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

P099354729

FACILITY: Pet & Animal Cremation Exchange		**SRN / ID:** P0993
LOCATION: 36419 Groesbeck Highway, CLINTON TWP		**DISTRICT:** Warren
CITY: CLINTON TWP		**COUNTY:** MACOMB
CONTACT: Dr. Matthew Capitanio , Chief Executive Officer		**ACTIVITY DATE:** 08/20/2020
STAFF: Robert Elmouchi	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:**
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

On August 20, 2020, I conducted a scheduled inspection of the Pet and Animal Cremation Exchange located at 36419 Groesbeck Highway, Clinton Township, Michigan. This facility is uniquely identified by the Air Quality Division with the State Registration Number (SRN) of P0993. 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; and the conditions of Permit to Install (PTI) No. 7-19.

Pet and Animal Cremation Exchange (PACE) performs individual and group cremations.
PACE is located near the center of a multiple occupancy industrial building. PACE is authorized per PTI No. 7-19 to operate two cremation incinerators.

EUBLP500 is a single-chamber cremation incinerator, which consists of a single primary combustion chamber followed by a single secondary combustion chamber control device. BLP-500M3 is a three-chamber cremation incinerator, which consists of three primary combustion chambers whose emissions are controlled by a single secondary combustion chamber. The EUBLP500 and the BLP-500M3 are natural gas-fired, each with a maximum charge limit of 500 Pounds and a burn rate limit of 150 Pounds/Hour.

The permittee is restricted to burning pathological wastes as follows:

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 emission unit shall burn only ANIMAL pathological waste and associated materials.

I entered the facility and met with Dr. Matthew Capitanio, Chief Executive Officer; and Richard Siemion, Director of Operations. Also present during portions of this inspection was Mr. Jeff Piasecki, Cremation Oven Operator. Dr. Capitanio, Mr. Siemion, and I held an opening meeting in which we discussed the purpose of the inspection. Dr. Capitanio escorted me throughout the inspection and provided records.

Both cremation incinerators occupy a shared space without physical dividers. EUBLP500 is the west incinerator and EUBLP500M3 is the east incinerator.

EUBLP500M3 is unusual because it is constructed with three charge doors; the largest chamber faces south, with the two remaining chambers facing east and west.

NOTE: The following paragraph provides graphic details of the cremation process that some readers may find disturbing. This is a reference for subsequent inspections. This paragraph does not appear to identify a violation and may be skipped.

Upon observing the incinerators, I immediately commented that there were unusually large deposits of soot on each charge door of each cremation incinerator and was concerned that the soot deposits indicated one or more cremations had burned out of control. Dr. Capitanio and I discussed the soot deposits with Mr. Piasecki, Cremation Oven Operator. Mr. Piasecki told us that when charging the primary combustion chamber for a group cremation the residual heat in the primary combustion chamber can ignite the fur on the first animal before the last animal is inserted; and the charge door is closed. Mr. Piasecki stated that smoke from initial fur combustion created the soot deposits I observed. During the records review, I observed that the secondary combustion chamber temperature was consistently at 1600 F. This is relevant because when a cremation burns out of control the secondary combustion chamber temperature can rise to 2000 F or higher. This activity does not appear to violate EUBLP500 and BLP-500M3 III.2, which states in part, "The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions…" The soot deposits do not appear to indicate a violation, but my determination is subject to review.

Dr. Capitanio and I discussed the loading procedure PACE uses when charging EUBLP500M3. Dr. Capitanio stated that all three primary chambers are charged at one time and then all three charges are fully cremated before starting a new batch. The permittee does not appear to operate the triple-chamber incinerator as a continuous process.

Dr. Capitanio and I walked outside the building to determine if we could see one or both exhaust stacks. The exhaust stacks were not visible from any ground-level position we could access. Therefore, I could not conduct a valid Method 9 visible emission observation.

Per my request, Dr. Capitanio saved an animal for cremation. I observed the deceased animal inserted in the primary combustion chamber. I immediately walked outside and took a position south of the building. Dr. Capitanio joined me. We observed a few short bursts of opacity during the first five minutes. Each opacity event lasted about 30 seconds and the opacity varied from about 15 to 25 percent. The amount and duration of opacity I observed were similar to other crematories I've observed. I could not conduct a valid Method 9 visible emission observation reading because I could not see the exhaust stack.

RECORDKEEPING
The records provided appeared to satisfy the daily recordkeeping requirements regarding the description and weight of each charge but some temperature chart records failed to demonstrate compliance.

EUBLP500

As required per VI.2 and VI.5, the permittee failed to keep, in a manner satisfactory to the AQD District Supervisor, secondary combustion chamber temperature records. Specifically, 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. These noncompliances shall be cited in a violation notice.

EUBLP500M3
As required per VI.2 and VI.5, the permittee failed to keep, in a manner satisfactory to the AQD District Supervisor, secondary combustion chamber temperature records. Specifically, 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. Additionally, 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. These noncompliances shall be cited in a violation notice.

CONCLUSION
Pet and Animal Cremation Exchange appears to be in violation of the recordkeeping requirements of VI.2 and VI.5 of EUBLP500 and EUBLP500M3 for failing to keep records in a manner satisfactory to the AQD District Supervisor, of the temperature in the secondary combustion chamber on a continuous basis. These noncompliances shall be cited in a violation notice.

NAME Robert Ulmarchi DATE August 31, 2020 SUPERVISOR Joyce St