



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 16, 2022

VIA E-MAIL AND U.S. MAIL

Daren A. Krause, Owner/President
Krause Veterinary Clinic
72025 North Avenue
Armada, MI 48005-3929

SRN: P1160, Macomb County

Dear Daren A. Krause:

VIOLATION NOTICE

On August 11, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Krause Veterinary Clinic located at 72025 North Avenue, Armada, Michigan. The purpose of this inspection was to determine Krause Veterinary Clinic'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) number 11-21.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCREMATORY1	PTI No. 11-21, EUCREMATORY1, II.2	The permittee charged more than the allowed permit limit of 300 pounds.
EUCREMATORY1	PTI No. 11-21, EUCREMATORY1, VI.3	The permittee failed to keep, in a satisfactory manner, daily records of the time (duration of burn), description, and weight of the charge combusted in EUCREMATORY1, as required by PTI No. 11-21, EUCREMATORY1, SC II.2.
EUCREMATORY1	PTI No. 11-21, EUCREMATORY1, VI.5	The permittee failed to keep, in a manner satisfactory to the AQD District Supervisor, secondary combustion chamber temperature records for EUCREMATORY1, as required by PTI No. 11-21, SC VI.2.

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During this inspection, Krause Veterinary Clinic informed staff that the permitted charge limit of 300 pounds per charge had been exceeded. The exact date and weight are unknown due to non-compliant recordkeeping, which is cited below. This constitutes a violation of PTI No. 11-21, EUCREMATORY1, II.2 which states, "The permittee shall not charge more than 300 pounds per charge in EUCREMATORY1, where charge is the total weight of the material placed in the incinerator to be combusted."

During this inspection, Krause Veterinary Clinic was unable to produce daily records of the time (duration of burn), description, and weight of the charge combusted in EUCREMATORY1. This constitutes a violation of PTI No. 11-21, EUCREMATORY1, VI.3, which states, "The permittee shall keep, in a satisfactory manner, daily records of the time (duration of burn), description and weight of the charge combusted in EUCREMATORY1, as required by SC II.2. The permittee shall keep all records on file and make them available to the Department upon request."

During this inspection, staff determined that Krause Veterinary Clinic failed to record, in a satisfactory manner, the temperature in the secondary combustion chamber of EUCREMATORY1 on a continuous basis because the records of multiple cremations overlapped. This constitutes a violation of PTI No. 11-21, EUCREMATORY1, VI.5, which states in part, "The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, secondary combustion chamber temperature records for EUCREMATORY1, as required by SC VI.2."

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 6, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Warren District, at 27700, Warren, Michigan 48092-2793 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Krause Veterinary Clinic believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Krause Veterinary Clinic. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

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Sincerely,



Robert Elmouchi
Senior Environmental Quality Analyst
Air Quality Division
586-854-3244

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE