

Resolution of Violation Notice

This letter is in response to the Violation Notice issued to Transitions Pet Memorial LLC by the Department of Environment, Great Lakes and Energy (EGLE) on December 13, 2023. In reference to the notice we received we were cited on Rules **R336.1301**, **R336.1201(1)(a)** and **R336.1910**. These violations are acknowledged and no longer ongoing, our Incinerator has been inspected and calibrated to be in compliance with all local, state and federal air quality rules and regulations. As well as we are in the process of submitting the PTI (Permit-to-Install) application form for the pet crematory incinerator. Transitions has been in contact with the AQD Staff since being made aware of the violations to make sure we are in compliance, supplying information and receiving help with the PTI application process. During the inspection, the cause of the visible black smoke is believed to be from an oversized charge load. Since then, on *January 3, 2024* Transitions Pet Memorial LLC conducted the necessary maintenance on the incinerator, and secondary burner (after burner) temperature controls were inspected and calibrated to the correct temperature levels. The secondary burner (after burner) is properly running and will not malfunction, nor cause problematic visible smoke opacity which was noted on the inspection date. Our unit was manufactured and installed by Pennram Diversified Manufacturing Corporation. Every incinerator and crematory supplied by Pennram is designed and manufactured according to its specific application and is in full compliance with government environmental and safety regulations. This tailor-made engineering approach is to ensure the incinerator meets the exact needs of each customer. Pennram incinerators and crematory systems have demonstrated high system performance with:

- Accurate control of secondary chamber temperature to assure complete destruction of organic and other harmful substances in the off-gas.
- Achieved particulate concentration in incinerator off-gas as low as 0.013 gr/dscf (29mg/Nm²) corrected to 7% oxygen before going into the air pollution system. The average opacity is less than 1%, which is not visible
- Achieved up to 99.95% reduction of waste by weight.

The high performance of the Pennram incinerators and crematory systems is achieved by good engineering design of each equipment component, quality construction, practical control logic and full monitoring instrumentation provided as an integral part of the unit. The air-tight construction of the incinerator chambers and the automatic loader minimizes in-leakage, eliminating the major cause of low incinerator performance.

Pennram incinerators and crematory systems are provided with complete safety interlocks, including electronic flame supervision, start-up and shutdown system purge, loader operation, safety interlocks and alarms, primary and secondary chamber high/low temperature alarms, system fan operation interlocks, and emergency dump of off-gas to assure operator's safety as well as to avoid damage to the incinerator and the air pollution control system under normal operating conditions.

Transitions Pet Memorial LLC will not conduct oversized charge loads, and implementing more routine maintenance to prevent any problems from reoccurring in the future to continue to be in compliance with the EGLE.

Our best regards,

Transitions Pet Memorial LLC

