

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

N215326500

FACILITY: Sleepy Hollow Pet Cemetery LLC		SRN / ID: N2153
LOCATION: 2755 64th Street SW, BYRON CENTER		DISTRICT: Grand Rapids
CITY: BYRON CENTER		COUNTY: KENT
CONTACT: Duane DeJong		ACTIVITY DATE: 08/18/2014
STAFF: Denise Plafcan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT:		
RESOLVED COMPLAINTS:		

Denise Plafcan (DP) conducted an unannounced scheduled inspection to determine compliance with state and federal Air Quality rules, regulations PTI 253-01, 116-04 and 149-13. The company was included in the 2014 Compliance Inspection list because of the issuance of PTI 149-13. DP confirmed the week before the inspection that the new incinerator was up and operating. DP drove around the area prior to entering the property and the facility. There were no odors, fugitive emissions or opacity noted from the facility, heat waves from the stack were observed from the roadway and confirmed ongoing operation of the unit. DP met with, Duane DeJong and explained the purpose of the inspection and reviewed the Environmental Inspection Brochure. Duane introduced Joel Fields and Dean DeJong. DP reviewed the requirements of PTI Nos. 253-01, 116-04 and 149-13 and also provided a copy of PTI 253-01 and 116-04. Since the equipment covered in PTI 116-04 has been decommissioned and replaced with the new incinerator, Duane agreed to send a PTI Void request for PTI 116-04 to remove the permit from both the Grand Rapids District Office and Lansing files. Dean was the escort on the physical inspection of the plant. The first incinerator is the smallest unit and was permitted in 2001 under PTI 253-01. The permit does not have a complete description of the unit but the PTI application does contain detailed information.

SPECIAL CONDITIONS

Emission Unit Identification EUINCINERATOR

Emission Limits Particulate 0.20 pounds per 1,000 pounds of exhaust gases, corrected to 50% excess air an instantaneous timeframe. Testing was not requested as part of this compliance inspection

Material Usage Limits

1.2 The permittee shall not burn any waste in EUINCINERATOR other than the following wastes:

Pathological wastes - As defined in the federal Standards of Performance for New Stationary Sources, 40 CFR 60.51c, pathological waste means waste materials consisting of only human or animal remains, anatomical parts, and/or tissue; the bags/containers used to collect and transport the waste material; and animal bedding. Dean opened the door to the incinerator and it appeared that only small

animals were in the front of the load near the door. No other waste items were being stored near the incinerator.

Process/Operational Limits

1.3 The permittee shall not charge or combust waste in EUINCINERATOR unless a minimum temperature of 1600 °F and a minimum retention time of 1.0 seconds in the secondary combustion chamber are maintained. During the inspection the incinerator was operating at 1180°F and the afterburner was operating at 1651° F.

1.4 The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EUINCINERATOR. A list of recommended operating and maintenance procedures is specified in Appendix A. Appendix A was posted near the incinerator and it appeared the unit is being well maintained and following the guidelines of Appendix A. The last calibration date was April 14,2014.

1.5 The permittee shall not store pathological waste on site for more than 24 hours unless the waste is contained in cold storage (45°F or less). Compliance with this condition was not evaluated as part of this compliance inspection but animals are stored under refrigeration.

Monitoring

1.6 The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the temperature in the secondary combustion chamber of EUINCINERATOR on a continuous basis. No continuous monitor was installed on the unit and no hand written log was on the unit to record the intermittent temperatures. The company was informed that the failure to have a continuous temperature monitoring device will be included in a Violation Notice(VN).

Recordkeeping/Reporting/Notification

1.7 The permittee shall keep, in a satisfactory manner, daily records of the description and weight of waste combusted in EUINCINERATOR. All records are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request. Records are being maintained and are essential in determining the most efficient burn. Occasionally weights reported are double checked with the scale on site. AQ staff did not confirm that 5 years' worth of records were being maintained.

1.8 The permittee shall keep, in a satisfactory manner, secondary combustion chamber temperature records for EUINCINERATOR. All records are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request. Temperature records are not being maintained and will be included in the VN.

Stack/Vent Restrictions

**Maximum Diameter 18 (inches) Minimum Height Above Ground Level 24 (feet).
Stack vent Dimensions were not verified during this compliance inspection**

APPENDIX A

Incinerator Operation and Maintenance Guidelines are being followed.

The new unit is state-of-the-art and has additional monitoring conducted remotely by the manufacturer located in Florida. The manufacturer also keeps track of all operating parameters electronically. DP explained that it is important to keep all the records for 5 years. Since the unit was installed in July they are still waiting for a complete training program on the electronic data portion of the system. The new unit also has an opacity monitor that is linked into the electronic data collection system. There are motion detection cameras on the stacks and as security at the facility. The operation of the incinerator can be evaluated by the employees remotely by any web device or smart phone.

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

DESCRIPTION EUINCINERATOR3:

MCD Company IEB-40

Fuel Type: Natural gas

Maximum Charge: 2,500 Pounds

Burn Rate: 350 Pounds/Hour

Charge Type: Animal remains

POLLUTION CONTROL EQUIPMENT: Secondary chamber with afterburner

I. EMISSION LIMITS EUINCINERATOR3.

PM 0.20 lb /1,000 lbs of gas based on the Test Protocol Calculated to 50% excess air and Test Protocol shall specify averaging time. Testing was not requested as part of this compliance inspection.

II. MATERIAL LIMITS

1. The permittee shall not burn any waste in EUINCINERATOR3 other than the following

Pathological wastes—As defined in the federal Standards of Performance for New Stationary Sources, 40 CFR 60.51c, pathological waste means waste materials consisting of only human or animal remains, anatomical parts, and/or tissue; the bags/containers used to collect and transport the waste material; and animal bedding. This permit applies to animal pathological waste and associated materials. It appears Sleepy Hollow is only burning allowed waste materials.

2. The permittee shall not charge more than 2,500 pounds per charge in EUINCINERATOR3 it is not cost effective for Sleepy Hollow to attempt to burn waste exceeding the design capacity of the incinerator.

3. The permittee shall not burn any fuel in EUINCINERATOR3 other than natural gas. Only natural gas is used as fuel for the incinerator and secondary combustion chamber.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not combust waste in EUINCINERATOR3 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 seconds in the secondary combustion chamber are maintained. During the inspection the incinerator was operating at 994°F and the afterburner was operating at 1356°F. The company was informed that a VN will be issued for operating the incinerator before the afterburner was at a minimum of 1600 °F

2. The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EUINCINERATOR3. A list of recommended operating and maintenance procedures is specified in Appendix A. Appendix A was posted near the incinerator and it appeared the unit is being well maintained and following the guidelines of Appendix A.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall install, calibrate maintain and operate in a satisfactory manner a device to monitor and record the temperature in the secondary combustion chamber of EUINCINERATOR3 on a continuous basis. The unit has a circular chart and also continuous electronic monitoring.

2. The permittee shall maintain a scale at the facility for the purpose of verifying the charge weight if needed for SC II.2 There is a scale on site and it is used to verify the weights that are reported when the animal is submitted for cremation. Since the cost is based on the weight and the efficiency of the burn it is advantageous to have accurate calculations. The burn parameters are based on the weight that is entered into the electronic system.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years.

All monitoring and record keeping is being performed as required including continuous monitoring on a circular chart (see attached). All monitoring and required recordkeeping are being stored on an electronic database with the manufacturer. Employees are still being trained in the use of the electronic data retrieval system.

VIII. STACK/VENT RESTRICTIONS

SVINCINERATOR3 Maximum Diameter 20 (inches) Minimum Height Above Ground Level 22 (feet). Stack vent Dimensions were not verified during this compliance inspection.

APPENDIX A

Incinerator Operation and Maintenance Guidelines are being followed except for number 3 that requires the secondary combustion chamber (afterburner) is at or

above the minimum required temperature. This temperature must be maintained for the duration of the burn cycle. This is being included in the VN.

Before leaving the facility, DP also spoke with David Fields, the owner, on speaker phone. During this conversation DP summarized the violations and concerns about no continuous monitoring method. David Fields expressed frustration over the potential cost and that no one had pointed this out during the past 13 years. He also mentioned that Mary Charley, the permit engineer, said they were all set when the PTI was issued in 2001. DP then showed the on-site staff the condition that required the continuous monitor. DP also explained about the temperature issue of the new incinerator that the afterburner must be at 1600°F before the actual incinerator is turned on and the animals are placed inside. David Fields said he would be discussing the matter with his attorney and also confirmed that Ms. Blue was still the correct AQD Supervisor. Mr. Fields wanted a complete copy of his file and DP explained that they could do a FOIA and agreed to provide Joel the information he would need to submit a FOIA request. When DP returned to the GR District Office and conducted a review of PTI 253-01 files there was testing documentation for the unit that contained a circular chart verifying the temperature during the test. This chart, in the PTI application file, certainly gives the appearance that the unit was equipped with a circular chart at some point in time.

Based on the physical inspection and the records and documents provided the facility appears to be in non-compliance with state and federal Air Quality rules and regulations and PTI Nos. 253-01 and 149-13. A VN will be issued for the items identified in this report.

NAME 

DATE 8.22.14

SUPERVISOR 