

**Surrey Veterinary Clinic**  
**3598 S Clare Ave Clare, MI 48617**  
**(989) 386-9200**

March 19, 2018

Ms. Meg Sheehan  
Environmental Quality Analyst  
MDEQ – Air Quality Division  
401 Ketchum Street, Suite B  
Bay City, MI 48708

Re: Response to February 28<sup>th</sup> Letter of Violation for PTI 165-16 – Surrey Veterinary Clinic

Dear Ms. Sheehan,

This is in response to the Letter of Violation (LOV) dated February 28<sup>th</sup> regarding our Pet Crematory (incinerator), installed consistent with Permit to Install PTI 165-16. The LOV indicated that:

1. Company was *unable to produce adequate maintenance records and this did not comply with Special Condition VI.6*, and
2. *The (waste) charge was being put into the crematory before the Secondary combustion chamber temperature reached 1600F (871C).*

After discussions with the original equipment supplier and others, we offer the following solutions to address both of these issues.

- ***The Company was unable to produce adequate maintenance records –***

We have reviewed the maintenance record requirements included with the issued air permit (#165-16). We will maintain these records as required, whenever we operate the crematory. As an alternative, we are also contacting a resource for the possible addition of an improved (electronic) datalogger system that will help our staff better comply with our recordkeeping requirements and make it more efficient for AQD staff to review the operating data whenever they come visit our facility. If this new datalogging option looks promising, we would like to pull you into the discussions to make sure the information collected is consistent with what you intend to see during your future compliance reviews.

- ***Crematory Loading and Subsequent Batch Operation -***

I believe we have cleared up this misunderstanding prior to submitting this written response. The basic design of this equipment is relatively simple, intended to minimize operator error and promote worker safety and proper equipment operation.

The charge (waste) is placed into the Primary Chamber, the chamber door is closed and locked, the batch timer is set, the unit is activated, and the door to the unit is closed. At this point, the Secondary burner is fired for a minimum duration sufficient to pre-heat the Secondary Chamber reaches 1600F, before the burner in the Primary Chamber is activated to begin incineration of the charge.

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After the Crematory has completed the batch incineration cycle, the unit is allowed a cool-down period for safe ash removal and disposal. Many of our clients want the ashes from their individual pet, so there are many instances where we only process one animal at a time in this crematory unit.

To assure the Secondary Chamber reaches 1600F before the Primary burner is activated, we have contacted an equipment supplier and they have proposed to replace the original *Mediburn* control system with a newer, more effective option. The new controller can be electronically set to prevent firing of the Primary burner until the Secondary Chamber temperature reaches 1600F. Once this new controller replaces the existing *Mediburn* control system, the Secondary preheat limit (based on burn duration or temperature) will be determined and set as an operational parameter for the new controller system. At the end of this pre-heat cycle, the controller will then activate the Primary burner.

- ***Proposed Actions -***

Effective immediately, we will be maintaining our Crematory operating records consistent with what is specified in PTI 165-16, and are working with an equipment supplier to receive and install this updated controller as quickly as possible. We will also continue to search for an improved datalogging system to help minimize or eliminate our current manual recordkeeping procedures.

Based on very recent discussions with the controller supplier, we believe we can get the new controller on site within 1-2 weeks of receipt a Purchase Order, and another 1-2 weeks to complete installation. As this piece of equipment is critical to provide continuing services to our clients, and we are working with the equipment supplier to ship the new controller, have it installed, field calibrated and operational as quickly as possible to we can continue to offer this service to our clients. We will let you know when the new controller is installed, so you can schedule a visit to evaluate the Crematory's performance.

As mentioned previously, we are also investigating whether we can move most of our (permit) required recordkeeping to a more automated system to the betterment of staff and any future AQD inspections. As we gather more information concerning the availability and affordability of a more enhanced datalogging system, we will share this information with you. At that point, we can collectively decide as to whether it makes sense to install such a system or continue to rely on company staff to manually complete the PTI compliance records.

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Once again, we want to express our desire to operate our Pet Crematory equipment in a manner which complies with the air permit and look forward to making controller modifications to assure that the Primary Chamber will not be fired until the Secondary Chamber is pre-heated to a minimum of 1600F. If this response falls short of your expectations in any way, please contact me at (989) 386-9200, and I will work with you to resolve any unresolved issues you may have. We look forward to achieving and maintaining compliance for this equipment well into the future.

Sincerely,



Stephen R. Siegert, DVM

Cc: J Caudell