

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

M351164849

<b>FACILITY:</b> MACOMB COUNTY ANIMAL CONTROL		<b>SRN / ID:</b> M3511
<b>LOCATION:</b> 21417 DUNHAM, CLINTON TWP		<b>DISTRICT:</b> Warren
<b>CITY:</b> CLINTON TWP		<b>COUNTY:</b> MACOMB
<b>CONTACT:</b> Chief Randazzo , Chief Animal Control Officer		<b>ACTIVITY DATE:</b> 09/08/2022
<b>STAFF:</b> Robert Elmouchi	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Scheduled inspection.		
<b>RESOLVED COMPLAINTS:</b>		

On September 8, 2022, I conducted a scheduled on-site inspection of Macomb County Animal Control (SRN: M3511), located at 21417 Dunham Road, Clinton Township, Michigan 48036. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and the conditions of Permit to Install (PTI) No. 533-94A.

PTI No. 533-94A was approved on December 1, 2021. PTI 533-94 was modified to permit the incineration of confiscated drugs and pharmaceuticals. Per Chief Randazzo, Macomb County Animal Control (MCAC) has not incinerated drugs and pharmaceuticals. Per a follow-up telephone conversation on September 28, 2022, I emphasized that the PTI specifies additional recordkeeping requirements to track the incineration of drugs and pharmaceuticals. I also encouraged Chief Randazzo to contact my supervisor if he has any questions after I retire in January 2023. I followed up the telephone conversation with an email in which I provided my supervisor's contact information.

MCAC's division services include pet adoptions, lost and found pets, animal cruelty investigations, dog licensing, animal bite reports, and rescue services for domestic animals and injured or sick wildlife. MCAC has achieved an animal survival rate of approximately 90%, which has allowed the facility to dismantle two of the three previously permitted cremation units.

The remaining animal cremation unit operating under PTI No. 533-94A was manufactured by JAR Incinerator Service, Incorporated, located at 18614 Fort Street, Riverview, Michigan. Per the permit to install application received October 27, 1994, the following is a list of the emission unit specifications:

**Model:**

- J.A.R. M.C.P. 350 – Multiple Chamber controlled-air unit.

**Capacity:**

- 300 lb./hr. per PTI application (350 lb./hr., per manufacturer specifications) Type 4 Waste.

**Design:**

- Three (3) burners in the primary combustion chamber. Each primary burner is rated at a heat input of 800,000 Btu/hr. but are set to operate at approximately 600,000 Btu/hr. for a total of approximately 2.4 MMBtu/hr.
- One (1) burner in the secondary combustion chamber. The secondary burner is rated at a heat input of 1.2 MMBtu/hr. but is set to operate at approximately 1.0 MMBtu/hr.
- 9" thick hearth floor with water-tight stainless-steel pan inside the regular steel housing.
- Front charging door.
- Rear clean-out door.
- Automatic combustion air modulation for both primary and secondary combustion chambers.
- Thermocouple temperature sensors in both primary and secondary combustion chambers.
- Charge Rate: Not to exceed 300 lbs. per hour per permit application.
- Recordkeeping: Start time of cremation and charge weight per permit application charge rate.

**EMISSION LIMITS**

Special Condition (SC) I.1 limits PM emissions to 0.20 lbs. per 1000 lbs. of exhaust gases. The emission limit table monitoring/test method references SC V.1, which states in part, "Upon the request of the AQD District Supervisor, the permittee shall verify PM emission rates from EUCREMATORY1 by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules." I observed zero percent opacity visible emissions during a cremation, which appeared to indicate compliant operation with the R 336.1301 standards for density of emissions. Furthermore, there is no history of complaints against this source. Therefore, an emissions test has not been requested by the AQD.

**MATERIAL LIMITS**

A review of records indicated compliance with the SC II.2 charge limit of 300 pounds per charge. Because cause drugs and pharmaceuticals have not been incinerated the permittee is in compliance with SC II.3, which states in part, "The permittee shall burn a minimum of 90 percent pathological waste by weight as defined in SC II.1 of EUCREMATORY1 on a calendar quarterly basis..." As noted above, I emphasized the

**importance of keeping the permit-required records when the incineration of drugs and pharmaceuticals commences.**

### **PROCESS/OPERATIONAL RESTRICTIONS**

**Per the inspection conducted on August 18, 2020, Chief Randazzo had ordered a temperature chart recorder, and installation services, from Mechanical Services. Due to the COVID-19 pandemic, there was a lengthy delay in receiving the equipment and installation. As of this inspection, the circular temperature chart recorder was installed and operating.**

**It is important to note that the design of this temperature chart recorder is different from the secondary chamber temperature chart recorders I have observed at other facilities because it is capable of simultaneously recording three different temperatures, whereas other cremation units only record the temperature of the secondary combustion chamber control device. In this installation, two of the three chart pens were operational: one for the secondary combustion chamber (control device) and one for the primary combustion chamber (emission unit). I reviewed the temperature chart records in detail and suggested that MCAC stop recording the primary combustion chamber temperature because it is not required per the permit and because, even though different colored pens are used, parallel temperature records are confusing for both MCAC employees and the AQD to read.**

**A review of the circular temperature chart records indicates compliance with the SC III.1 requirement to maintain a minimum temperature of 1600°F in the secondary combustion chamber.**

**Chief Randazzo also provided me the opportunity to train him and three employees on the proper and safe operation of the cremation unit. All were receptive to the training and asked a lot of questions.**

### **MONITORING/RECORDKEEPING**

**A review of recordkeeping logs and temperature charts indicates that the minimum permitted recordkeeping requirements of temperature, description, weight, and duration of burn have been satisfied. Chief Randazzo, the employees, and I discussed how to improve recordkeeping to facilitate a compliance review by MCAC staff and the AQD. The changes include replacing the chart recorder paper each operating day and writing additional information on the chart paper to speed the cross-referencing of records between the handwritten logs and the temperature charts.**

**CONCLUSION**

**Per this inspection, Macomb County Animal Control (MCAC) appears to be in compliance with the conditions of PTI No. 533-94A.**

NAME *Robert Elmarchi*

DATE 9/26/2022

SUPERVISOR *Joyce*