



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

December 18, 2023

Drew Cushingberry
Transitions Pet Memorial Services
12379 31 Mile Road
Washington, MI 48095

SRN: P0230, Macomb County

Dear Drew Cushingberry:

VIOLATION NOTICE

On December 13, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Transitions Pet Memorial Services located at 12379 31 Mile Road, Washington, Michigan in response of a complaint received. The purpose of this inspection was to determine Transitions Pet Memorial Services' 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 to investigate a recent complaint which we received on December 7, 2023, regarding black smoke and foul odors attributed to Transitions Pet Memorial Services operations.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|--|--------------------------------|--|
| Black smoke visible from stack. | R336.1301 | Significant opacity observed over a six-minute interval. |
| Incinerator operating without permit-to-install (PTI). | R336.1201(1)(a) | According to owner, the facility has been operating at location for approximately 10 years without a PTI. |
| Afterburner (control) not working properly on incinerator. | R336.1910 | Black smoke was observed coming from the stack over an extended period of time indicating a malfunction of the control device. |

During this inspection, it was noted that Transitions Pet Memorial Services had installed and commenced operation of an unpermitted equipment at this facility. The AQD staff advised Transitions Pet Memorial Services on December 13, 2023, 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 pet crematory incinerator 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.

VISIBLE EMISSIONS

During this inspection it was noted that Transitions Pet Memorial Services pet crematory incinerator process was emitting opacity in excess of emissions allowed by Rule 301 of the administrative rules promulgated under Act 451.

On December 13, 2023, staff observed a significant opacity over 27% for a six-minute period, which is a violation of Rule 301.

RULE 910: AIR CLEANING DEVICES

On December 13, 2023, the AQD staff observed operation of pet crematory incinerator while the afterburner was malfunctioning.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 8, 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 be aware Marie Reid is the current inspector assigned to this facility. Please submit the written response to Marie Reid at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 or reidm5@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Transitions Pet Memorial Services 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Transitions Pet Memorial Services. 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,

A handwritten signature in black ink, appearing to read 'Mark Dziadosz', written in a cursive style.

Mark Dziadosz
Senior Environmental Quality Analyst
Air Quality Division
586-854-1611

cc: Marvin Cushingberry, Transitions Pet Memorial Services
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE
Marie Reid, EGLE