

February 5, 2024

Adam Bognar EGLE, AQD Warren District 27700 Donald Court Warren, Michigan 48092

Dear Adam,

RE: P1245 Oakand County

In response to a Violation Notice dated January 23, 2024, please find our responses below.

- EUCREMATORY 9 Rule 910 Violation
 - This occurred on two separate occasions that we can identify via charts and was operator error. Operators in question of have been retrained and other operators reminded of required operating procedure to avoid this issue.
- No Scale Present
 - Multiple scales have been purchased and placed within ready access of the equipment to allow for weights to be recorded accurately.
- Two Laser Engraving Units operating without permits to install
 - Following extensive discussions with yourself and in turn, the manufacturer of the units, it was determined that per Rule 290, they are exempt from permitting.
 Supporting materials included.

Please advise if there is anything further that you require. Our team is committed to working within the confines of our permit and the team is continuously reminded of this commitment.

Regards,

Thomas E. Rood

Chief Operating Officer

Cc: Jenine Camilleri, Enforcement Unit Supervisor

EGLE, AQD P.O. Box 30260

Lansing, Michigan 48909-7760

Product Qty	
Urns per year	14500

Density (lb./Cubic Inch)	Total	
Cedar	0.017	

Engraved Volume (Cubic Inch)	Height	Width	Depth	Text Modifier	Total
2 2200 K William Coll C	1	3	0.02	0.45	0.027

Particulate Volume (Cubic Inch)	Total
	0.027

Particulate Weight (lb.)	Density	Volume	Total
	0.017	0.027	0.000459

Total Annual Weight (lb./year)	Product qty	Weight	Total
	14500	0.000459	6.6555



DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

WARREN DISTRICT OFFICE



January 23, 2024

Thomas E. Rood, Chief Operating Officer Faithful Companion Memorials, Inc. 1909 Thunderbird Street Troy, Michigan 48084

SRN: P1245, Oakland County

Dear Thomas Rood:

VIOLATION NOTICE

On January 10, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Faithful Companion Memorials located at 1909 Thunderbird Street, Troy, Michigan. The purpose of this inspection was to determine Faithful Companion Memorial'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 19-22A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCREMATORY9	PTI No. 19-22A EUCREMATORY9 III.1 and IV.1	Continuous temperature records indicate that this emission unit was operated while the secondary
	Rule 910	combustion chamber was below 1600°F
EUCREMATORY1 EUCREMATORY9 EUCREMATORY11 FGIEB16	PTI No. 19-22A EUCREMATORY1 IV.3 EUCREMATORY9 IV.3	Facility did not maintain a scale on-site for purposes of weighing each charge.
	EUCREMATORY11 IV.3 FGIEB16 IV.3	58 5000 A 100
Two Laser Engraving Units	Rule 201	Facility operated two laser engraving processes without a permit to install.

During this inspection, it was noted that Faithful Companion Memorials, Inc. had installed and commenced operation of an unpermitted laser engraving process at this facility. The AQD staff advised Faithful Companion Memorials, Inc. on January 22, 2024, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

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A program for compliance may include a completed PTI application for the Laser Engraving process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 13, 2024 (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 Adam Bognar at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 or bognara1@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Faithful Companion Memorials, LLC 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 Faithful Companion Memorials, LLC. 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.

Sincerely.

Adam Bognar

Senior Environmental Engineer

Air Quality Division

586-854-1517

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE
Kerry Kelly, EGLE