DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

2032/2614/		Lanutan noon
FACILITY: HURON FOREST CREMATORY INC		SRN / ID: P0327
LOCATION: 4721 INDUSTRIAL ROW, OSCODA		DISTRICT: Saginaw Bay
CITY: OSCODA		COUNTY: IOSCO
CONTACT:		ACTIVITY DATE: 08/07/2014
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled site inspe	ection of newly constructed crematory in Oscoda, Mic	higan.
RESOLVED COMPLAINTS:		The state of the s

On July 22, 2014, AQD District Staff attempted to conduct a scheduled site inspection for the Huron Forest Crematory (P0327),4721 Industrial Row, Au Sable Township Industrial Park, Oscoda, losco County, Michigan. Upon arrival staff noted that there was no sign at the road, and that there was no sign of occupancy in the building. No posted contact information or office hours were on the building. District Staff left a business card in the door requesting a call.

District Staff received a phone call later that same week, indicating that the facility was open, but that it had varying hours of operation based on client needs. The facility indicated that they anticipated being active the week of August 4, 2014, and a meet time was scheduled to conduct the site inspection for the facility which was constructed the previous fall.

On August 7, 2014, AQD District Staff met Kurt Good and John Rudowski onsite to complete a scheduled site inspection. The purpose of the inspection was to determine if the facility was operating in general compliance with their Permit to Install (No. 41-12) which was issued on March 19, 2012.

FACILITY DESCRIPTION

The Huron Forest Crematory, Inc. (P0327) is located in the AuSable Township Industrial Park at 4721 Industrial Row, Oscoda, Michigan. The facility provides cremation services for human pathological waste. Operational hours/facility activities are directly related to client needs.

One Permit (41-12) exists for the facility and was approved on March 19, 2012. Emission units on site are limited to the permitted cremation unit. The Emission Unit is a natural gas-fired, Model N-20 B&L Cremation System. Construction of the facility had not been initiated prior to approval of the permit. Facility operation began in October 2013.

COMPLIANCE EVALUATION

Operational Status – During the facility tour the facility was not in operation. Operations onsite are based on demand for services, which has been variable.

<u>Material Usage Rates</u> – Material limits associated with the permit for the facility limit the facility to use of natural gas only as fuel for the emission unit, and loading/charging of the emission unit to no more than 600 lbs of human pathological waste as defined in 40 CFR 60.51C.

During the site inspection, District Staff noted that the facility was limited to natural gas as a fuel source, no visible signs of propane or fuel oil tanks, or bio fuel supply was visible. Facility staff confirmed that only natural gas was used to fuel the emission unit.

Each charge received by the facility comes with documentation from the funeral home/source indicating the weight of the charge. This was confirmed by facility representatives. When loading the emission unit, facility representatives report that the charge is moved/transported on a cart with a weight scale to further confirm/document the weight of the charge being added to the emission unit. Documentation for each firing of the emission unit is maintained in compliance with the permit requirements.

<u>Operational Parameters</u> – Process or operational restrictions associated with the permit require a minimum temperature and retention time in the secondary combustion chamber, as well as proper installation-maintenance and operation of the emission unit to control emissions. The emission unit is

equipped with a low temperature light and continuous temperature monitor and recorder. The set operation temperature is just above the minimum temperature per permit.

The facility has three trained/certified operators, who follow the practices outlined for Incinerator Operation and Maintenance Guidelines in Appendix A of the permit. In addition, the facility indicated that annual inspection of the emission unit is recommended by the manufacturer, and will be scheduled when required.

Monitoring and Testing – No formal testing requirements are required under the existing permit. Monitoring requirements include continuous monitoring of temperature in secondary combustion chamber. The emission unit is equipped with a digital readout and a continuous recorder. Facility staff showed copies of each daily recording (disc) which documented the continuous temperature monitoring, and showed consistent and appropriate temps at the time of operation. On the discs they also documented each cremation job, in compliance with the permit.

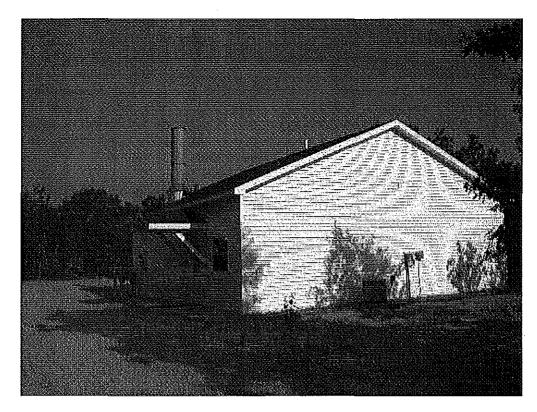
Record Keeping and Reporting – No reporting requirements are specified on the referenced permit. Recordkeeping requirements include:

- Continuous monitoring & recording of temperature in secondary combustion chamber.
- · Recording of daily records of duration of burn, description of materials combusted.
- Service, maintenance and equipment inspection records. Including the reason, date and time of the activity.

Other Requirements – Permit 40-12 sets an emission limit of 0.20 lb/1000 lbs of gas, corrected to 50% excess air. Testing requirements are upon request of the district, and have not been requested at this time. Facility staff reported that with the exception of a slight puff of smoke when the remains are in a body bag, there are no visible emissions associated with the operation of the equipment. Based on a discussion of the characteristics of that "puff" it does not appear that it would result in a violation of visible emission requirements outlined under the permit general conditions.

Summary

AQD District Staff conducted a scheduled site-inspection of the Huron Forest Crematory Facility (P0327) on August 7, 2014. Mr. Kurt Good and Mr. John Rudowski, certified operators at the facility were onsite at that time to answer questions and present records regarding facility operation. Based on the information collected during the August 7, 2014, site visit, it appears that the facility is being operated in compliance with its PTIs. sgl



<u>Image 1(Huron Forest)</u>: view of building from drive entrance, note one stack for the single emission unit- no signs, no posted hours or contact information.

NAME MOUDUS JUBBLE DATE 8/13/2014 SUPERVISOR C Sale

bing Maps

4721 Industrial Dr, Oscoda, MI 48750

My Notes

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