BATTERY TRAY
491	PLATE,DOVETAIL EXTERIOR MIRROR
492	PLATE,LOCK MOUNTING
493	PLATE,LOCK PLANETARY FINAL
494	PLATE,SHIM W/C/L
495	PLUG ASSY,THREADED W/SEAL
496	PLUG, THREADED
497	PLUG,DIFF DRAIN &FILL MAGNETIC
498	PLUG,DIFF DRAIN &FILLM24X1.5
499	PLUG,DRAIN & FILL
500	PLUG,LUBE MAG M24X1.5 METIC
501	PLUG,MAGNETIC
502	PLUG,MAGNETIC-AXLE DRAIN REAR
503	PLUG,PLANETARY FINAL DRIVE
504	PLUG,THREADED
505	PLUG,THREADED CUMMINS BE63
506	PLUG,THREADED ENGINE OIL PAN

	Desciption
507	PLUG,TRANSMISSION OIL PAN
508	PLUNGER, PRS REQULATOR
509	PLUNGER,PRS REGULATOR
510	POST, EXTERIOR #2 RH
511	POWER STRG PUMP ASSY, W/FITTIN
512	PRESSING ADAPTER
513	PRESSING, ADAPTER
514	PROPORTIONAL VALVE ASSY,HP
515	PULLEY ASSY,ENGINE
516	PULLEY, ACCESSORY DRIVE
517	PULLEY, FAN
518	PULLEY,ALTERNATOR CUMMINS ENG.
519	PUMP ASSY, RAMP
520	PUMP ASSY,BOOSTER
521	PUMP ASSY,FAN DRIVE
522	PUMP ASSY,RAMP W/C/L
523	PUMP ASSY,WATER N/F
524	PUMP, WINDSHIELD WASHER
525	PUMP,LUB. OIL
526	PUMP,POWER STEERING ASSY
527	PUMP,WASHER BOTTLE 12V
528	PUSH BUTTON ASSY
529	PUSH BUTTON,ENGINE START
530	RACK,BIKE ASSY DL2 S/S W/KIT
531	RADIUS ROD ASSY - UPPER
532	RADIUS ROD, LOWER REAR
533	RADIUS ROD, UPPER REAR
534	RADIUS ROD,ASSY LOWER
535	RADIUS ROD,FRONT
536	RAIL TOP, SEAT MOUNTING RH
537	RAMP ASSY,32"
538	RAMP CONTROL BOX ASSEMBLY
539	RAMP,HINGE WHEELCHAIR SR-1895
540	RAMP,LATCH HINGE ASSY
541	RAMP,MECHANISM ASSY W/C/L
542	RAMP,WELDMENT
543	RECTIFER,DEFROSTER/HEATER
544	REGULATOR ASSY,VOLTAGE 24V
545	REGULATOR, VOLTAGE
546	REGULATOR,AIR PRESSURE 23PSI
547	REGULATOR,AIR TANK
548	REGULATOR,V 50VR REMY,24V
549	ROD ASSY,END MALE W/FITTING
550	ROD ASSY,RADIUS LOWER REAR
551	ROD ASSY,RADIUS REAR LWR.
552	ROD END,3/4" MALE RH REFRIG

	Desciption
553	ROD, RADIATOR BRACE
554	ROD,FRONT RADIUS
555	ROD,RADIUS UPPER REAR
556	ROD,RADUIS UPPER REAR
557	ROD,REAR LEVELING VALVE
558	ROD,THREAD FAN PUMP
559	ROD,TORQUE LOWER FRONT
560	ROD,TORQUE LOWER REAR
561	ROD,TORQUE UPPER FRONT
562	ROD,TORQUE UPPER REAR
563	ROLLER,1 3/4" DIA BATTERY TRAY
564	ROLLER,BRAKE SHOE
565	ROLLER,GUIDE CLEVIS W/C/L
566	ROLLER,TENSION
567	ROLLPIN,BRAKE TREADLE E-8P
568	ROTOR, BRAKE CENTER
569	ROTOR,BRAKE FRONT 17"
570	ROTOR,BRAKE REAR 17"
571	SAFETY WALK, REAR CLAMP BAR BL
572	SCREW ASSY,PLANETARY DRIVE
573	SCREW, BUTTON HEX HD
574	SCREW, FLAT HEAD
575	SCREW, HEX FLANGE HEAD CAP
576	SCREW, HEX SST 1/4 - 20 UNC
577	SCREW, HEXAGON FLANGE HEAD CAP
578	SCREW, LOCK M12 X1.5X 85MM LG
579	SCREW, LOCK M16 X 1.5 X 40 LG
580	SCREW, SDR ISOLATOR CAP
581	SCREW, SST 5/8" X 1" LG
582	SCREW, TORX CAP M22 X 1.5 X 75
583	SCREW,CAP HEX SOC 3/8-16,1/2L
584	SCREW,CAP M18X60MM
585	SCREW,CAP/FRONT BRAKE
586	SCREW,CAP/REAR WHEEL HUB
587	SCREW,CAPTIVE WASHER CAP
588	SCREW,CYLIND INTER. M22X1.5X90
589	SCREW,ENTRANCE DOOR
590	SCREW,EXHAUST MANIFOLD
591	SCREW,EXT TORX HD M16X1.5X100
592	SCREW,FH CROSS RECESS
593	SCREW,FH CROSS RECESS SS 1/4"-
594	SCREW,FH CROSS RECESS SST #10-
595	SCREW,FH CROSS RECESS SST 1/4"
596	SCREW,FH THREAD CUT #10-32X1"L
597	SCREW,HEX CAP SOCKET M10 X 16
598	SCREW,HEX FLANGE C/S PULLEY
599	SCREW,HEX FLANGE HAD CUP
600	SCREW,HEX FLANGE HEAD CAP
601	SCREW,HEX FLANGE SCREW
602	SCREW,HEX HD MACH8-32,7/8"LSST
603	SCREW,HEX HEAD CAP 3/4"-10LG.
604	SCREW,HEX LOCK M10 X 18
605	SCREW,HEX SOCK 1/4-20 5/8L
606	SCREW,NUT CLAMPING FRT AXLE
607	SCREW,OIL LEVEL PLANETARY
608	SCREW,PH CROSS RECESS
609	SCREW,SELF ALIGNING FRONT DRUM
610	SCREW,SET# 10-32 UNF X 1/8" LG
611	SCREW,SOCKET HEAD 3/8"X1 1/4"
612	SCREW,SOCKET HEADCAP/FUEL PUMP
613	SCREW,SPECIAL PLANETARY
614	SCREW,SPEICAL PLANETARY GEAR
615	SCREW,STANCHION 1/4"-20X.87 SS
616	SCREW,STARTER 12 POINT CAP
617	SCREW,STEERLING KNUCKLE
618	SCREW,STOP 5/8"FIND SQUAREHEAD
619	SENDER,FUEL LEVEL
620	SENDER,FUEL LVL W/GA W/LOW LVI
621	SENSOR, NITROGEN OXIDE (AFTER
622	SENSOR, NITROGEN OXIDE (BEFORE
623	SHAFT ASSY,DRIVE
624	SHAFT ASSY,LH REAR AXLE
625	SHAFT ASSY,RH REAR AXLE
626	SHAFT ASSY,W/ARM ENT/EXIT #4
627	SHAFT, REAR AXLE
628	SHAFT,DRIVE ASSY
629	SHAFT,REAR AXLE
630	SHEAVE,5V-2 GROOVE FAN DRIVE
631	SHIELD,DUST
632	SHIELD,GLARE CURB LAMP
633	SHIELD,SPLASH
634	SHIM,0.10 MM
635	SHIM,0.20 MM
636	SHIM,0.5 MM
637	SHIM,0.50MM
638	SHIM,1.00 MM
639	SHIM,1.50 MM
640	SHIM,1.5MM
641	SHIM,2.5MM
642	SHIM,2MM
643	SHIM,LF RAMP MECHANISM
644	SHOCK, FRT ABSORBER ASSY 2-8

	Desciption
645	SLACK ADJUSTER,FRONT LH
646	SLACK ADJUSTER,FRONT RH
647	SLACK ADJUSTER,REAR R/S,C/S
648	SLEEVE, CENTERING
649	SLEEVE, INSTALLER
650	SLEEVE, PRESS-IN
651	SLEEVE,NEEDLE
652	SLIDE, 240MM - SET
653	SNAP RING
654	SNAP,RING
655	SPACER
656	SPACER ASM,OUTER
657	SPACER TUBE
658	SPACER, 0.281 I.D. X 1.25 OD
659	SPACER, WHEELCHAIR RAMP
660	SPACER,EXHAUST MANIFOLD MOUNTI
661	SPACER,MOUNT
662	SPACER,RADUIS ROD MOUNTING R
663	SPACER,ROD END TURNBUCKLE REFR
664	SPIDER ASM, FRONT BRAKE LH
665	SPIDER ASM,FRONT BRAKE RH
666	SPIDER ASSY,BRAKE FRONT
667	SPIDER ASSY,BRAKE FRONT LH
668	SPIDER ASSY,BRAKE FRONT RH
669	SPIDER ASSY,BRAKE REAR
670	SPIDER ASSY,PLANETARY DRIVE
671	SPIDER ASSY,REAR BRAKE
672	SPINDLE ASSY,AXLE HOUSING
673	SPRING ASM GAS
674	SPRING ASM,GAS
675	SPRING, COMPRESSION
676	SPRING,AIR FRONT
677	SPRING,AIR REAR
678	SPRING,FRONT AIR
679	SPRING,PRESSURE
680	SPRING,REAR AIR
681	SPRING,RETURN
682	SPRING,RETURN BRAKE SHOE
683	SPRING,TENSION
684	SPROCKET ASSY,CURBSIDE
685	SPROCKET, SST 1/2P(#40) 9T 1/2
686	STANCHION, EXIT SS
687	STAND OFF
688	STARTER ASM,DELCO 39MT,24V
689	STARTER,DELCO 42MT 24V
690	STARTER,DELCO 42MT 24VOLT
691	STARTER,DELCO 42MT CLOCKED 24V
692	STRAP ASSY,FUEL TANK
693	STRAP,ASSY
694	STRAP,BEARING
695	STRAP,LOCK
696	STRAP,PULL UP W/C RAMP
697	STRUT ASSY, MDT MOUNTING
698	STRUT,ENGINE CRADLE LH/SS
699	STRUT,REAR AXLE
700	STUD
701	STUD,AIR COMPRESSOR
702	STUD,FUEL INJECTION PUMP
703	STUD,REAR/WHEEL HUB
704	STUD,RH THREAD
705	STUD,RH TREAD/FRONT WHEEL HUB
706	STUD,TURBO MOUNTING
707	STUD,TURBOCHARGER
708	STUD,TURBORCHARGER
709	STUD,WHEEL 7/8-14
710	STUD,WHEEL FRONT HUB
711	STUD,WHEEL MOUNTING M22X1.5X65
712	STUD,WHEEL REAR
713	SUPPORT AIR SPRING RH
714	SUPPORT,CHANNEL
715	SUPPORT,FUEL PUMP
716	SUPPORT,FUEL PUMP MOUNTING
717	SUPPORT,MOTOR
718	SUPPORT,REAR
719	SUSPENSION BEAM ASSY, LH
720	SUSPENSION BEAM ASSY,RH
721	SUSPENSION,BUMPER
722	TANK,MUFFLER AIR DRYER
723	TEE,1 5/16" X #16 JICX#12 JIC
724	TEE,STREET 1/4"PT
725	TENSIONER,BELT
726	TENSIONER,BELT ALTERNATOR ASSY
727	TENSIONER,BELT GROOVED INSIDE
728	TENSIONER,BELT SMOOTH
729	TENSIONER,WATER PUMP
730	T-HANDLE
731	TIE ROD ASM, W/ENDS
732	TORQUE,ADAPTER,TX100
733	Total number of items in category
734	TUBE ASSEMBLY,DISCHARGE-16
735	TUBE ASSY
736	TUBE ASSY SUPPLY

	Desciption
737	TUBE ASSY,BYPASS
738	TUBE ASSY,OIL COOLER FILLER
739	TUBE PRESSURE SENSING
740	TUBE, DRAIN SPOUT
741	TUBE, FUEL DRAIN
742	TUBE, OIL LEVEL GAUGE
743	TUBE,CAC INLET ENGINE
744	TUBE,CAC REAR
745	TUBE,COMPRESSOR WATER INLET
746	TUBE,COPPER 3/4 "OD"
747	TUBE,COPPER 3/4" O.D.
748	TUBE,CPR WATER INLET
749	TUBE,CPR WATER OUTLET
750	TUBE,CROSS ASSY FRONT AXLE
751	TUBE,CROSS ASSY REAR AXLE
752	TUBE,EXHAUST
753	TUBE,EXHAUST COOLER WATER OUTL
754	TUBE,FILLER TRANSMISSION
755	TUBE,FORMED MULTIPLE
756	TUBE,FRONT BRAKE CHAMBER
757	TUBE,FUEL DRAIN
758	TUBE,FUEL SUPPLY
759	TUBE,INJECTOR FUEL
760	TUBE,INJECTOR FUEL #1 CYLINDER
761	TUBE,INJECTOR FUEL #2 CYLINDER
762	TUBE,INJECTOR FUEL SUPPLY FROM
763	TUBE,LAB OIL DRAIN
764	TUBE,OIL FILLER
765	TUBE,OIL GAUGE
766	TUBE,POWER STEER'G REAR SUPPLY
767	TUBE,PRESSURE SENSING
768	TUBE,SUPPLY
769	TUBE,TURBO OIL SUPPLY
770	TUBE,WATER TRANSFER
771	TURNBUCKLE, TENSIONING
772	TURNBUCKLE,TENSIONING
773	TURNBUCKLE,TENSIONING REFRIGER
774	U-BOLT,LONG AXLE
775	VALVE ASM,BRAKE TREADLE E-8P
776	VALVE ASM,FAN & P/S CONTROL
777	VALVE ASSY COMPLETE, E6 BRAKE
778	VALVE ASSY RELEASE
779	VALVE ASSY, RELAY R-14
780	VALVE ASSY, SOLENOID 12V
781	VALVE ASSY,BRAKE E-10
782	VALVE ASSY,BRAKE RELAY

	Desciption
783	VALVE ASSY,CHECK FL 1/4 PIPE
784	VALVE ASSY,DISCHARGE SERVICE
785	VALVE ASSY,DOUBLE CHECK
786	VALVE ASSY,EMER BRK RELEASE
787	VALVE,AIR COCK EMERG RELEASE
788	VALVE,AIR SUPPLY
789	VALVE,BRAKE RELAY
790	VALVE,EXH GAS RCN
791	VALVE,FREON 24V SUTRAK A/C
792	VALVE,LEVELING FRONT
793	VALVE,MAG DOOR OPERATOR
794	VALVE,PARKING BRAKE CONTROL
795	VALVE,PRESSURE RELIEF
796	VALVE,PUMP RELIEF
797	VALVE,PURGE ASSY KIT AIR DRYER
798	VALVE,QUICK RELEASE QRN-2
799	VALVE,RELAY R-12 DC 5.5 PSI
800	VALVE,RELIEF ASSEMBLY
801	VALVE,RETARDER CONTROL
802	VALVE,ROTARY DUMP
803	VALVE,SAFETY
804	VALVE,SAFETY 200 PSI
805	VALVE,SCR SYSTEM 24V
806	VALVE,SHUT OFF,1/4"MPT
807	VALVE,SINGLE CHECK
808	VALVE,SOLENOID ENT DOOR
809	VALVE,SOLENOID LINE
810	VALVE,SPRING BRAKE CONT
811	VALVE,SR-7 SPRING BRK CONTROL
812	VALVE,SYNCHRO AIR DRYER
813	VALVE,WATER FILTER-HOSE
814	VALVE-DUMP,ENTR DOOR
815	WASHER
816	WASHER FLAT 3/8"
817	WASHER, FLAT 1/4" SST
818	WASHER, SEALING-20
819	WASHER, THRUST
820	WASHER,188"ID.375OD036-.065THK
821	WASHER,ANCHOR PIN
822	WASHER,FLAT
823	WASHER,FLAT .03" THICK BRAKE
824	WASHER,FLAT .12" THICK BRAKE
825	WASHER,FLAT FRONT WHEEL HUB
826	WASHER,FRONT BEARING
827	WASHER,FRONT OUTER AXLE
828	WASHER,LOCK

	Desciption
829	WASHER,LOCK/FRONT WHEEL HUB
830	WASHER,LOCKING KIT
831	WASHER,OIL LEVEL PLANETARY
832	WASHER,RADIUS ROD
833	WASHER,REAR SLACK ADJUSTER
834	WASHER,S-CAM
835	WASHER,SEAL FUEL PUMP TRANSFER
836	WASHER,SEALING
837	WASHER,SEALING OIL PAN PLUG
838	WASHER,SNUBBING
839	WASHER,SPACE
840	WASHER,SPACER
841	WASHER,SPECIAL FRONT BRAKE

	Desciption
842	WASHER,SPECIAL REAR BRAKE
843	WASHER,THRUST
844	WASHER,THRUST FRT AXLE
845	WASHER,THRUST PLANETARY FINAL
846	WATER PUMP (1500)
847	WHEEL HUB, REAR
848	YOKE ASSY, 14 MM
849	YOKE ASSY,DIFFERENTIAL CARRIER
850	YOKE ASSY,REAR AXLE
851	YOKE ASSY,TRANS B400 HALF 4100
852	YOKE ASSY,TRANSMISSION
853	YOKE,CLEVIS BRK CHAMBER FRT
854	YOKE,TRANSMISSION