



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

January 29, 2020

Mr. Dustin Rice, Operations Manager  
Genesee Cremation Center, Inc.  
10510 North Holly Road  
Holly, Michigan 48442

SRN: N7552, Genesee County

Dear Mr. Rice:

**VIOLATION NOTICE**

On August 28, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Genesee Cremation Center, Inc. located at 10510 N. Holly Road, Grand Blanc, Michigan. The purpose of this inspection was to determine Genesee Cremation Center, Inc.'s (Genesee Cremation) 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) number 301-05, 134-09, and 11-17

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCREMATORY2, a Matthews Cremation Power-Pak II Ultra natural gas-fired crematory incinerator	PTI No. 134-09	One-time instance of pharmaceutical waste incineration
Paint booth	Rule 287(2)(c)	Permit exemption of Rule 287(2)(c) was not met, because particulate filter was absent

During the inspection, AQD was informed that at some point within the last several years, Genesee Cremation had been approached by a local law enforcement agency to burn a small bag of pharmaceutical waste. It is my understanding that this was burned in one of the crematory incinerators, per the agency's request. Subsequent discussion by telephone with one of Genesee Cremation's staff indicated that EUCREMATORY2 was the crematory incinerator most likely utilized for this.

This instance of burning pharmaceutical waste constitutes a violation of PTI No. 134-09, Special Condition II. 1, which states:

“The permittee shall not burn any waste in EUCREMATORY2 other than the following:  
**(40 CFR 60.51c)**

**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 human pathological waste and associated materials.”**

Additionally, during the inspection, AQD staff observed the paint booth onsite, where acrylic paint is rolled onto plaques for burial vaults, and commercially available cans of spray paint are occasionally used. The coating booth did not have a particulate filter, such as a mat or panel filter, installed. A coating booth may be considered exempt from the requirement of Michigan Air Pollution Control Rule 201 to obtain a permit to install, provided it satisfies the exemption criteria for a relevant permit exemption, such as that contained within Rule 287(2)(c). This rule exempts the following:

“(c) A surface coating line if all of the following conditions are met:

- (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.
- (ii) Any exhaust system that serves only coating spray equipment is supplied with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer’s specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.
- (iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the department upon request.

Due to a particulate filter not installed for the paint booth, the permit exemption criteria of Rule 287(2)(c) has not been met, at this time. A program for compliance may include installing a particulate filter, or instead submitting a completed PTI application for the paint booth. An application form is available by request, or at the following website: [www.michigan.gov/air](http://www.michigan.gov/air) (in the shaded box on the upper right-hand side of the page).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 19, 2020 (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

Mr. Dustin Rice  
Page 3  
January 29, 2020

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, Lansing District, at Constitution Hall, 525 West Allegan, First Floor South, P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Genesee Cremation 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 Genesee Cremation. 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,



Daniel A. McGeen  
Environmental Quality Analyst  
Air Quality Division  
517-284-6638

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