



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

February 25, 2022

VIA E-MAIL

Mr. Tim Burrows, Cemetery Director
Resurrection Cemetery
18201 Clinton River Road
Clinton Township, MI 48038

SRN: N7745, Macomb County

Dear Mr. Burrows:

VIOLATION NOTICE

On February 15, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Resurrection Cemetery located at 18201 Clinton River Road, Clinton Township, Michigan. The purpose of this inspection was to determine Resurrection Cemetery'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) number 3-22.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Two crematory furnaces – EUCREMATORY1 and EUCREMATORY3	PTI No. 3-22 FG1995CREMATORY Section IV – Special Condition 2.	Furnaces were not equipped with a device to monitor and record the secondary combustion chamber temperature.
Two crematory furnaces – EUCREMATORY1 and EUCREMATORY3	PTI No. 3-22 FG1995CREMATORY Section VI – Special Conditions 2 and 5.	Records of secondary combustion temperature are not maintained on a continuous basis.
Crematory furnace - EUCREMATORY2	PTI No. 3-22 EUCREMATORY2 Section IV – Special Condition 2.	Temperature recorder was not calibrated correctly. Circular charts were reading 200°F above actual operating temperature.

Crematory furnace – EUCREMATORY2	PTI No. 3-22 EUCREMATORY2 Section III – Special Condition 1.	Waste combustion was started while the secondary combustion temperature was below 1600°F.
EUCREMATORY2	EUCREMATORY2 Section III – Special Condition 2.	Furnace is not operated in a satisfactory manner to control emissions. Waste combustion was started while the secondary combustion temperature was below 1600°F.
EUCREMATORY2	EUCREMATORY2 Section IV – Special Condition 1.	Secondary combustion chamber is not operated in a satisfactory manner to control emissions. Waste combustion was started while the secondary combustion temperature was below 1600°F.

Resurrection Cemetery operated EUCREMATORY1 and EUCREMATORY2 without installing a device to monitor and record the secondary combustion chamber temperature on a continuous basis. Resurrection Cemetery must install, calibrate, maintain, and operate in a manner satisfactory to the AQD District Supervisor, a device to monitor and record the temperature in the secondary combustion chamber of EUCREMATORY1 and EUCREMATORY2 on a continuous basis. Records of secondary combustion chamber temperature must be kept and made available to an AQD inspector if requested.

Resurrection Cemetery operated EUCREMATORY2 while the secondary combustion chamber continuous temperature monitor (circular chart) was not calibrated correctly. It was observed that while the furnace was operating at 1610°F, the circular chart recorder was outputting close to 1800°F. All recent records of continuous temperature show that the furnace is operated close to 1800°F while the set point has always been 1615°F.

Resurrection Cemetery cremated remains in EUCREMATORY2 while the secondary combustion temperature was below 1600°F. Resurrection Crematory staff stated that this furnace cannot reach 1600°F prior to turning on the primary burner; however, in Resurrection Crematory’s permit to install application, the facility implied that this furnace was capable of reaching 1600°F during preheat. Only the two older furnaces were mentioned in the permit to install application as not being able to reach a secondary combustion chamber temperature of 1600°F unless they have help from the cremation chamber once it is loaded.

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As part of the response to this violation, please contact Matthew's Cremation and obtain a written document stating that this specific furnace cannot be started with a minimum secondary combustion chamber temperature of 1600°F.

If Resurrection Crematory cannot start operation of EUCREMATORY2 with a minimum secondary combustion chamber temperature of 1600°F, then the Resurrection Crematory must submit a permit to install modification to allow for this unit to begin cremation at a lower temperature.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 18, 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 violation 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.

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 Resurrection Cemetery 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 resurrection cemetery. 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,



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