



STATE OF MICHIGAN
 DEPARTMENT OF ENVIRONMENTAL QUALITY
 SOUTHEAST MICHIGAN DISTRICT OFFICE.



RICK SNYDER
 GOVERNOR

DAN WYANT
 DIRECTOR

July 15, 2015

Mr. Jason Santeiu, President
 SM Services/Faithful Companion Memorials, Inc.
 4900 Fernlee Avenue
 Royal Oak, Michigan 48073-1017

SRN: N5753, Oakland County

Dear Mr. Santeiu:

VIOLATION NOTICE

On July 07, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of SM Services/Faithful Companion Memorials, Inc. (SMS/FCM) located at 4900 Fernlee Avenue, Royal Oak, Michigan. The purpose of this inspection was to determine SMS/FCM'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 administrative rules; and the conditions of Permit to Install (PTI) number 310-05C.

During the July 07, 2015, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-Crematory2 (Communal Animal)	PTI No. 310-05C, SC EU-Crematory2, III.1: minimum T = 1600 °F, minimum retention time $\tau = 1.0$ seconds	SM Services/Faithful Companion Memorials, Inc. (SMS/FCM) failed to maintain minimum required temperature; AQD staff observed this incinerator operating at 1536 °F
EU-Crematory4 (Human Right)	PTI No. 310-05C, SC EU-Crematory4, III.1: minimum T = 1600 °F, minimum retention time $\tau = 1.0$ seconds	SMS/FCM failed to maintain minimum required temperature; AQD staff observed this incinerator operating at 1439 °F
EU-Crematory2 (Communal Animal)	Rule 336.1910 (Air cleaning devices); PTI No. 310-05C, Appendix A	SMS/FCM failed to maintain minimum required temperature, keep combustion adjusted properly.
EU-Crematory4 (Human Right)	Rule 336.1910 (Air cleaning devices); PTI No. 310-05C, Appendix A	SMS/FCM failed to maintain minimum required temperature, keep combustion adjusted properly.
Each crematory (EU-Crematory Incinerator Nos. 1 thru 6) is required to be operated if and only if secondary combustion chamber is maintained at minimum temperature of 1600 °F. In addition, combustion must be properly adjusted.		

On July 07, 2015, the AQD staff observed operation of EU-Crematory2 (Communal Animal) and EU-Crematory4 (Human Right) while not maintaining secondary combustion temperature at or above 1600 °F. This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **August 5, 2015** (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.

The written response to this Violation Notice (VN) must include the following:

1. The fuel and air adjustments are done manually by an operator and hence combustion adjustment depends upon operator skills. Hence, frequent visible emissions (VE) and lower temperatures are observed. SMS/FCM must include a plan to install electronic (computer) combustion control systems such that fuel, air, oxygen are electronically adjusted properly, reliably and consistently in order to maintain always minimum temperature of 1600 °F at secondary combustion chamber. Neighborhood perceptions are not good if visible emissions are observed from a crematorium.
2. SMS/FCM must include a plan to convert paper temperature charts to an electronic data acquisition system. Upon acquiring such temperature data, SMS/FCM must produce temperature data summaries acceptable to AQD using MS Excel or such equivalent or better software.
3. SMS/FCM is frequently operating incinerators at less than 1600 °F (secondary combustion chamber). SMS/FCM must include a plan to install audible and visible alarms when temperatures fall below 1600 °F.

If SM Services/Faithful Companion Memorials, Inc. 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 SMS/FCM. 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,



Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division
konanahalli@michigan.gov or 586-753-3741

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ