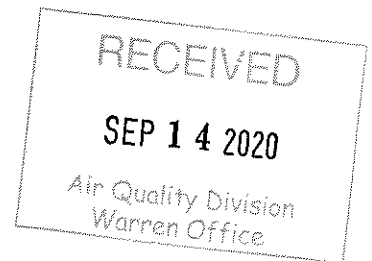


September 11, 2020

State of Michigan
Department of Environment, Great Lakes, and Energy (EGLE)
Air Quality Division (AQD)
Warren District Office
27700 Donald Court
Warren, MI 48092-2793
EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092-2793



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AQD personnel inspected my company, PACE (Pet and Animal Cremation Exchange) on August 20, 2020. The purpose of my communication is to respond to a violation notice which was written by Robert Elmouchi, dated August 25, 2020. Violations have never previously been found at PACE; we are committed to upholding rules and requirements which apply to our business. Below, I have responded to each of the 3 violations:

Process Description: EUBLP500

Violation: PTI No. 7-19, Special Conditions VI.2 and VI.5.

AQD Comments: The permittee did not change the circular chart paper frequently enough, which resulted in overlapping temperature records on November 26, 2019, December 3, 2019, July 15, and 21, 2020, and August 7, 2020.

Response by PACE:

Violations occurred November 26, 2019, December 3, 2019, July 15, and 21, 2020, and August 7, 2020. These violations were the result of oven-operator miscommunication on fully attempting to maximize the circular chart paper. Commencing on the day of your notification, August 25th, 2020, we began changing the circular chart paper at more frequent intervals and have further improved our procedures for keeping records of the temperatures in the secondary combustion chamber on a 24 hours basis by changing new circular chart paper. Specifically, we now mount a new circular chart paper on the EUBLP500 every morning. This will prevent any future data-overlap violation from occurring as the paper wheels are 24hrs in duration. We have documented this procedure and trained staff thoroughly to emphasize the importance of not allowing wheel-records to overlap. We have installed visual reminders (instructions) on the oven equipment to serve as continuous reminders for personnel to remember our procedures. The Business Manager will oversee the ongoing compliance to new protocol.

Process Description: EUBLP500M3

Violation: PTI No. 7-19, Special Conditions VI.2 and VI.5.

AQD Comments: The permittee did not change the circular chart paper frequently enough, which resulted in overlapping temperature records on June 20, and 25, 2019, September 21, and 25, 2019, December 20, 21, 27, and 28, 2019, and January 2, 2020.

Response by PACE:

Violations occurred on June 20, and 25, 2019, September 21, and 25, 2019, December 20, 21, 27, and 28, 2019, and January 2, 2020. These violations were the result of oven-operator miscommunication on fully attempting to maximize the circular chart paper.

Commencing on the day of your notification, August 25th, 2020, we began changing the circular chart paper at more frequent intervals and have further improved our procedures for keeping records of the temperatures in the secondary combustion chamber on a 24 hours basis by changing new circular chart paper. Specifically we now mount a new circular chart paper on the EUBLP500M3 every morning. This will prevent any future data-overlap violation from occurring as the paper wheels are 24hrs in duration. We have documented this procedure and trained staff thoroughly to emphasize the importance of not allowing wheel-records to overlap. We have installed visual reminders (instructions) on the oven equipment to serve as continuous reminders for personnel to remember our procedures. The Business Manager will oversee the ongoing compliance to new protocol.

Process Description: EUBLP500M3

Violation: PTI No. 7-19, Special Conditions VI.2 and VI.5.

AQD Comments: The permittee failed to replace the chart recorder ink pen frequently enough, which resulted in unreadable records. The temperature records for November 29, 2020, and December 1, 2, and 3, 2019, are unreadable because the ink is too faint or absent.

Response by PACE:

Inspected pens every week and change the ink monthly or more frequently if necessary.

Violations occurred November 29, 2020, and December 1, 2, and 3, 2019, These violations were the result of oven-operator miscommunication on fully attempting to maximize the ink.

Commencing on the day of your notification, August 25th, 2020, we changed the ink pens and will continue to do so at more frequent intervals. Specifically, we will inspect pens at the beginning and the end of each week and change the ink monthly or more frequently if necessary on the EUBLP500M3 every morning. We have documented this procedure and trained staff thoroughly to emphasize the importance of not allowing wheel-records to overlap. We have installed visual reminders (instructions) on the oven equipment to serve as continuous reminders for personnel to remember our procedures. The Business Manager will oversee the ongoing compliance to new protocol.

Sincerely,

Dr. Matthew Capitanio
Chief Executive Officer
PACE- Pet and Animal Cremation Exchange
36419 Groesbeck Highway Clinton Township, MI 48035

copy: Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE, AQD
P.O. Box 30260
Lansing, MI 48909-7760