



GRETCHEN WHITMER
GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

January 6, 2023

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

SRN: P1245, Oakland County

Dear Thomas E. Rood:

VIOLATION NOTICE

On December 13, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Faithful Companion Memorials, Inc. located at 1909 Thunderbird Street, Troy, Michigan. The purpose of this inspection was to determine Faithful Companion Memorials' 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 19-22.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCREMATORY2	R 336.1910	Temperature records indicate that this emission unit was routinely operated while the secondary combustion chamber was operating between 1200 and 1500 degrees Fahrenheit, which is below the AQD's minimum permitting temperature of 1600 degrees Fahrenheit. Failing to maintain a minimum operating temperature of 1600 degrees F constitutes unsatisfactory operation of the air-cleaning device.
EUCREMATORY6	PTI 19-22, FGIEB16, VI.2.	On December 13, 2022, staff observed that the permittee failed to replace the ink pen on the temperature chart recorder, which resulted in faint illegible recordkeeping.

EUCREMATORY9	PTI 19-22, EUCREMATORY9, III.1, III.2, IV.1, and R 336.1910.	Temperature chart records indicate that on December 9, 2022, the permittee failed to maintain a minimum temperature of 1600 degrees Fahrenheit while combusting waste in EUCREMATORY9. Temperature chart records indicate the temperature repeatedly dropped to 1300 degrees F.
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During the inspection, staff observed from the temperature chart that EUCREMATORY2 emission unit was routinely operated while the secondary combustion chamber was operating between 1200 and 1500 degrees Fahrenheit, which is below the AQD's minimum permitting temperature of 1600 degrees Fahrenheit. Failing to maintain a minimum operating temperature of 1600 degrees F constitutes unsatisfactory operation of the air-cleaning device in violation of R 336.1910, which states, *"An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law."*

During the inspection, staff observed that the permittee failed to replace the ink pen on the EUCREMATORY6 temperature chart recorder, which resulted in faint illegible recordkeeping. This constitutes a violation of PTI 19-22, FGIEB16, VI.2, which states, *"The permittee shall monitor and record the temperature in the secondary combustion chamber in each unit of FGIEB16 on a continuous basis."*

During the inspection, according to the temperature chart, staff observed that on December 9, 2022, the permittee failed to maintain a minimum temperature of 1600 degrees Fahrenheit in the secondary combustion chamber while combusting waste in EUCREMATORY9. The temperature chart records indicate the temperature repeatedly dropped to 1300 degrees F. This constitutes a violation of PTI 19-22, EUCREMATORY9, III.1, which states, *"The permittee shall not combust waste in EUCREMATORY9 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 second in the secondary combustion chamber are maintained."*

Failing to maintain a minimum temperature of 1600 degrees F also constitutes a violation of PTI 19-22, EUCREMATORY9, III.2, which states in part, *"The incinerator shall be installed, maintained, and operated in a manner satisfactory to the AQD District Supervisor to control emissions from EUCREMATORY9."*

Failing to maintain a minimum temperature of 1600 degrees F also constitutes a violation of PTI 19-22, EUCREMATORY9, IV.1, which states, *"The permittee shall not operate EUCREMATORY9 unless the secondary combustion chamber with afterburner is installed, maintained, and operated in a manner satisfactory to the AQD District Supervisor."*

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Failing to maintain a minimum temperature of 1600 degrees F also constitutes a violation of R 336.1910, which states, "*An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.*"

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 27, 2023, (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 Donald Court, Warren, Michigan 48092 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, Inc. 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, Inc. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact Adam Bognar at 586-854-1517 or bognara1@michigan.gov or Joyce Zhu, District Supervisor, at 586-606-2572 or zhuj@michigan.gov.

Sincerely,



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

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE
Adam Bognar, EGLE