



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 10, 2020

Ms. Sue Sullivan, Manager
Lincoln Memorial Park Crematorium
21661 East 14 Mile Road
Clinton Township, MI 48035

SRN: N7496, Macomb County

Dear Ms. Sullivan:

VIOLATION NOTICE

On October 29, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Lincoln Memorial Park Crematorium located at 21661 East 14 Mile Road, Clinton Township, Michigan. The purpose of this inspection was to determine Lincoln Memorial Park Crematorium'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) numbers 281-05 and 251-07.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Crematory Furnace "M1" used to combust human remains.	PTI No. 281-05 Special Condition 1.3 and 1.4 R336.1910	Facility operated furnace M1 while the secondary combustion chamber temperature was below 1600°F.

On October 29, 2020, the AQD staff observed operation of a crematory furnace while the secondary combustion chamber was below 1600°F. AQD staff observed that the cremation process was started with the secondary combustion chamber temperature above 1600°F (up to 1650°F). During the first few minutes of combustion, the temperature began to drop, eventually reaching as low as 1440°F. The furnace operator was able to quickly restore the secondary combustion chamber temperature to 1600°F by controlling the burners manually.

This constitutes a violation of Permit to Install No. 281-05, Special Conditions 1.3, which states, in part, that the permittee shall not combust waste in the crematory furnace unless a minimum temperature of 1600°F is maintained in the secondary combustion chamber. The secondary combustion chamber must be kept above 1600°F at all times that waste is being combusted in the primary combustion chamber.

Ms. Sue Sullivan
Lincoln Memorial Park Crematorium
Page 2
December 10, 2020

This also constitutes a violation of Special Condition 1.4 and Rule 910 of the administrative rules promulgated under Act 451, which require 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 violation and submit a written response to this Violation Notice by December 31, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is 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.

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

If Lincoln Memorial Crematorium 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 violation cited above and for the cooperation that was extended to me during my inspection of Lincoln Memorial Crematorium. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Adam Bogner
Environmental Engineer
Air Quality Division
586-854-1517

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE