



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

April 13, 2017

Mr. John Topolie
Meadowcrest Memorial Cemetery
5800 East Davison
Detroit, MI 48212

SRN: M4185, Wayne County

Dear Mr. Topolie:

VIOLATION NOTICE

On June 28, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Meadowcrest Memorial Cemetery and Crematorium Association located at 5800 East Davison, Detroit, Michigan. The purpose of this inspection was to determine Meadowcrest Memorial Cemetery and Crematorium'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 Wayne County Installation Permit (WC) numbers C-10085 and C-8703.

During the inspection, staff observed the followings while reviewing operational records from April 19, 2016 through July 18, 2016:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|------------------------------------|--|
| Crematorium Unit A | WC-8703, Special Condition (SC) 16 | Discharged visible emissions logged as "smoking" in excess of the "no visible emission" limit on 39 occasions. |
| Crematorium Unit A | WC-8703, SC 20 | Exceeded the weight charge rate limit of 200 pounds per hour on June 18, 2016 (at 212 pounds per hour). |
| Crematorium Unit# 5 | WC-10085, SC 23 | Exceeded the weight charge rate limit of 100 pounds per hour on 74 occasions (high of 180 pounds per hour on June 20, 2016). |

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Wayne County Installation Permit No. (WC) C-8703 was issued for Crematorium Unit A with a Letter of Conditions (LOC) dated January 12, 1990. Special Condition (SC) 16 of the LOC states that "There shall be no visible emissions from the crematory stack."

Operational records were received from Meadowcrest Memorial Cemetery and Crematorium Association following the onsite inspection on June 28, 2016. A review of the records spanning the dates from April 19, 2016 through July 18, 2016 identified 39 instances where the cremation process was noted as "smoking". Each of these instances represents a violation of SC 16 of WC C-8703. Please see the attached file for a listing of these events.

The SC 20 of WC C-8703 states that "The crematorium rate shall not exceed 200 pounds per hour". On June 18, 2016, the facility records indicated a charge weight of 293 pounds was cremated beginning at 5:55 PM and ending at 7:18 PM, thus representing a period lasting 83 minutes or 1.383 hours. The calculated cremation rate for this operation is 212 pounds per hour, which represents a violation of SC 20 of WC C-8703.

The WC C-10085 was issued for Crematorium Unit #5 with a LOC dated April 15, 1993. SC 23 states that the "Process weight rate for the furnace shall not exceed 100 pounds per hour nor 146 tons per year." A review of the facility's records from April 19, 2016 through July 18, 2016 identified 76 instances where the process weight rate exceeded 100 pounds per hour. Please see the attachment for a listing of these events. The highest process weight rate appeared to have occurred on June 20, 2016, when the facility records show a charge weight rate of 189 pounds was cremated beginning at 2:57 PM and ending at 4:00 PM, thus representing a period lasting 63 minutes or 1.05 hours. The calculated process weight rate for this operation is 180 pounds per hour. Each of the 74 instances listed in the attachment represents a violation of SC 23 of WC C-10085.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 4, 2017 (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.

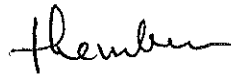
If Meadowcrest Memorial Cemetery and Crematorium Association believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Meadowcrest Memorial

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Cemetery and Crematorium Association. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Terseer Hemben
Environmental Engineer
Air Quality Division
313-456-4677

Enclosure

cc: Ms. LaReina Wheeler, City of Detroit BSEED
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ