



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
WARREN DISTRICT OFFICE



AARON B. KEATLEY  
ACTING DIRECTOR

June 28, 2023

VIA E-MAIL AND U.S. MAIL

Chief Randazzo  
Macomb County Animal Control  
21417 Dunham Road  
Clinton Township, MI 48036

SRN: M3511, Macomb County

Dear Chief Randazzo:

**VIOLATION NOTICE**

On June 1, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Macomb County Animal Control located at 21417 Dunham Road, Clinton Township, Michigan. The purpose of this inspection was to determine Macomb County Animal Control's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 533-94A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCREMATORY1 Process/Operational Restrictions	PTI No. 533-94A, Special Condition III.1 & Special Condition IV.1.	The permittee failed to maintain the minimum of 1600° F in the secondary combustion chamber temperature while combusting waste.
EUCREMATORY1 Process/Operational Restrictions	PTI No. 533-94A, Special Condition III.2.	The permittee failed to operate the incinerator in a satisfactory manner to control emissions from EUCREMATORY1. Charges are inserted into the incinerator while the unit is off.
EUCREMATORY1 Process/Operational Restrictions	PTI No. 533-94A, Special Condition III.3.	Permittee has not submitted a Malfunction Abatement Plan (MAP) within 45 days of permit issuance.

EUCREMATORY1 Monitoring/Recordkeeping	PTI No. 533-94A, Special Condition VI.4.	Permittee failed to keep satisfactory secondary combustion temperature records. Occasionally, time of burn (duration) recorded between handwritten log and circular temperature charts did not match, indicating the circular temperature chart papers were inserted incorrectly.
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Records provided during the inspection on June 1, 2023 indicate that Macomb County Animal Control combusted waste in EUCREMATORY1 without achieving or maintaining the minimum required temperature of 1600° F in the secondary combustion chamber. This constitutes a violation of PTI No. 533-94A, EUCREMATORY1, III.1, which states, "The permittee shall not combust waste in EUCREMATORY1 unless a minimum temperature of 1600°F and a minimum retention time of 0.95 seconds in the secondary combustion chamber are maintained." This also constitutes a violation of PTI No. 533-94A, EUCREMATORY1, IV.1, which states, "The permittee shall not operate EUCREMATORY1 unless the secondary combustion chamber with afterburner is installed, maintained, and operated in a manner satisfactory to the AQD District Supervisor."

Records provided during the inspection on June 1, 2023 indicate that Macomb County Animal Control charged waste into the incinerator while the unit was off. This constitutes a violation of PTI No. 533-94A, EUCREMATORY1, III.2, which states, "The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EUCREMATORY1. A list of recommended operating and maintenance procedures is specified in Appendix A." Appendix A number 3, states "Preheat the unit with the burners (not with waste) for at least 15 minutes."

A review of the AQD files for Macomb County Animal Control indicate that the permittee never submitted a Malfunction Abatement Plan (MAP). This constitutes a violation of PTI No. 533-94A, EUCREMATORY1, III.3, which states, "The permittee shall not operate EUCREMATORY1 unless a Malfunction Abatement Plan (MAP) as described in Rule 911(2), for cremation of non-pathological waste, has been submitted within 45 days of permit issuance, and is implemented and maintained."

The time of burn (duration) that was recorded in the handwritten logs provided during inspection on June 1, 2023, did not match the duration recorded in the circular temperature charts for the same period. There are also periods on the chart from August 29, 2022 where the temperature reading went off the chart and recorded two different sets of recordings for the same time and day. This indicates that the circular

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temperature chart papers were not loaded properly. This constitutes a violation of PTI No. 533-94A, EUCREMATORY1, SC VI.4, which states, "The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, secondary combustion chamber temperature records for EUCREMATORY1, as required by SC VI.2."

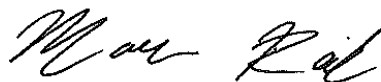
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 19, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Macomb County Animal Control believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Macomb County Animal Control. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,



Marie Reid  
Environmental Quality Analyst  
Air Quality Division  
586-249-6505 | [ReidM5@michigan.gov](mailto:ReidM5@michigan.gov)

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Joyce Zhu, EGLE