

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

P058868437

FACILITY: Trusted Journey Pet Memorial Services		SRN / ID: P0588
LOCATION: 3779 S ORTONVILLE ROAD, CLARKSTON		DISTRICT: Warren
CITY: CLARKSTON		COUNTY: OAKLAND
CONTACT: John Cream , Operations Manager		ACTIVITY DATE: 08/02/2023
STAFF: Marie Reid	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled on-site inspection		
RESOLVED COMPLAINTS:		

On August 2, 2023, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, I (Marie Reid) conducted an on-site scheduled inspection of Trusted Journey Pet Memorial Services (“Trusted Journey”) (SRN: P0588) located at 3779 S Ortonville Road, Clarkston, Michigan. The purpose of this inspection was to determine the facility’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) Nos. 20-15, 199-15, 66-20, and 42-22.

Permit Information/Background

Trusted Journey was originally owned by Animal Angels, LLC, in 2016 and the name was changed to Loyal Paws, LLC in 2018. Gateway Services purchased the property in 2021 and changed the name to Trusted Journey Pet Memorial Services. I updated the facility name and contact information in MACES.

Trusted Journey is a pet cremation service which offers private and communal cremations. On March 15, 2015, and November 19, 2015, PTI Nos. 20-15 and 199-15 were issued to operate two nearly identical Matthews Cremation Division cremation units (EUCREMATORY1 AND EUCREMATORY2). On July 1, 2020, PTI No. 66-20 was issued to operate a Matthews Cremation Division cremation unit (EUCREMATORY3). On April 12, 2022, PTI No. 42-22 was issued to operate a B&L Cremation Systems Three Chamber cremation unit (EUCREMATORY4).

Trusted Journey solely occupies the north and south half of a building that was previously shared with Rusty Relics, plus an adjacent warehouse that houses the crematoriums. The south half of the building that was previously owned by Rusty Relics is used as a cremains packaging area. Trusted Journey employs 6 people and operates 8:00 AM to 3:30 PM Monday – Friday.

Prior to cremation, remains are kept in totes and stored either in an air-conditioned room or a walk-in freezer. The units are preheated to at least 1600°F then charges are inserted into the furnace. Trusted Journey typically does 70% private cremations and 30% communal cremations. After private cremations, the cremains are transferred to a secondary processing station where they are cooled, screened for metals, ground to a dust, and placed into a container for the family. Communal cremains are collected by a company and buried at their facility. No cremains are buried on Trusted Journey’s property.

Introduction

I entered Trusted Journey and was greeted by John Cream, Operations Manager. I identified myself, showed photo identification, stated the purpose of the inspection, and toured the facility. Jeff Halperin, Primary Crematory Operator, was also present during the

inspection. John informed me that they had finished cremations for the day and no units were operating. Emission units were labeled.

Regulatory Analysis

PTI 20-15 – EUCREMATORY1

EMISSION LIMITS

SC I.1. Trusted Journey uses a closed-circuit television (CCTV) to visually monitor opacity for all three stacks. The live feed can be viewed on a TV mounted in the cremation room and John can view it on his phone. John said they occasionally observe a small amount of smoke for less than 60 seconds during startup that is less than 1/3 the stack height. This facility does not have a history of complaints and I did not observe any visible emissions during the inspection. Due to the information above, an emission test to verify compliance with the emission limit in SC I.1 has not been requested by the AQD.

MATERIAL LIMITS

SC II.1 According to the cremation logs, Trusted Journey only burns animal pathological waste and associated materials.

SC II.2 Limits the charge size of each cremation in EUCREMATORY1 to 400 lbs. I reviewed cremation logs that list charge weight. John explained that private cremations are done in any incinerator while communal cremations are done in EUCREMATORY1, EUCREMATORY2, and EUCREMATORY3 so they can spread out the charges for a more efficient burn.

On August 2, 2023, I saw a log that did not identify which unit the charge was burned in that said, "18 comm. 483lbs." I asked what this meant and which unit this charge was burned in since none of the incinerators used for communal cremations are permitted to burn charges over 400 lbs. Jeff explained that he records the weight for all communal cremation charges for the entire day and divides them equally into each unit, making sure not to overload the incinerators. He said that in this instance, there were 18 animals totaling 483lbs of communal charges he had to burn that day. He split the charges into EUCREMATORY1 and EUCREMATORY2, which is approximately 242lbs per unit. I did not observe any private or communal charges that exceeded 400 lbs in EUCREMATORY1.

I asked John and Jeff to start recording the communal charge weight for each individual unit rather than all three units combined. I also asked them to label each unit with its maximum charge weight to avoid accidentally overcharging a unit. John verbally agreed and said he would create a separate log sheet for communal cremations. He also asked an employee to make labels of the maximum charge weights for each unit. I observed him post them on each incinerator.

SC II.3 John informed me that only natural gas is used to fuel EUCREMATORY1. I did not see evidence to indicate otherwise.

PROCESS/OPERATIONAL RESTRICTIONS

SC III.1 I observed that the secondary combustion chamber has a set point temperature of 1625°F in EUCREMATORY1. John told me that all four incinerators are equipped with an interlock system where if the temperature in the secondary combustion chamber ever drops below the set point, the primary combustion chamber burners will turn off until the secondary combustion chamber is back to its set point. I reviewed temperature charts and verified the secondary combustion chamber has never operated below 1600°F while combusting waste.

SC III.2 The information in SC III.1 verifies that this incinerator is operated in a satisfactory manner to control emissions. Trusted Journey is following all operation guidelines in Appendix A of this permit.

DESIGN/EQUIPMENT PARAMETERS

SC IV.1 This machine is equipped with a chart recorder. The chart recorder confirms that the secondary combustion chamber operates at its set point of 1625°F in EUCREMATORY1. I did not see any records that indicate the chart recorder had malfunctioned since the last inspection.

SC IV.2 I verified the facility has a scale to weight charges.

MONITORING/RECORDKEEPING

VI.2 & VI.5 The chart recorder logs verify that the permittee monitors and records temperature in the secondary combustion chamber on a continuous basis. I confirmed that records are kept on file.

VI.3 Cremation logs record the date, description, and charge weight. Private cremation charge weights are properly recorded in the cremation logs. Charge weight for communal cremations is recorded for EUCREMAORY1, EUCREMATORY2, and EUCREMATORY3 combined instead of each unit individually. This shall be cited in a violation notice.

Start and stop times are recorded with an online system called "paws-e-track". I asked John to start recording the start and stop time on the cremation logs as well to make cross referencing recordkeeping easier for both Trusted Journey and AQD staff. John verbally agreed to record start and stop time in the cremation log as well.

VI.4 Records of when pathological waste is burned are maintained on a calendar quarter basis. Only pathological waste is burned at Trusted Journey.

VI.6 I reviewed weekly maintenance records for EUCREMATORY1. The maintenance logs include the date, unit, operator signature, maintenance checklist, and notes of any issues/repairs.

STACK/VENT RESTRICTIONS

VIII.1 I did not verify stack parameters during this inspection.

PTI 199-15 – EUCREMATORY2

EMISSION LIMITS

SC I.1 Due to the information in PTI 20-15, EUCREMATORY1, SC I.1, an emission test to verify compliance with the emission limit in SC I.1 has not been requested by the AQD.

MATERIAL LIMITS

SC II.1 According to the cremation logs, Trusted Journey only burns animal pathological waste and associated materials.

SC II.2 Limits the charge size of each cremation in EUCREMATORY2 to 400 lbs. I reviewed cremation logs that list charge weight, and I did not observe any private or communal charges that exceeded 400 lbs in EUCREMATORY2. See PTI 20-15, EUCREMATORY1, SC II.2 for communal cremation recordkeeping.

SC II.3 John informed me that only natural gas is used to fuel EUCREMATORY2. I did not see evidence to indicate otherwise.

PROCESS/OPERATIONAL RESTRICTIONS

SC III.1 I observed that the secondary combustion chamber has a set point temperature of 1650°F in EUCREMATORY2. John told me that all four incinerators are equipped with an interlock system where if the temperature in the secondary combustion chamber ever drops below the set point, the primary combustion chamber burners will turn off until the secondary combustion chamber is back to its set point. I reviewed temperature charts and verified the secondary combustion chamber has never operated below 1600°F while combusting waste.

SC III.2 The information in SC III.1 verifies that this incinerator is operated in a satisfactory manner to control emissions. Trusted Journey is following all operation guidelines in Appendix A of this permit.

DESIGN/EQUIPMENT PARAMETERS

SC IV.1 This machine is equipped with a chart recorder. The chart recorder confirms that the secondary combustion chamber operates at its set point of 1650°F in EUCREMATORY2. I did not see any records that indicate the chart recorder had malfunctioned since the last inspection.

SC IV.2 I verified the facility has a scale to weight charges.

MONITORING/RECORDKEEPING

VI.2 & VI.5 The chart recorder temperature logs verify that the permittee monitors and records temperature in the secondary combustion chamber on a continuous basis. I confirmed that records are kept on file.

VI.3 Cremation logs record the date, description, and charge weight. Private cremation charge weights are properly recorded in the cremation logs. Charge weight for communal cremations is recorded for EUCREMAORY1, EUCREMATORY2, and EUCREMATORY3 combined instead of each unit individually. This shall be cited in a violation notice.

Start and stop times are recorded with an online system called "paws-e-track". I asked John to start recording the start and stop time on the cremation logs as well to make cross referencing recordkeeping easier for both Trusted Journey and AQD staff. John verbally agreed to record start and stop time in the cremation log as well.

VI.4 Records of when pathological waste is burned are maintained on a calendar quarter basis. Only pathological waste is burned at Trusted Journey.

VI.6 I reviewed weekly maintenance records for EUCREMATORY1. The maintenance forms include the date, unit, operator signature, maintenance checklist, and notes of any issues/repairs.

STACK/VENT RESTRICTIONS

VIII.1 I did not verify stack parameters during this inspection.

PTI 66-20 – EUCREMATORY3 **EMISSION LIMITS**

SC I.1 Due to the information in PTI 20-15, EUCREMATORY1, SC I.1, an emission test to verify compliance with the emission limit in SC I.1 has not been requested by the AQD.

MATERIAL LIMITS

SC II.1 According to the cremation logs, Trusted Journey only burns animal pathological waste and associated materials.

SC II.2 Limits the charge size of each cremation in EUCREMATORY3 to 300 lbs. I reviewed cremation logs that list charge weight, and I did not observe any private or communal charges that exceeded 300 lbs in EUCREMATORY2. See PTI 20-15, EUCREMATORY1, SC II.2 for communal cremation recordkeeping.

SC II.3 John informed me that only natural gas is used to fuel EUCREMATORY2. I did not see evidence to indicate otherwise.

PROCESS/OPERATIONAL RESTRICTIONS

SC III.1 I observed that the secondary combustion chamber has a set point temperature of 1650°F in EUCREMATORY3. John informed me that the chart recorder has not been operational since January 1, 2023, so I could not confirm that the incinerator operates above 1600°F. All four incinerators are equipped with an interlock system where if the temperature in the secondary combustion chamber ever drops below the set point, the primary combustion chamber burners will turn off until the secondary combustion chamber is back to its set point. However, John informed me that EUCREMATORY3 is the only unit that will not automatically shut down if the secondary combustion chamber temperature drops below 1600°F. Since there was no device to record temperature, I could not determine if the incinerator operated above 1600°F. This will be cited in a violation notice.

SC III.2 Due to the information in SC III.1 this incinerator is not operated in a satisfactory manner to control emissions. This will be cited in a violation notice. Trusted Journey is following all operation guidelines in Appendix A of this permit.

DESIGN/EQUIPMENT PARAMETERS

SC IV.1 Due to the information in SC III.1, the permittee is not operating the afterburner in a satisfactory manner. This will be cited in a violation notice.

SC IV.2 John informed me that the circular temperature chart recorder for EUCREMATORY3 has been broken since January 1, 2023, which I confirmed with the weekly maintenance logs. John said he ordered a replacement chart recorder in January but was told it would take around 6 months to deliver. I asked John not to use EUCREMATORY3 until they receive the new chart reader since they have 5 other primary chambers available for cremations. John verbally agreed and said he would call me once the new chart recorder is installed. John left me a voicemail on August 7, 2023, stating that they received and installed the new chart recorder for EUCREMATORY3. Trusted Journey will receive a violation notice for not calibrating and maintaining a device to measure the temperature in the secondary combustion chamber on a continuous basis.

SC IV.3 I verified the facility has a scale to weight charges.

MONITORING/RECORDKEEPING

VI.2 & VI.5 From January 1, 2023, through August 7, 2023, continuous secondary combustion chamber temperatures were not recorded or maintained due to a broken chart recorder. This will be cited in a violation notice.

VI.3 Cremation logs record the date, description, and charge weight. Private cremation charge weights are properly recorded in the cremation logs. Charge weight for communal cremations is recorded for EUCREMAORY1, EUCREMATORY2, and EUCREMATORY3 combined instead of each unit individually. This shall be cited in a violation notice.

Start and stop times are recorded with an online system called "paws-e-track". I asked John to start recording the start and stop time on the cremation logs as well to make cross referencing recordkeeping easier for both Trusted Journey and AQD staff. John verbally agreed to record start and stop time in the cremation log as well.

VI.4 Records of when pathological waste is burned are maintained on a calendar quarter basis. Only pathological waste is burned at Trusted Journey.

VI.6 I reviewed weekly maintenance records for EUCREMATORY1. The maintenance forms include the date, unit, operator signature, maintenance checklist, and notes of any issues/repairs.

STACK/VENT RESTRICTIONS

VIII.1 I did not verify stack parameters during this inspection.

PTI 42-22 – EUCREMATORY4

EMISSION LIMITS

SC I.1 Due to the information in PTI 20-15, EUCREMATORY1, SC I.1, an emission test to verify compliance with the emission limit in SC I.1 has not been requested by the AQD.

MATERIAL LIMITS

SC II.2 Limits the charge size of each cremation to 500 lbs. Only private cremations are done in EUCREMATORY4. I reviewed cremation logs and confirmed that charges never exceeded 500 lbs.

SC II.3 John informed me that only natural gas is used to fuel EUCREMATORY4. I did not see evidence to indicate otherwise.

PROCESS/OPERATIONAL RESTRICTIONS

SC III.1 John stated that the set point of the secondary combustion chamber is 1650°F and has not experienced any issues with the temperature dropping below that. I reviewed temperature charts that verify the secondary combustion chamber has never operated below 1600°F while combusting waste.

SC III.2 Conditions SC II.2 and SC III.1 verify that this incinerator is operated in a satisfactory manner to control emissions. Trusted Journey is following all operation guidelines in Appendix A of this permit.

DESIGN/EQUIPMENT PARAMETERS

SC IV.1 Based on the information in SC I.1, SC III.1 & III.2, I can confirm that the afterburner is maintained and operated in a satisfactory manner.

SC IV.2 The chart recorder for EUCREMATORY4 was operational. I did not see any temperature chart records that indicate the chart recorder had malfunctioned since the last inspection.

SC IV.3 I verified the facility has scales to weight charges.

TESTING/SAMPLING

SC V.1 The AQD district supervisor has not requested PM emissions testing.

MONITORING/RECORDKEEPING

VI.2 & VI.5 The chart recorder temperature logs verify that the permittee monitors and records temperature in the secondary combustion chamber on a continuous basis. Records are kept on file.

VI.3 Cremation logs record the date, description, and charge weight. Start and stop times are recorded with an online system called "paws-e-track". I asked John to start recording the start and stop time on the cremation logs as well to make cross referencing recordkeeping easier for both Trusted Journey and AQD staff. John verbally agreed to edit the cremation log to include a section to record start and stop time of cremations.

VI.4 Records of when pathological waste is burned are maintained on a calendar quarter basis. Only pathological waste is burned at Trusted Journey.

VI.6 I reviewed weekly maintenance records for EUCREMATORY1. The maintenance forms include the date, unit, operator signature, maintenance checklist, and notes of any issues/repairs.

Appendix A is a list of operation and maintenance guidelines in this permit which I addressed below. Appendix A applies to all four furnaces at this facility.

Appendix A:

1. John and Jeff are both trained operators.
2. Grates are cleaned before each cremation.
3. Waste is combusted in EUCREMATORY1, EUCREMATORY2, and EUCREMATORY4 once the secondary combustion chamber (afterburner) temperature is above 1600°F. See PTI 66-20, EUCREMATORY3, SC III.1.
4. Cremation logs verify that the incinerators are not overloaded. SC II.2 states improved recordkeeping practices for communal cremations.
5. Jeff stated that the heaviest charges are burned at the start of each day and that he waits at least one hour to check the progress of cremations for safety reasons and to prevent letting cold air into the primary chamber.
6. Cremation logs verify that only animal pathological waste is burned at Trusted Journey.
7. Jeff conducts weekly maintenance checks on the units where he checks combustion air ratios.
8. Stacks are frequently observed during cremations.
9. Manufacturer manuals are in the office near the incinerator.
10. Jeff conducts weekly inspections and maintenance on all units. If neither Jeff nor John are qualified to perform certain maintenance tasks or repairs, a third party is contracted out. John and Jeff are very knowledgeable on the operation and maintenance of the incinerators. John stated that they always make sure to have

thermocouples, belimos, spark plugs, and other spare parts on hand in case of an equipment failure during an operation. John noted that it is important not to operate the incinerators too hot, because he noticed that increases the frequency of thermocouple failures.

Conclusion

As of this inspection, Trusted Journey Pet Memorial Services is not compliant with PTI No. 20-15, EUCREMATORY1, VI.3, PTI No. 199-15, EUCREMATORY2, VI.3, and PTI No. 66-20, EUCREMATORY3, III.1, III.2, IV.1, IV.2, VI.2, VI.3, and VI.5, which shall be cited in a violation notice. A summary of the violations will be listed below.

EUCREMATORY1, EUCREMATORY2, & EUCREMAORY3 SC VI.3 – The permittee did not properly record charge weight for communal cremations. The charge weight was recorded for communal cremations in all three units instead of for each unit individually.

EUCREMATORY3 SC III.1, III.2, IV.1, IV.2, VI.2, & VI.5 – A device to monitor and record the temperature in the secondary combustion chamber on a continuous basis was not operational from January 1, 2023, to August 7, 2023. Since there was no device to record temperature, I could not determine if the incinerator operated above 1600°F.

NAME *Mark Reid*

DATE 08/17/2023

SUPERVISOR *K Kelly*