



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

October 30, 2018

CERTIFIED MAIL – 7017 3380 0000 4105 8957

Mr. Bill Hudson
Tri-County Cremation Services
1106 E. Michigan Ave
Ypsilanti, Michigan 48198

SRN: N1374, Washtenaw County

Dear Mr. Hudson:

VIOLATION NOTICE

On October 25, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Tri-County Cremation Services (Company) located at 1106 E. Michigan Avenue, Ypsilanti Michigan. The purpose of this inspection was to determine the Company'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) and the associated Air Pollution Control Rules, Permit to Install (PTI) 609-95A. It was also to investigate a complaint about black smoke coming from a crematory stack on September 20, 2018.

During the inspection/complaint investigation, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
200 pounds/hour capacity natural gas fired crematory EU-CREMATORY3 "West Unit"	¹ PTI 609-95A General Condition #11.	Opacity well in excess of 20% for a six-minute average occurred on September 20, 2018, based on a complaint received and discussions with crematorium operator. Opacity excursions are likely occurring on a regular basis during cremations.
200 pounds/hour capacity natural gas fired crematory EU-CREMATORY3 "West Unit"	¹ PTI 609-95A EU-CREMATORY3 Condition IV.2 DESIGN/EQUIPMENT PARAMETERS.	Opacity monitor has not been calibrated and is recording erroneous results. There is also no alarm set for 10% opacity as required by the PTI. This is a repeat violation from an inspection conducted on 4/20/2017

200 pounds/hour capacity natural gas fired crematory EU-CREMATORY3 "West Unit"	¹ PTI 609-95A EU-CREMATORY3 Condition III.1 PROCESS/ OPERATIONAL RESTRICTIONS.	Records shows temperature in the afterburner dropping below 1600 degrees F on numerous occasions during cremations. This is a repeat violation from an inspection conducted on 4/20/2017.
200 pounds/hour capacity natural gas fired crematory EU-CREMATORY3 "West Unit"	¹ PTI 609-95A EU-CREMATORY3 Condition VI.5 MONITORING /RECORDKEEPING.	Quarterly maintenance inspections of all equipment associated with EU-CREMATORY3 are not being done. This is a repeat violation from an inspection conducted on 4/20/2017.

¹ Note: These special conditions in PTI 609-95A are enforceable under Paragraph 9.A.4. of Consent Order AQD No 3-2011.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 20, 2018. 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 violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

In addition, verification of opacity readings from the crematorium is being requested. Please provide 30 days of daily opacity monitor chart readings within 60 days of the date of this letter that verifies that EU-CREMATORY3 is complying with the 20% opacity limitation in the PTI. Please also provide proof that the opacity monitor has been properly calibrated and is in working order prior to recording the 30 days of opacity data.

Please submit written response to the DEQ, AQD Jackson District, at 301 East Louis B Glick Highway Jackson, Michigan 49201 and submit copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Company 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 this Company. 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,



Mike Kovalchick
Environmental Engineer
Air Quality Division
517-416-5025

cc: Mr. Scott Miller, DEQ

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ

Mr. Craig Fitzner, DEQ

Mr. Chris Ethridge, DEQ

Ms. Jenine Camilleri, DEQ