



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

April 4, 2022

VIA E-MAIL AND U.S. MAIL

Ms. Suzanne Kay Pietrandrea, President  
Great Lakes Cremation Service Inc.  
16523 Horseshoe Drive  
Northville, MI 48168

SRN: N8339, Oakland County

Dear Ms. Pietrandrea:

**VIOLATION NOTICE**

On March 14 and March 18, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Great Lakes Cremation Service located at 29547 Costello Drive, New Hudson, Michigan. On February 16, 2022, EGLE AQD conducted an ongoing complaint investigation. The purpose of these inspections and the complaint investigation was to determine Great Lakes Cremation Service'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 232-09B and 61-15; and to investigate a recent complaint received on February 16, 2022 regarding black smoke, foul odors and flames attributed to Great Lakes Cremation Service's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCREMATORY2	PTI No. 232-09B, Special Condition III.2 and R 336.1910.	On February 15 and 16, 2022, the permittee failed to operate the incinerator in a satisfactory manner to control emissions because flames were emitted from the exhaust stack.
EUCREMATORY1	PTI No. 232-09B, Special Condition III.1, and R 336.1910.	The temperature chart record for March 8, 2022 indicates the permittee failed to maintain a minimum temperature of 1600 °F in the secondary combustion chamber while combusting waste and the permittee failed to operate the air cleaning device in a satisfactory manner.

EUCREMATORY1	PTI No. 232-09B, Special Condition VI.2	The permittee's cremation log (cremation number 39787) for March 6, 2022, did not satisfactorily record the end time (time out) and duration because the record is illegible due to overlapping text.
EUCREMATORY2	PTI No. 232-09B, Special Condition III.1, and R 336.1910.	The temperature chart record for March 11, 2022, indicates the permittee failed to maintain a minimum temperature of 1600 °F in the secondary combustion chamber while combusting waste and the permittee failed to operate the air cleaning device in a satisfactory manner.
EUCREMATORY2	PTI No. 232-09B, Special Condition VI.3.	The permittee failed to keep, in a satisfactory manner, secondary combustion chamber temperature records on March 11 and March 14, 2022, because multiple temperature chart records overlapped.
EUCREMATORY3	PTI No. 232-09B, Special Condition VI.3.	On January 4, 8 and 28, 2021, February 12 and 22, 2021, March 10, 2021, April 14, 2021, May 18, 2021, July 11, 2021, and March 11, 2022, the permittee failed to keep, in a satisfactory manner, secondary combustion chamber temperature records for EUCREMATORY3. No temperature records were recorded because the permittee failed to replace the chart recorder pen after the ink ran out.
EUCREMATORY4	PTI No. 232-09B, Special Condition III.1 and R 336.1910.	The temperature chart record for March 8, 2022 indicates the permittee failed to maintain a minimum temperature of 1600 °F in the secondary combustion

		chamber while combusting waste and the permittee failed to operate the air cleaning device in a satisfactory manner.
EUCREMATORY5	PTI No. 61-15, Special Condition III.1, and R 336.1910.	The temperature chart record for March 7, 2022, indicates the permittee failed to maintain a minimum temperature of 1600 °F in the secondary combustion chamber while combusting waste and the permittee failed to operate the air cleaning device in a satisfactory manner.
EUCREMATORY5	PTI No. 61-15, Special Conditions VI.1 and VI.5.	The permittee failed to keep, in a satisfactory manner, secondary combustion chamber temperature records on March 7, 2022, because multiple temperature chart records overlapped.
EUCREMATORY3, EUCREMATORY4, and EUCREMATORY5.	PTI No. 232-09B, EUCREMATORY3, EUCREMATORY4, Special Condition VI.4, and PTI 61-15 EUCREMATORY5, Special Condition VI.6.	The permittee failed to provide requested records of service, maintenance, and equipment inspections when AQD requested such records on March 18, 2022. Only two service records were provided, which were dated July 29, 2020 and November 9, 2020.

Per an ongoing complaint investigation conducted on February 16, 2022, the AQD determined that on February 15 and 16, 2022, flames were emitted from the EUCREMATORY2 exhaust stack. This is in violation of PTI No. 232-09B, EUCREMATORY2 Special Condition III.2, which states in part, "The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EUCREMATORY2." This is also 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 the on-site inspection conducted on March 14, 2022, the AQD observed that the EUCREMATORY1 temperature chart record for March 8, 2022, indicates the permittee failed to maintain a minimum temperature of 1600 °F in the secondary combustion chamber while combusting waste. This is a violation of PTI No. 232-09B, EUCREMATORY1 Special Condition III.1, which states, "The permittee shall not combust waste in EUCREMATORY1 unless a minimum temperature of 1600 °F and a minimum retention time of 1.0 seconds in the secondary

combustion chamber are maintained.” This also is in 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 provided during the on-site inspection conducted on March 14, 2022, the AQD observed the permittee’s EUCREMATORY1 cremation log (cremation number 39787) for March 6, 2022, did not satisfactorily record the end time (time out) and duration because the record is illegible due to overlapping text. This is a violation of PTI No. 232-09B, Special Condition VI.2, which states in part, “The permittee shall keep, in a satisfactory manner, daily records of the time (duration of burn), description and weight of waste combusted in EUCREMATORY1, as required by SC II.1 and SC II.2.”

Per the on-site inspection conducted on March 14, 2022, the AQD observed that the EUCREMATORY2 temperature chart record for March 11, 2022, indicates the permittee failed to maintain a minimum temperature of 1600 °F in the secondary combustion chamber while combusting waste. This is a violation of PTI No. 232-09B, EUCREMATORY2 Special Condition III.1, which states, “The permittee shall not combust waste in EUCREMATORY2 unless a minimum temperature of 1600 °F and a minimum retention time of 1.0 seconds in the secondary combustion chamber are maintained.” This is also in 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 the on-site inspection conducted on March 14, 2022, the AQD observed that the permittee failed to keep, in a satisfactory manner, EUCREMATORY2 secondary combustion chamber temperature records on March 11 and March 14, 2022, because multiple temperature chart records overlapped. This is a violation of PTI No. 232-09B, EUCREMATORY2 Special Condition VI.3., which states in part, “The permittee shall keep, in a satisfactory manner, secondary combustion chamber temperature records for EUCREMATORY2, as required by SC IV.1.”

Per the on-site inspection conducted on March 14, 2022, the AQD observed that the permittee failed to keep, in a satisfactory manner, EUCREMATORY3 secondary combustion chamber temperature records on January 4, 8, and 28, 2021; February 12 and 22, 2021; March 10, 2021; April 14, 2021; May 18, 2021; July 11, 2021; and March 11, 2022. No temperatures were recorded during the mentioned period because the permittee failed to replace the chart recorder pen after the ink ran out. This is a violation of PTI No. 232-09B, EUCREMATORY3 Special Condition VI.3., which states in part, “The permittee shall keep, in a satisfactory manner, secondary combustion chamber temperature records for EUCREMATORY3, as required by SC IV.1.”

Per the on-site inspection conducted on March 14, 2022, the AQD observed that the EUCREMATORY4 temperature chart record for March 8, 2022, indicates the permittee failed to maintain a minimum temperature of 1600 °F in the secondary combustion chamber while combusting waste. This is a violation of PTI No. 232-09B, EUCREMATORY4 Special Condition III.1, which states, “The permittee shall not combust waste in EUCREMATORY4 unless a minimum temperature of 1600 °F and a minimum retention time of 1.0 second in the secondary combustion chamber are maintained.” This is also in 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 the on-site inspection conducted on March 14, 2022, the AQD observed that the EUCREMATORY5 temperature chart record for March 7, 2022, indicates the permittee failed to maintain a minimum temperature of 1600 °F in the secondary combustion chamber while combusting waste. This is a violation of PTI No. 61-15, EUCREMATORY5 Special Condition III.1, which states, "The permittee shall not combust waste in EUCREMATORY5 unless a minimum temperature of 1600 °F and a minimum retention time of 1.0 second in the secondary combustion chamber are maintained." This is also in 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 the on-site inspection conducted on March 14, 2022, the AQD observed that the permittee failed to keep, in a satisfactory manner, secondary combustion chamber temperature records on March 7, 2022, for EUCREMATORY5 because multiple temperature chart records overlapped. This is a violation of PTI No. 61-15, EUCREMATORY5 Special Condition VI.1, which states in part, "The permittee shall complete all required records in a format acceptable to the AQD District Supervisor." This is also a violation of PTI No. 61-15, EUCREMATORY5 Special Condition VI.5, which states in part, "The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, secondary combustion chamber temperature records for EUCREMATORY5, as required by SC VI.2."

Per the on-site inspection conducted on March 18, 2022, upon request, the permittee failed to provide recent records of service, maintenance, and equipment inspections. Only two service records were provided, which were dated July 29, 2020 and November 9, 2020.

The failure to provide records of service, maintenance, and equipment inspections is a violation of PTI No. 232-09B, EUCREMATORY3 Special Condition VI.4, which states, "The permittee shall keep, in a satisfactory manner, a record of all service, maintenance and equipment inspections for EUCREMATORY3. The records shall include the description, reason, date and time of the service, maintenance or inspection. The permittee shall keep all records on file and make them available to the department on request."

The failure to provide records of service, maintenance, and equipment inspections is a violation of PTI No. 232-09B EUCREMATORY4 Special Condition VI.4, which states, "The permittee shall keep, in a satisfactory manner, a record of all service, maintenance and equipment inspections for EUCREMATORY4. The records shall include the description, reason, date and time of the service, maintenance or inspection. The permittee shall keep all records on file and make them available to the department on request."

The failure to provide records of service, maintenance, and equipment inspections is a violation of PTI No. 61-15, EUCREMATORY5 Special Condition VI.6, which states, "The permittee shall keep, in a satisfactory manner, a record of all service, maintenance and equipment inspections for EUCREMATORY5. The record shall include the description, reason, date and time of the service, maintenance or inspection. The permittee shall keep all records on file and make them available to the Department upon request."

Please also be advised that per the inspections conducted on March 14 and March 18, 2022, and follow-up email on March 22, 2022, and March 29, 2022, the updated Malfunction Abatement Program and a Compliance Program are due Wednesday, April 6, 2022.

Ms. Suzanne Kay Pietrandrea  
Great Lakes Cremation Service Inc.  
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 25 (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.

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

If Great Lakes Cremation Service 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 March 14 and 18, 2022. 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](mailto:elmouchir@michigan.gov)

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