

P1210  
MAVILS

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

P121069114

FACILITY: Ascension Reflection Cremation Services, Inc.		SRN / ID: P1210
LOCATION: 37105 Industrial Road, LIVONIA		DISTRICT: Detroit
CITY: LIVONIA		COUNTY: WAYNE
CONTACT: Peggy Finnigan , Owner		ACTIVITY DATE: 09/21/2023
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : 9/21/2023  
 TIME OF INSPECTION : 10:30 am  
 INSPECTED BY : Jill Zimmerman  
 PERSONNEL PRESENT : Peggy Finnigan, Owner  
 FACILITY PHONE NUMBER : 734-855-4523  
 FACILITY EMAIL : Peggy@arcservice.net

### FACILITY BACKGROUND

Arc Services currently operates three cremation units in an industrial park near the intersection of Industrial Road and Newburgh Road in Livonia, Michigan. Operations at this location began about April 2022. Currently the facility operates about six to eight hours a day, six days a week or as needed based on customer demand.

### COMPLAINT/COMPLIANCE HISTORY

Opacity complaints were received on October 20, 2022, October 25, 2022, October 26, 2022, October 27, 2022, and May 4, 2023. Opacity surveillance was performed on October 25, 2022, December 2, 2022, December 6, 2022, and May 4, 2023. During the surveillance, puffs of smoke were observed, though nothing that would exceed a 6-minute average of 20% opacity.

### PROCESS EQUIPMENT AND CONTROLS

This facility currently operates three cremation units. The units can handle a charge of up to 750 pounds. There is a continuous temperature recorder on each unit for the secondary chamber, and the temperature data is also collected electronically. There is a scale onsite, which is used to weigh each charge before the cremation begins. The units are fueled by natural gas.

### INSPECTION NARRATIVE

I arrived at the site around 10:30 am, to initially perform smoke surveillance. I parked south of the facility to observe the stacks. Three stacks were seen on the roof. No opacity was observed during the surveillance.

Next, I entered the facility, and met Ms. Peggy Finnigan, the owner of this facility. Ms. Finnigan explained that since the third unit was installed, no changes had been made to the facility. The second unit was not currently operating during my visit since the electronic panel was being updated.

Ms. Finnigan and I then walked through the facility. Two unit was operating during the onsite inspection. The secondary unit for unit 1 was operating at 1609 F. The secondary unit for unit 3 was operating at 1657 F. There was a temperature recorder located on each of the three units. There is a chilled room for storage located near the unit. The facility also maintains a viewing area for families that wish to view the cremation.

#### **APPLICABLE RULES/PERMIT CONDITIONS**

The facility is currently operating under PTI 55-21A, which was issued on July 7, 2022, when it was modified to add the third unit.

#### **EUCREMATORY1**

##### **I. Emission Limits:**

1. Compliance – The PM emissions are limited to 0.20 lbs. / 1000 lbs. exhaust. I did not observe any additional puffs of opacity.

##### **I. Material Limits**

1. Compliance – Only human remains are burned in the unit.
2. Compliance – The unit is not capable of handling charges greater than 750 lbs. Ms. Finnigan stated that the average charge is less than 300 lbs.
3. Compliance – The unit only operates on natural gas.

##### **I. Process/Operational Restrictions**

1. Compliance – During the onsite inspection, the secondary chamber temperature was 1609 F. Review of the chart recorder showed that while the unit is operating the secondary chamber remains above 1600 F.
2. Compliance – This unit appeared to be properly maintained.

##### **I. Design/Equipment Parameters**

1. Compliance – The secondary chamber with afterburner was installed and appeared to be operating properly during the onsite inspection.
2. Compliance – A temperature monitoring and recording device is installed on the unit. The temperature data is also stored electronically with the manufacturer.
3. Compliance – A scale is kept onsite to weigh the charges.

#### I. Testing/Sampling

1. NA – Testing has not been requested at this time.

#### I. Monitoring/Recordkeeping

1. Compliance – All records are maintained in an acceptable manner.
2. Compliance – The temperature in the secondary chamber is continuously recorded on a chart recorder located on the unit. It is also stored electronically.
3. Compliance – A form is completed for each charge which includes a description of the charge, the start and end of each burn, and the weight. One copy of this form is sent to the funeral home with the remains. A second copy remains onsite on file. This file was reviewed onsite during the inspection.
4. Compliance – Quarterly records are maintained onsite.
5. Compliance – A chart recorder for the temperature in the secondary chamber are maintained onsite and this file was reviewed during the onsite inspection. This data is also stored electronically.
6. Unknown – The equipment was recently installed. Service has not been required on this unit.

#### I. Reporting

1. NA

#### I. Stack / Vent Restrictions

1. Compliance – The facility has not modified any of the stacks since the installation at the proper height.

#### I. Other Requirements

1. NA

#### EUCREMATORY2

#### I. Emission Limits

1. Compliance – The PM emissions are limited to 0.20 lbs. / 1000 lbs. exhaust. This unit was not operating during the onsite inspection. Therefore, there was no exhaust to observe.

### I. Material Limits

1. Compliance – Only human remains are burned in the unit.
2. Compliance – The unit is not capable of handling charges greater than 750 lbs. Ms. Finnigan stated that the average charge is less than 300 lbs.
3. Compliance – The unit only operates on natural gas.

### I. Process/Operational Restrictions

1. Compliance –Review of the chart recorder showed that while the unit is operating the secondary chamber remains above 1600 F. This unit was not operating during the onsite inspection, so no temperature was being recorded.
2. Compliance – Ms. Finnigan said that proper maintenance is performed on the units as needed. The units are swept out after each burn.

### I. Design/Equipment Parameters

1. Compliance – The secondary chamber with afterburner was installed and appeared to be operating properly during the onsite inspection.
2. Compliance – A temperature monitoring and recording device is installed on the unit. The temperature data is also stored electronically with the manufacturer.

### I. Testing/Sampling

1. NA – Testing has not been requested at this time.

### I. Monitoring/Recordkeeping

1. Compliance – All records are maintained in an acceptable manner.
2. Compliance – The temperature in the secondary chamber is continuously recorded on a chart recorder located on the unit. It is also stored electronically.
3. Compliance – A form is completed for each charge which includes a description of the charge, the start and end of each burn, and the weight. One copy of this form is sent to the funeral home with the remains. A second copy remains onsite on file. This file was reviewed onsite during the inspection.
4. Compliance – Quarterly records are properly maintained onsite.
5. Compliance – A chart recorder for the temperature in the secondary chamber is maintained onsite and this file was reviewed during the onsite inspection. This data is also stored electronically.
6. Unknown –Service has not been required on this unit.

### I. Reporting

1. NA

### I. Stack / Vent Restrictions

1. Compliance – The facility has not modified any of the stacks since the installation at the proper height.

### I. Other Requirements

1. NA

## EUCREMATORY3

### I. Emission Limits

1. Compliance – The PM emissions are limited to 0.20 lbs. / 1000 lbs. exhaust. No VE's were observed during the onsite inspection.

### I. Material Limits

1. Compliance – Only human remains are burned in the unit.
2. Compliance – The unit is not capable of handling charges greater than 750 lbs. Ms. Finnigan stated that the average charge is less than 300 lbs.
3. Compliance – The unit only operates on natural gas.

### I. Process/Operational Restrictions

1. Compliance – Review of the chart recorder showed that while the unit is operating the secondary chamber remains above 1600 F. This unit was operating at 1657 F during the onsite inspection.
2. Compliance – Ms. Finnigan said that proper maintenance is performed on the units as needed. The units are swept out after each burn.

### I. Design/Equipment Parameters

1. Compliance – The secondary chamber with afterburner was installed and appeared to be operating properly during the onsite inspection.
2. Compliance – A temperature monitoring and recording device is installed on the unit. The temperature data is also stored electronically with the manufacturer.

### I. Testing/Sampling

1. NA – Testing has not been requested at this time.

### I. Monitoring/Recordkeeping

- 1. Compliance – All records are maintained in an acceptable manner.
- 2. Compliance – The temperature in the secondary chamber is continuously recorded on a chart recorder located on the unit. It is also stored electronically.
- 3. Compliance – A form is completed for each charge which includes a description of the charge, the start and end of each burn, and the weight. One copy of this form is sent to the funeral home with the remains. A second copy remains onsite on file. This file was reviewed onsite during the inspection.
- 4. Compliance – Proper quarterly records are maintained onsite.
- 5. Compliance – A chart recorder for the temperature in the secondary chamber are maintained onsite and this file was reviewed during the onsite inspection. This data is also stored electronically.
- 6. Unknown – Service has not been required on this unit.

1. Reporting

- 1. NA

1. Stack / Vent Restrictions

- 1. Compliance – The facility has not modified any of the stacks since the installation at the proper height.

1. Other Requirements

- 1. NA

**MAERS REPORT REVIEW**

**This facility is not required to submit MAERS at this time.**

**FINAL COMPLIANCE DETERMINATION**

**ARC Services appears to be operating in compliance with the current permit conditions as well as all state and federal regulations.**

NAME 

DATE 7/22/24

SUPERVISOR 