



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 31, 2022

VIA E-MAIL AND U.S. MAIL

Thomas E. Rood
Director of Market Development/General Manager
Faithful Companion Memorials, Inc.
4900 Fernlee Avenue
Royal Oak, MI 48073-1017

SRN: N5753, Oakland County

Dear Thomas E. Rood:

VIOLATION NOTICE

On August 2, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Faithful Companion Memorials, Inc. located at 4900 Fernlee Avenue, Royal Oak, Michigan. The purpose of this inspection was to determine Faithful Companion Memorials' 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; the conditions of Permit to Install (PTI) number 310-05D; and to investigate an AQD staff's observation on July 30, 2022, regarding black smoke attributed to Faithful Companion Memorials' operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-CREMATORY1	PTI No. 310-05D, EU-CREMATORY1, III.2, and R 336.1910.	On July 30, 2022, the permittee failed to maintain, operate, and control emissions from EU-CREMATORY1 in a satisfactory manner.
EU-CREMATORY1	PTI No. 310-05D, EU-CREMATORY1, IV.1, and R 336.1910.	On July 30, 2022, the permittee operated EU-CREMATORY1 while the secondary combustion chamber with an afterburner was not maintained and operated in a satisfactory manner.
EU-CREMATORY5	PTI No. 310-05D, FG-IEB16 IV.1, and R 336.1910.	On August 2, 2022, the permittee operated EU-CREMATORY5, which is in FG-IEB16, while the secondary combustion chamber

		with an afterburner was not maintained and operated in a satisfactory manner.
EU-CREMATORY7	PTI No. 310-05D, FG-IEB16, III.1, III.2, and R 336.1910.	On June 1, 2022, the permittee combusted waste in EU-CREMATORY7, which is in FG-IEB16, while the secondary combustion chamber temperature was at 1500°F. This was 100°F less than the permit required minimum of 1600°F.
EU-CREMATORY7	PTI No. 310-05D, FG-IEB16, III.1, III.2, and R 336.1910.	On July 2, 2022, the permittee combusted waste in EU-CREMATORY7, which is in FG-IEB16, while the secondary combustion chamber temperature was at 1525°F. This was 75°F less than the permit required minimum of 1600°F.
EU-CREMATORY8	PTI No. 310-05D, FG-IEB16, III.1, and R 336.1910.	On July 2, 2022, the permittee combusted waste in EU-CREMATORY8, which is in FG-IEB16, while the secondary combustion chamber temperature was at 1550°F. This was 50°F less than the permit required minimum of 1600°F.
EU-CREMATORY8	PTI No. 310-05D, FG-IEB16, IV.1, and R 336.1910.	On August 2, 2022, the permittee operated EU-CREMATORY8, which is in FG-IEB16, while the secondary combustion chamber afterburner was not maintained and operated in a satisfactory manner.
PTI No. 310-05D	EU-CREMATORY1, VI.1, EU-CREMATORY2, VI.1, and FG-IEB16, VI.1.	The permittee failed to complete all required records in a format acceptable to the AQD District Supervisor.

Per AQD staff observations of black smoke on July 30, 2022, the permittee failed to maintain, operate, and control emissions from EU-CREMATORY1 in a satisfactory manner. This constitutes a violation of PTI No. 310-05D, EU-CREMATORY1, III.2, which states in part, *“The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EU-CREMAOTRY1.”* This also constitutes a violation of R 336.1910, which states, *“An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.”* Furthermore, the permittee failed to maintain, operate, and control emissions from EU-CREMATORY1 in a satisfactory manner. This constitutes a violation of PTI No. 310-05D, EU-CREMATORY1, IV.1, which states, *“The permittee shall not operate any crematory in EU-CREMATORY1 unless the secondary combustion chamber with afterburner is installed, maintained, and operated in a satisfactory manner.”* This also constitutes a violation of R 336.1910, which states, *“An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.”*

Per AQD staff observations of black smoke on August 2, 2022, the permittee failed to maintain, operate, and control emissions in a satisfactory manner from EU-CREMATORY5, which is in FG-IEB16. This constitutes a violation of PTI No. 310-05D, FG-IEB16, IV.1, which states, *“The permittee shall not operate any crematory in FG-IEB16 unless its respective secondary combustion chamber with afterburner is installed, maintained, and operated in a satisfactory manner.”* This also constitutes a violation of R 336.1910, which states, *“An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.”*

Per records received on August 2, 2022, on June 1, 2022, the permittee combusted waste in EU-CREMATORY7, which is in FG-IEB16, while the secondary combustion chamber temperature was at 1500°F. This was 100°F less than the permit required minimum of 1600°F. This constitutes a violation of PTI No. 310-05D, FG-IEB16, III.1, which states, *“The permittee shall not combust waste in any unit in FG-IEB16 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 seconds in the respective secondary combustion chamber are maintained.”* This also constitutes a violation of FG-IEB16, III.2, which states in part, *“The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EU-CREMATORY7.”* And this constitutes a violation of R 336.1910, which states, *“An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.”*

Per records received on August 2, 2022, on July 2, 2022, the permittee combusted waste in EU-CREMATORY7, which is in FG-IEB16, while the secondary combustion chamber temperature was at 1525°F. This was 75°F less than the permit required minimum of 1600°F. This constitutes a violation of PTI No. 310-05D, FG-IEB16, III.1, which states, *“The permittee shall not combust waste in any unit in FG-IEB16 unless a*

minimum temperature of 1600°F and a minimum retention time of 1.0 seconds in the respective secondary combustion chamber are maintained.” This also constitutes a violation of FG-IEB16, III.2, which states in part, “The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EU-CREMATORY7.” And this constitutes a violation of R 336.1910, which states, “An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.”

Per records received on August 2, 2022, on July 2, 2022, the permittee combusted waste in EU-CREMATORY8, which is in FG-IEB16, while the secondary combustion chamber temperature was at 1550°F. This was 50°F less than the permit required minimum of 1600°F. This constitutes a violation of PTI No. 310-05D, FG-IEB16, III.1, which states, “*The permittee shall not combust waste in any unit in FG-IEB16 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 seconds in the respective secondary combustion chamber are maintained.*” This also constitutes a violation of R 336.1910, which states, “An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.” Furthermore, the permittee failed to maintain, operate, and control emissions in a satisfactory manner from EU-CREMATORY8. This constitutes a violation of PTI No. 310-05D, FG-IEB16, IV.1, which states, “The permittee shall not operate any crematory in FG-IEB16 unless its respective secondary combustion chamber with afterburner is installed, maintained, and operated in a satisfactory manner.” This also constitutes a violation of R 336.1910, which states, “An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.”

Per a review of records received on August 2, 2022, the permittee failed to complete all required records in a format acceptable to the AQD District Supervisor because cremation logs contained false handwritten temperature records compared to the continuous temperature chart records (e.g., every handwritten record indicates 1650°F whereas temperature chart records indicate different values, some of which were as low as 1500°F), time records do not indicate a.m. or p.m. or switch from 12-hour to 24-hour time, plus some of the time records on the logs and temperature charts are unreadable or incomplete. This constitutes a violation of PTI No. 310-05D, EU-CREMATORY1, VI.1, EU-CREMATORY2, VI.1, and FG-IEB16, VI.1, which states, “*The permittee shall complete all required records in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.*”

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 21, 2022 (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

Thomas E. Rood
Faithful Companion Memorials, Inc.
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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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092-2793, and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Faithful Companion Memorials 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 Faithful Companion Memorials. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,



Robert Elmouchi
Senior Environmental Quality Analyst
Air Quality Division
586-854-3244; elmouchir@michigan.gov

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE