DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Scheduled Inspection

SUBJECT: Scheduled inspection	n.	
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
CONTACT: John Cream, Crematory Operator		ACTIVITY DATE: 06/19/2015
CITY: CHESTERFIELD		COUNTY: MACOMB
LOCATION: 28165 KEHRIG, CHESTERFIELD		DISTRICT: Southeast Michigan
FACILITY: FOREVER FAITHFUL PET CREMATION SERVICE		SRN / ID: P0303

On June 19, 2015, I conducted scheduled inspection of Forever Faithful Pet Cremation Service (FFP) located at 28165. Kehrig Street, Troy, Michigan. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; the conditions of General Air Use Permit to Install (PTI) No. 178-11.

This facility is uniquely identified by the Air Quality Division (AQD) with State Registration Number (SRN) **P0303**.

I entered the site, met with Mr. John Cream, Crematory Operator; and Ms. Trisha Rodgers, Office Manager. I presented photo identification and explained the purpose of the inspection during the opening meeting.

This facility is only permitted to cremate 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 only animal pathological waste and associated materials and does not authorize cremation of human remains.

Per my request, Mr. Cream had scheduled the first animal cremation of the day to coincide with the inspection. This was a group animal cremation with a total weight of 315 pounds, which is in compliance with the maximum charge limit of 450 pounds per charge. Because the cremation unit was not operated during the previous day, the starting primary combustion chamber temperature was about 350 degrees F. Mr. Cream ignited the secondary combustion chamber burner at 11:01 a.m. The secondary combustion chamber temperature monitor displayed a rapidly rising temperature that peaked at about 1400 degrees F at 12:15 p.m. For some unknown reason, Mr. Cream was unable to achieve a secondary combustion chamber temperature of 1600 degrees F as required per PTI 178-11.

Mr. Cream and I discussed this compliance issue regarding the permit required minimum secondary combustion chamber temperature of 1600 degrees F. Mr. Cream verbally committed to getting the cremation unit serviced as quickly as possible to correct this issue. Mr. Cream also verbally committed to achieving the permit required minimum secondary combustion chamber temperature by igniting the primary burners before charging the cremation unit with animal remains.

Per my request, Mr. Cream started the burners in the primary combustion chamber while I was positioned outside to observe opacity. A person's ability to observe the exhaust stack is limited by the location of the stack and the building height. I was able to observe the stack by standing next to the mailbox of neighboring business to the north. I observed the heat distortion created by the hot exhausting air and observed zero visible emissions for about 15 minutes. It's important to note that I would typically observe 10 to 30 seconds of visible emissions sometime during the first 10 minutes of a cremation. One possible reason that I did not observe any visible emissions may be that FFP freezes animal remains before the cremation process, which slows the initial burn rate.

The exhaust stack height and diameter appear to be in compliance with the specified permit dimensions.

A recordkeeping review revealed some deficiencies, which were corrected in a timely manner after the inspection. On July 8, 2015, the AQD received records, which appear to indicate compliance with all permit required recordkeeping.

CONCLUSION

Forever Faithful Pet Cremation Service (FFP) appears to be in compliance with all evaluated permit conditions. The observed recordkeeping deficiencies were corrected in a timely manner. I have elected to use enforcement discretion because this is the first inspection of this facility since the permit to install was issued. I informed Mr. Cream and Ms. Rodgers that the AQD may issue a violation notice if the recordkeeping deficiencies are observed during a subsequent inspection.

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DATE 2/291 , SUPERVISOR