

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N583952110

FACILITY: Myrtle Park Crematorium		SRN / ID: N5839
LOCATION: 9619 NORTHLAND DR NE, ROCKFORD		DISTRICT: Grand Rapids
CITY: ROCKFORD		COUNTY: KENT
CONTACT: William Burke , President		ACTIVITY DATE: 01/14/2020
STAFF: Adam Shaffer	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled unannounced inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the Myrtle Park Crematorium (MC) site located in Rockford, MI at 10:08 am on January 14, 2020 to complete a scheduled unannounced inspection.

Facility Description

MC is a crematorium and is in operation with Permit to Install (PTI) No. 155-96B for three incinerators.

Compliance Evaluation

Prior to entering the facility, offsite odor and visible emission observations were completed. The weather conditions at the time of the inspection were cloudy skies, temperatures in the low 30's°F, and winds from the south at 5-10 mph. All three incinerators were noted to be in operation based on heat distortions coming from the three stacks observed. No emissions were observed. What appeared to be a burning odor was noted further to the north of the facility. No recent odor complaints have been received regarding this facility from the surrounding area.

Upon entering the site, AQD staff AS met with Mr. Job Murphy, Operator, who provided a tour of the facility, answered site specific questions and provided requested records following the inspection.

PTI No. 155-96B

MC has in operation three incinerators under PTI No. 155-96B. Additional information for each incinerator is described below.

EU-Incinerator1 - Matthews Cremation System IE43 Power-Pak II crematory, natural gas fired.

EU-Incinerator2 - Matthews Cremation System IE43 Power-Pak II crematory, natural gas fired.

EU-Incinerator3 - Matthews Cremation System IE43 Super Power-Pak III crematory, natural gas fired.

In June 2019, MC staff stated that EU-Incinerator3 had been completely rebuilt, which included replacement of pipes, afterburner, brick, insulation, floor and ceiling. This would all be considered one project and records of the costs of the project and the costs of purchasing a new EU-Incinerator3 were requested and provided. In order for this project to be exempt from Rule 201 permitting under Rule 285(2)(b), the cost of the project compared to the cost of purchasing a new EU-Incinerator3 cannot exceed 50%. Based on the records provided the

project was 34% the amount of purchasing a new unit. Additionally, after speaking with MC staff, the project was determined to be replacement of parts for the incinerator in order to maintain satisfactory operation of the unit. The project would appear to not change the quality and nature of emissions nor increase the quantity of emissions. Based on the information provided and speaking with MC staff, the project does not appear to be a reconstruction and appears to be exempt from Rule 201 permitting under Rule 285(2)(b).

The three incinerators are subject to a particulate matter (PM) limit of 0.20 pounds of exhaust gases, corrected to 50% excess air per test protocol. Based on the observations made prior to arriving on site and during the site inspection, MC appears to be meeting this emission limit through satisfactory operation of each unit.

Per Special Condition (SC) 1.2, EU-Incinerator1&2 are limited to only burning Pathological and Type 0 wastes. Additionally, EU-Incinerator3 is only limited to burning Pathological wastes. While speaking with MC staff it was determined that they only burn human remains and the boxes / bags they are shipped in. This appears to be satisfactory.

Satisfactory operation of FG-Incinerators includes not combusting waste unless a minimum temperature of 1600°F and a minimum retention time of 1.0 seconds is being met for the secondary chamber. At the time of the inspection all three incinerators were in operation. MC staff stated the setpoints for all three incinerator afterburners are 1650°F. It was later clarified that during operation if the afterburner temperature hits about 1610°F, dampers are opened to allow more oxygen in and thus raise the temperature of the afterburner chamber. Additionally, if the afterburner chamber reaches slightly over 1650°F the afterburner will shut down to lower the temperature to the acceptable range. This appears to be acceptable. For EU-Incinerator3 the values are preset, while the remaining two incinerator settings need to be reset each burn. All three incinerators had display monitors showing the afterburner temperatures.

EU-Incinerator1 – At the time of the inspection the afterburner was running at 1609°F.

EU-Incinerator2 – At the time of the inspection the afterburner was running at 1612°F. A second chart was noted also reading temperatures but were slightly off from the first display monitor. This variation could have potentially been a calibration issue. Both monitors were above the 1600°F permitted limit. A circular chart recording device that is used to record the afterburner temperature when in operation was noted on this incinerator.

EU-Incinerator3 – At the time of the inspection the afterburner was running at 1648°F. A circular chart recording device that is used to record the afterburner temperature when in operation was noted on this incinerator.

While speaking with MC staff it was concluded that minor maintenance is completed by MC staff on site and major maintenance projects are completed by Matthews Environmental Solutions. Dates of the three major maintenance projects that have occurred while current MC staff were there were discussed at the time of the inspection. Based on the observations made at the time of the inspection all three incinerators appeared to be operating in a satisfactory manner.

Per SC 1.6 and 1.7, MC shall keep daily records of the description and weight of waste combusted, and temperature records of the afterburner for each incinerator. While speaking with MC staff it was determined that based on miscommunication between MC staff and Matthews Environmental Solutions staff, records had stopped being kept sometime around the start of 2019. Based on the lack of records this is a violation of PTI No. 155-96B, FG-Incinerators, SC 1.6 and 1.7. As previously stated, the circular recording devices used to

record the afterburner temperatures were noted on two of the incinerators but were not operating.

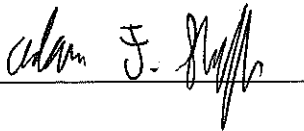
Three stacks are listed in association with FG-Incinerators and were observed during the site inspection. The stacks were noted to be discharging unobstructed vertically. MC staff stated that no changes have occurred to the stacks since the last inspection.

Conclusion

Based on the review of the records provided and observations made at the time of the inspection, MC is not in compliance with PTI No. 155-96B. A violation notice (VN) will be sent for the following violations.

- At the time of the inspection, MC had not been keeping track of daily records of the description and weight of waste combusted for each incinerator since around the start of 2019. This is a violation of PTI No. 155-96B, FG-Incinerators, SC 1.6.
- At the time of the inspection, MC had not been keeping track of afterburner temperature records for each incinerator since around the start of 2019. This is a violation of PTI No. 155-96B, FG-Incinerators, SC 1.7.

NAME



DATE

01/29/20

SUPERVISOR



