

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

P140171073

FACILITY: Paws in Time Pet Cremation		SRN / ID: P1401
LOCATION: N10406 VANDERHAGEN ROAD, IRONWOOD		DISTRICT: Marquette
CITY: IRONWOOD		COUNTY: GOGEBIC
CONTACT: Jessica Tippet , Owner		ACTIVITY DATE: 03/01/2024
STAFF: Joe Scanlan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced inspection to determine compliance with PTI No. 115-23 and follow-up on odor/opacity complaint.		
RESOLVED COMPLAINTS: C-24-00681		

REGULATORY AUTHORITY

Under the Authority of Section 5526 of Part 55 of NREPA, the Department of Environment, Great Lakes, and Energy may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.

FACILITY DESCRIPTION

Paws in Time Pet Cremation operates a single Matthews Cremation Division IE43-PPJ Power Pak Jr. Crematory Incinerator as a pet cremation unit. The incinerator is a propane gas fired unit with a maximum capacity of 300 lbs at a burn rate of 75 lbs/hour.

This incinerator unit was previously installed at a different location in Gogebic County, in Ramsey, and operated under Permit to Install (PTI) No. 334-08 as Rivers Edge Pet Crematory. This business was closed, and the incinerator unit was sold and moved to its current location a few miles away at N10406 Vanderhagen Road, Ironwood, Gogebic County, Michigan. PTI No. 334-08 was voided, and PTI No. 115-23 was issued to the new owners at the new location.

PROCESS DESCRIPTION

Natural gas fired crematories and incinerators that combust pet remains. Incinerators used for cremation purposes are called "retorts" and the remains are referred to as "charges". Incinerators typically have a primary burner in the main chamber and a secondary burner/afterburner in the flue stack.

EMISSIONS

Natural gas fired crematories and incinerators that combust human remains, animal remains, refuse, agricultural products, or medical waste are sources of carbon monoxide (CO), nitrogen oxides (NOx), particulate matter (PM), volatile organic compounds (VOCs), sulfur oxides (SOx) and trace toxic substances. Emissions of trace toxic substances may include hydrogen chloride, formaldehyde, benzene, toluene, mercury, hexavalent chromium, PAH's, and other organic gases or heavy metals. Emissions from these processes are highly dependent upon equipment type, control devices, operating conditions, fuel type, process time, charge material composition and operator experience.

EMISSIONS REPORTING

The facility is not required to report to MAERS.

COMPLIANCE HISTORY

This incineration unit has previously been inspected at its former location and was found to be following all applicable air quality rules and federal regulations at that time. The unit has not previously been inspected at this new location.

REGULATORY STATUS

The facility is a true minor source and operates under PTI No. 115-23.

INSPECTION

On March 1, 2024, AQD Staff Joseph Scanlan and Drew Yesmunt conducted a targeted inspection on Paws in Time Pet Cremation. This inspection was also a follow-up to a complaint received for opacity and odors on February 20, 2024. AQD Staff arrived at the facility and met with Jessica and Keith Tippett, operators and owners. It was explained that the purpose of the inspection was to ensure compliance with PTI No. 115-23 and all other state air pollution control rules and federal regulations. Operations, on-site equipment, and records were discussed, and a walkthrough of the process and equipment was provided. The crematory unit was not operating at the time of inspection.

EUCREMATORY1

Emission Limits

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.20 pounds per 1,000 pounds of exhaust gases (calculated to 50% excess air)	Hourly	EUCREMATORY1	SC V.1	R 336.1331

The facility shows compliance with the PM limit through proper temperature of the secondary combustion chamber and maintaining 0% opacity from the stack while operating. Compliance with this limit is also demonstrated through “upon request” performance testing. No visible emissions were observed due to the unit not operating at the time of inspection.

Material Limits

SC II.1-3 The facility only incinerates animal pathological waste in EUUCREMATORY1, and typically limits the charge weight to 100-200 lbs maximum which is below the permit limit of 300

lbs. The permit states the facility is only allowed to burn propane gas in EUCREMATORY1. A propane tank is located adjacent to the building with fuel supply lines leading directly to the crematory unit.

Process/Operational Restrictions

SC III.1-2 The facility is required to maintain a minimum temperature of 1600°F and a minimum retention time of 1.0 seconds in the secondary combustion chamber. Temperature readings reviewed from the circular recorder charts showed operating temperatures between 1650- and 1675-degrees Fahrenheit when the unit was loaded with a charge. The temperature is monitored on a continuous basis while EUCREMATORY1 is operating.

Design/Equipment

SC IV.1-3 EUCREMATORY1 is operated with the secondary combustion chamber installed. The unit appears to be operating correctly based on temperature chart graphs. The facility uses a scale located near the crematory unit to verify the weight of the charges.

Testing/Sampling

SC V.1 Performance testing is at the discretion of the AQD District Supervisor.

Monitoring/Recordkeeping

SC VI.1-6 The facility provided records from the first date of the start of operation through February 29, 2024. Date, weight, type of charge, and time and duration of cremation are recorded. Secondary combustion chamber temperature is recorded separately on a circular temperature chart graph. Because the unit was just installed, there are no maintenance records at this time.

Stack/Vent Restriction

The stack was easily visible from the ground and is unobstructed. A rangefinder was not utilized, however the stack appeared to be no larger than 15" in diameter and no less than 18' above grade.

CONCLUSION

Based on this inspection, it appears Paws In Time Pet Cremation is in compliance with PTI No. 115-23 and all other state air pollution control rules and federal regulations. It was conveyed to the facility that no violations were observed during the on-site inspection, and the anonymous complaint received by AQD on February 20, 2024, is considered resolved at this time.



Image 1(PIT1) : Propane tank, fuel supply line, and stack



Image 2(PIT2) : Matthews Cremation Division IE43-PPJ Power Pak Jr. Crematory Incinerator

Paws in Time Pet Crematory

Date	Animal Name	Species	Weight	Time on	Time off	Animal id#
12/4		K9	90#	215	630	
12/5		K9/feline	75#	300	730	
12/8		K9	97#	200	630	
12/11		K9	105#	235	730	
12/13		K9	110#	230	643	
12/14		K9	37#	215	600	
12/15		K9	120#	225	655	
12/22		K9	90#	135	655	
12/23		K9/feline	162#	1000	138	
12/27		K9	78#	205	632	
12/28		K9	128#	1005	300	
1/6		K9/feline	118#	200	700	
1/10		K9	89#	230	830	
1/12		K9/feline	120#	200	800	
1/16		K9/feline	79#	200	830	
1/25		K9	130#	100	530	
2/10		K9/feline	59#	922	230	
2/18		K9	47#	400	800	
2/19		K9/feline	67#	1010	1250	
2/25		K9	118#	810	1230	
2/27		K9	111.2#	300	615	
2/29		K9/feline	69#	230	543	

Image 3(PIT3) : Dates, type of charge, weight of charge, and time/duration of cremation.

NAME Joseph S. S. S.

DATE 5-3-2024

SUPERVISOR Michael Kaplan