

K8264

Mawila

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

K826430150

FACILITY: RG & GR Harris Funeral Home		SRN / ID: K8264
LOCATION: 15451 Farmington, LIVONIA		DISTRICT: Detroit
CITY: LIVONIA		COUNTY: WAYNE
CONTACT:		ACTIVITY DATE: 07/09/2015
STAFF: Stephen Weis	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Compliance inspection of R.G. and G.R. Harris Funeral Home. This facility is scheduled for inspection in FY 2015.		
RESOLVED COMPLAINTS:		

Location:

RG & GR Harris Funeral Homes and Cremation Services (SRN K8264)
15451 Farmington Road
Livonia

Date of Activity:

Thursday, July 9, 2015

Personnel Present:

Steve Weis, DEQ-AQD Detroit Office
Susan Harrison, Family Service Director, Livonia location
David Cash, Manager and Funeral Director, Livonia location

Purpose of Activity

An inspection of the RG & GR Harris Funeral Home (hereinafter "Harris") location in Livonia was conducted on Thursday, July 9, 2015. Harris was on my list of sources targeted for an inspection during FY 2015. The purpose of this inspection was to determine compliance of operations at the Harris facility with applicable rules, regulations and standards as promulgated by Public Act 451 of 1994 (NREPA, Part 55 Air Pollution Control) and Federal standards. The facility was also issued Wayne County Permit C-1894, which was approved on February 26, 1971.

Facility Description

The Harris facility in Livonia is located on the west side of Farmington Rd., just north of 5 Mile Road. It is located at the southwest corner of Farmington Road and Roycroft Street. Harris backs up to a residential neighborhood, which is located directly to the west. The area around Harris primarily consists of residential properties and neighborhoods, as well as various commercial properties located along the frontages of Farmington and 5 Mile Roads.

Harris' Livonia location is one of three locations owned and operated by RG & GR Harris Funeral Homes; there are also locations in Detroit (15251 Harper Ave.) and Garden City (31551 Ford Rd.). According to Harris' website, the company was established in 1910 in Detroit, and the Livonia location began operating in 1964. The Harris Livonia location is a funeral home, providing funeral services. While the official name of the facility includes "Cremation Services", cremation does not occur at this location; cremations are contracted with a separate company that is located in Canton Township.

Facility Operations

The Harris location in Livonia is a funeral home. As mentioned in the previous section, there are no cremation services provided at this location, and thus no cremation activities. This facility used to operate a cremation incinerator on-site. The previously-referenced Wayne County permit, No. C-1894, was issued for the installation and operation of a Universal Incinerator Corporation incinerator unit equipped with a Barber burner with over-fire air, rated at 200,000 BTU per hour. There is microfilmed information in the AQD-Detroit Office files for this equipment, which provides specifics regarding the location of the incinerator, and the size and dimensions of the chimney – it was to have a 15 inch by 15 inch opening, and extend to a height of 25 feet above grade. During the

inspection/walk-through portion of the site visit, I was told by Mr. Cash that when he first began working at Harris' Livonia location 23 years ago, the incinerator was still being used at that time, but it permanently ceased operating about one year later.

The only other potential sources of ambient air emissions at the Harris facility are the heating and cooling system, and the emergency back-up generator. The building is heated and cooled via a rooftop unit. This unit is a typical commercial building sized unit, as is exempt from air quality permitting requirements per the provisions of Michigan Administrative Rule 282(b)(i).

The generator is located near the northwest corner of the building. The generator is a Bryant Standby Generator, Model No. ASPDA1BBL025, rated at 25kW and fired with natural gas. The generator is used for emergency purposes, providing back-up electricity to the funeral home during utility grid power outages to allow the lights to work inside the building. According to Bryant's website, the ASP Model units are residential standby generators, and they self-start during power outages. The generator also starts once a week for a 12 minute run-test to keep the unit lubricated. This was also mentioned by David during the inspection, when he told me that the generator runs once a week on an auto cycle. David also told me that the heating and cooling contractor that installed the generator, Flame, checks the generator and performs maintenance on it once a year.

Inspection Narrative

I arrived at Harris' Livonia location at 2:30pm. I stopped at the welcome desk, where I met Susan Harrison, Family Service Director of the Livonia location. I introduced myself, and stated the purpose of my visit. Susan and I discussed the background of the facility, and talked about the incinerator and the generator. Susan told me that the incinerator has not operated for a long time. I had some questions regarding the generator in order to help determine the potential applicability of Federal standards to the operation of the unit. Specifically, I asked when the engine was ordered by Harris, when it was installed at the site, and if Harris had any information from the manufacturer relating the EPA emissions certification. Susan looked through the company files to see if she could find the information. She found the invoice for the purchase of the generator, which was dated March 23, 2009. She called Flame to check if they had any information relating to the date that the generator was ordered, and if they had any information relating to the emissions certification. They did not have this information on hand, but said that they would try to find the information for Susan.

It was at this time that David Cash arrived. Susan introduced us, and I asked him some questions regarding the facility. I asked him about the building's heating and cooling system, and whether the building used any boilers. He replied that there are no boilers in use, and that the building's climate control is via a rooftop unit. David and I then went to the basement to look at the incinerator. The incinerator is located within the wall along a hallway.

The main access/charge door to the incinerator is still present, as well as other access points. According to the microfilmed drawing in the permit file, the primary door in the middle, about halfway between the floor and the ceiling is the fire door, the door closest to the floor was used to remove ash, and the round ports close to the ceiling are a damper and a burner port. David told me that the incinerator was still being used when he first started working at the Livonia location 23 years ago, and that it permanently ceased operating about a year later. According to David, some remodeling work was done on the main floor to add the file room and the break room, which involved working on the wall directly above the incinerator through which the incinerator flue ran to the chimney. David opened the fire door, and I could see that the incinerator was filled with pieces of brick and construction debris. A picture of the open fire door is attached to this report. I asked David if the gas supply to the incinerator had been permanently removed, and he replied that it had.

We proceeded upstairs, and went outside to look at the generator. David stated that the generator is used to provide emergency electrical power during outages to ensure that the lights in Harris' building stay on. We opened the access door to the unit, and I obtained some information from the various manufacturer plates and stickers affixed to the unit. I was able to identify the generator as a Bryant Standby generator, Model No. ASPDA1BBL025, with a serial number of 2007V23699, and an output rating of 25kW. A picture of the manufacturer sticker is attached to this report.

After we concluded our walk-through of the facility, I told David that I would need to gather some additional information regarding the generator in order to determine the potential applicability of Federal standards to the operation of the unit. I left the facility at 3:40pm.

Permits/Orders/Regulations

As previously referenced, Wayne County Installation Permit C-1894 was issued to Harris on February 26,

1971. This permit addressed the installation and operation of the incinerator. Based on the information gathered during the July 9, 2015 inspection, the incinerator was permanently taken out of service over 20 years ago, and has been rendered inoperable. As such, Permit No. C-1894 will be voided.

The installation and operation of the generator needs to be analyzed for the potential applicability of Federal emission standards. The first Federal regulation that was checked in terms of potential applicability is the **Federal NESHAP (National Emission Standard for Hazardous Air Pollutants) for Stationary Reciprocating Internal Combustion Engines (or RICE), 40 CFR Part 63, Subpart ZZZZ**. This Subpart applies to owners and operators of so-called stationary RICE located at a major or area sources of hazardous air pollutant (HAP) emissions. Harris is not a major source of HAP emissions, so it would be classified as an area source. The applicability criteria put forth in paragraph 63.6585 states that, since the generator at Harris is used as an emergency generator, and meets the definitions and criteria for an emergency engine as put forth in paragraphs 63.6585(f)(1) through (3) and 63.6640(f), the generator is not subject to Subpart ZZZZ. In addition, paragraph 63.6590(c) provides that stationary RICE that are subject to an applicable regulation under 40 CFR Part 60 meet the requirements of Subpart ZZZZ by meeting the requirements of the applicable Part 60 regulation. Paragraph (c) goes on to say that "...No further requirements apply for such engines under this part."

Accordingly, the other Federal regulation that was checked for potential applicability is the **Federal New Source Performance Standard (NSPS) for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ**. This regulation applies to certain manufacturers, owners and operators of engines that meet certain criteria. These criteria relate to the dates that the engines were manufactured, and when they were ordered. On July 14, 2015, I called Bryant to get some information relating to the engine at the Harris facility. The person that I spoke with, Mike, referred me to the engine manufacturer, Generac. I spoke with Alexis at Generac, who told me that Generac sells engines to Bryant that are installed in Bryant generators, and she referred me back to Bryant to obtain the information. On July 15, 2015, I called Bryant again, speaking with Maisha. I gave her the background of my request. She asked me for the engine's serial number. I provided it to her, and she explained that the first two numbers refer to the week of the year that the engine was manufactured, and the next two numbers correspond to the year. Thus, the engine at Harris was manufactured on the 20th week in 2007. Maisha was also able to find out that the generator was officially ordered from Bryant on March 31, 2009.

I compared the dates received from Bryant to the applicability criteria in paragraph 60.4230. Paragraph 60.4230 (a)(4) states that Subpart JJJJ is applicable to engine owners and operators that order their engines after June 12, 2006, which Harris did. Paragraph (a)(4) goes on to specify manufacture dates for the engines that further determine applicability. Paragraph (a)(4)(iii) puts forth that an engine with a maximum engine power less than 500hp that was manufactured on or after July 1, 2008 is subject to Part JJJJ, while paragraph (a)(4)(iv) states that emergency engines with a maximum engine power greater than 25hp is subject to Subpart JJJJ if it was manufactured on or after January 1, 2009. The engine in the generator at the Harris facility is rated at 30hp, and, as previously mentioned, it was manufactured in the 20th week of 2007. Thus, the manufacture date of the engine in the Bryant generator looks to waive the applicability requirement for Subpart JJJJ, with one exception; paragraph 40.4230(a)(6) states that:

"..the provisions of §60.4236 of this subpart are applicable to all owners and operators of stationary SI ICE that commence construction after June 12, 2006."

Recalling that the generator was ordered by Harris on March 31, 2009, and that, for the purposes of Subpart JJJJ, the date that construction commences is the date the engine is ordered by the owner or operator (60.4230 (a)), the generator is subject to the provisions of paragraph 60.4236. This paragraph addresses the importing and installing of stationary SI ICE produced in previous model years. The provisions and requirements of paragraph 60.4236 do not apply to the operation of the generator at the Harris facility. I have attached some information relating to the Bryant generator used at Harris.

Compliance Determination

Based upon the results of the July 9, 2015 site visit, the RG & GR Harris Funeral Homes and Cremation Services facility in Livonia appears to be in compliance with all applicable Federal and state regulations. Wayne County Installation Permit C-1894 will be voided due to the permanent shutdown of the permitted equipment.

Attachments to this report: information relating to the Bryant Standby Generator used at the facility; pictures of the generator and the former incinerator.

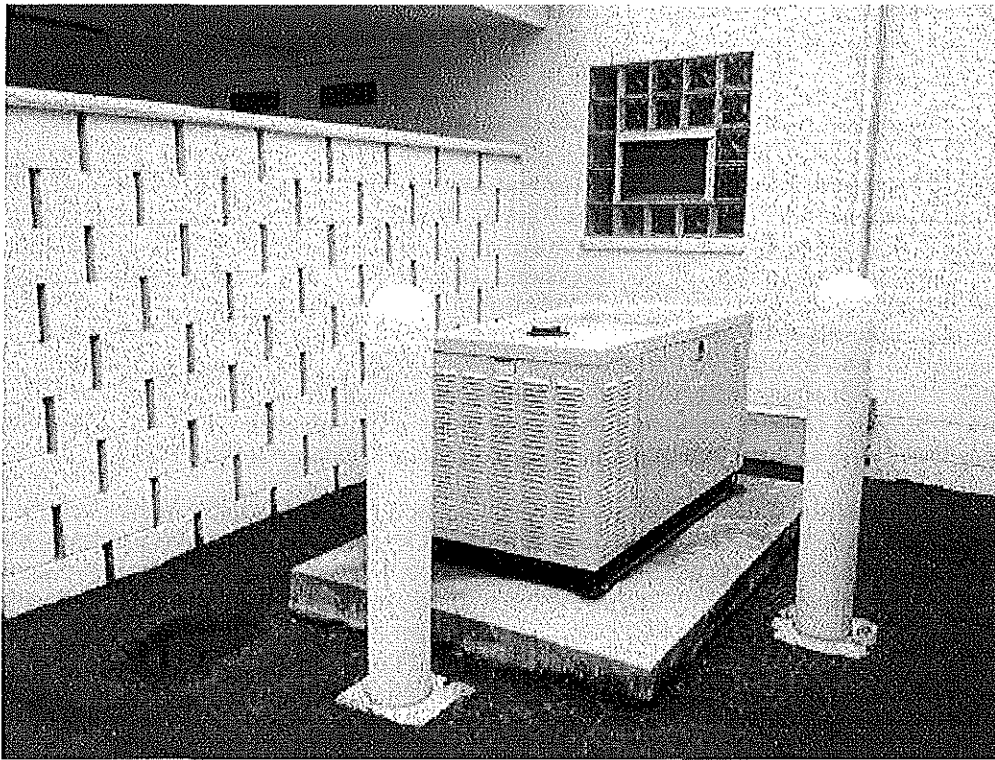


Image 1(Bryant Generator) : Bryant Standby Generator



Image 2(incinerator) : Picture of now-closed incinerator, showing remodeling debris that has filled the combustion chamber.

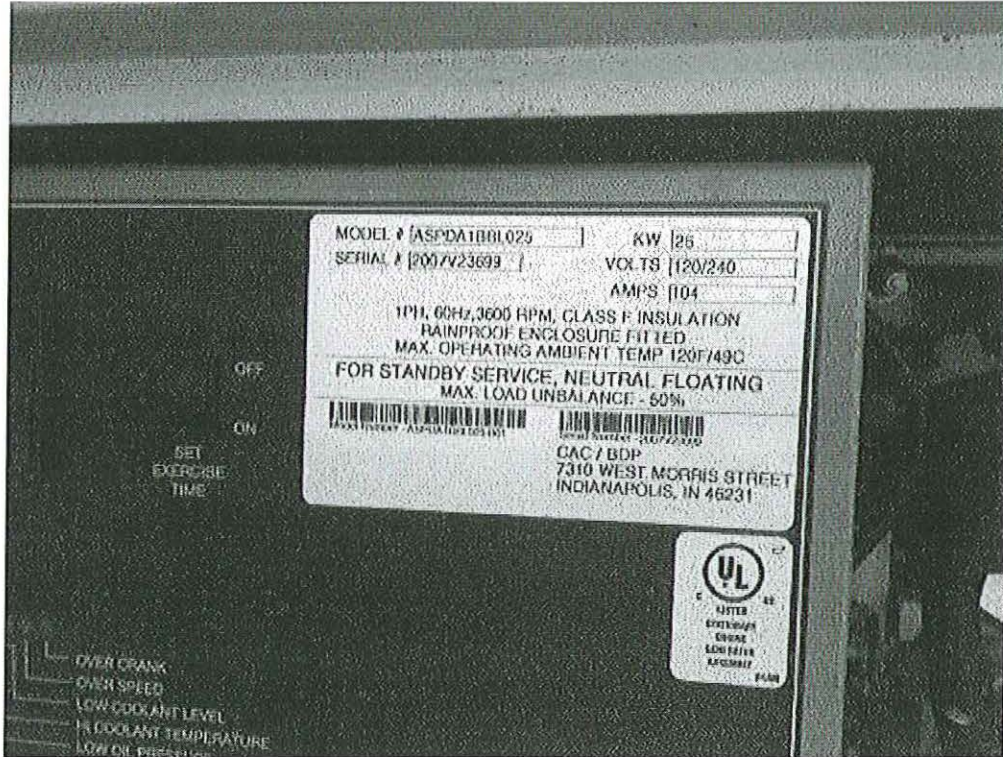


Image 3(generator info) : The manufacturer nameplate information on the Generac engine inside of the Bryant generator.

NAME Steve Web

DATE 9/1/15

SUPERVISOR JK