

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

N376859294

<b>FACILITY:</b> PERRY MOUNT PARK CEMETERY		<b>SRN / ID:</b> N3768
<b>LOCATION:</b> 878 N PERRY ST, PONTIAC		<b>DISTRICT:</b> Warren
<b>CITY:</b> PONTIAC		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b> Danny Losee , President		<b>ACTIVITY DATE:</b> 07/16/2021
<b>STAFF:</b> Shamim Ahammod	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Conducted an onsite scheduled inspection of Perry Mount Park Cemetery.		
<b>RESOLVED COMPLAINTS:</b>		

On July 16, 2021, Michigan Department of Environment, Great Lakes and Energy (EGLE) -Air Quality Division (AQD) staff, I (Shamim Ahammod) conducted an onsite scheduled inspection of Perry Mount Park Cemetery (SRN: N3768) located at 878 N Perry St., Pontiac, Michigan. The purpose of the 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); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) Nos. 249-93 and 59-07.

### Permit History

On June 2, 1993, PTI No. 249-93 was issued to Perry Mount Park Cemetery for the installation and operation of J.A.R. incinerator, Model A-50 (EUCREMATORY1) to burn 200 pounds per hour of combined 0 (trash) and 4 wastes (human and animal).

On March 20, 2007, PTI No. 59-07 was issued to Perry Mount Park Cemetery to operate the US Cremation Model Classic Human Crematory Natural Gas Fired (EUCREMATORY2).

### Source Description

The facility provides human cremation services. The facility is currently operating EUCREMATORY1 and EUCREMATORY2.

### Onsite Inspection

On July 16, 2021, at 2:00 PM, I arrived at the facility and was greeted by Mr. Losee, President of Perry Mount Park Cemetery. I introduced myself, provided credentials, and stated the purpose of the inspection. Mr. Losee and I toured the facility. At the time of inspection, EUCREMATORY1 and EUCREMATORY2 were not operating.

Emission units were not labeled properly. I advised Mr. Losee to label the emission units.

### REGULATORY ANALYSIS

#### PTI No. 249-93 (J.A.R. incinerator, Model A-50, EUCREMATORY1)

This permit does not contain any monitoring or recordkeeping requirements.

Although this emission unit is permitted to incinerate Type 0 (trash) and Type 4 (human and animal remain) wastes, Perry Mount only incinerates human remains and does not incinerate any animal remains or trash, according to Mr. Losee. During my inspection, this incinerator was not in operation. According to Mr. Losee, the incinerator has an interlock that prevents primary combustion chamber ignition until the secondary combustion chamber reaches 1550 degrees Fahrenheit. This appears to demonstrate compliance with special condition no. 18 and 19, which requires the secondary combustion chamber to operate at a minimum of 1400 F.

Perry Mount appears to comply with special condition no. 20, which addresses the disposal of collected ash, because the remains are collected after each cremation and the remains are delivered to the family, according to Mr. Losee.

Mr. Losee stated that the operating instructions were kept in the main office building and that he would move them to the incinerator building to maintain compliance with permit special condition no. 22.

### **PTI No. 59-07**

#### **(US Cremation Model Classic Human Crematory, EUCREMATORY2)**

The following conditions apply to EUCREMATORY2

Emission unit: EUCREMATORY2

#### **Emission Limits**

Pollutant	Limit	Time Period / Operating Scenario	Equipment
1. PM	0.20 lb/1000 lbs of gas <sup>a</sup>	Hourly	EUCREMATORY2

Per General Conditions (GC) 13, The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. AQD hasn't requested the facility for the PM emission test yet.

Per GC 11, The grading of visible emissions shall be determined in accordance with R 336.1303.  
**(R 336.1301)**

- a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
- b) A visible emission limit specified by an applicable federal new source performance standard.
- c) A visible emission limit specified as a condition of this permit to install.

At the time of inspection, EUCREMATORY2 was not in operation. Therefore, I did not observe the opacity from the stack.

#### **Material Limits**

Per SC 1.2, based on their records, it appears the permittee does not burn any waste in EUCREMATORY2 other than pathological wastes.

Per SC 1.6, The permittee shall keep, in a satisfactory manner, daily records of the time, description, and weight of waste combusted in EUCREMATORY2, as required by SC 1.2. The permittee maintains the daily records of the description and weight of the waste combusted in EUCREMATORY. However, they don't maintain the daily records of the time of waste combusted in EUCREMATORY2. I recommended Mr. Losee keeping the daily records of the time they combust the waste.

#### **Process/Operational Restrictions**

Per SC 1.3, the permittee shall not combust waste in EUCREMATORY2 unless a minimum. the temperature of 1600°F and a minimum retention time of 1.0 seconds in the secondary combustion chamber is maintained. During my inspection, EUCREMATORY2 was not in operation. Per SC 1.5, the permittee shall install, calibrate, maintain and operate satisfactorily a device to monitor and record the temperature in the secondary combustion chamber of EUCREMATORY2 continuously. During my inspection, I observed the permittee did not keep the daily continuous secondary combustion temperature records in the cremation temperature log chart. They are planning to fix the temperature recording device (chart recorder) soon. This is a violation of SC 1.3, 1.5, and 1.7 of permit No. 59-07. AQD will issue a violation letter to the facility. However, their digital

temperature monitor was functioning. Mr. Losee said they maintain a minimum temperature of 1600°F in the secondary combustion and they observe it in digital temperature monitor.

SC 1.4, the incinerator shall be installed, maintained, and operated satisfactorily to control emissions from EUCREMATORY2. A list of recommended operating and maintenance procedures is specified in Appendix A. Mr. Losee is the designated operator for both cremation units. Grates are cleaned after each use. Mr. Losee confirmed that the secondary combustion chamber is always preheated before the primary chamber is charged, and Mr. Losee stated that there are interlocks that prevent the operation of the primary chamber unless the secondary chamber is operating at, or above, 1600 F. I recommended Mr. Losee to have a copy of the manufacturer's manual and maintenance guideline to be posted near the incinerators. The permittee did not have any inspection to check and service all of the equipment in the last few years. This is the violation of SC 1.4 of PTI No. 59-07.

### Stack/Vent Restrictions

Per SC 1.8, at the time of inspection, the exhaust stacks appeared vertical and unobstructed. SVCREMATORY2 stack appeared to be at least 18 feet above ground in height.

### Conclusion

Based on the on-site inspection, it appears Perry Mount Park Cemetery complies with the requirements of PTI No. 249-93 and PTI No. 59-07 except SC 1.3, 1.4, 1.5, and 1.7 of PTI No. 59-07. AQD will issue a violation letter to the facility for the violation of SC 1.3, 1.4, 1.5, and 1.7 of PTI No. 59-07.

NAME 

DATE 8/13/21

SUPERVISOR 