

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

WARREN DISTRICT OFFICE



SRN: N7548, Macomb County

July 17, 2023

Chris Gordon Detroit Wilbert Cremation Services, LLC 44481 N Groesbeck Highway Clinton Township, MI 48036

Dear Chris Gordon:

VIOLATION NOTICE

On June 15, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Detroit Wilbert Cremation Services located at 44481 N Groesbeck Highway, Clinton Township, Michigan. The purpose of this inspection was to determine Detroit Wilbert Cremation 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 the conditions of Permit to Install (PTI) numbers 23-22, 33-14, 151-06, 296-05A.

During the inspection, staff observed the following:

	Rule/Permit	
Process Description	Condition Violated	Comments
EUPETCREMATORY	PTI 151-06, EUPETCREMATORY, Special Condition 1.3, and 1.4.	The permittee combusted waste in EUPETCREMATORY below the minimum temperature of 1600°F in the secondary combustion chamber.
EUPETCREMATORY	PTI 151-06, EUPETCREMATORY, Special Condition 1.4, Appendix A, No. 7.	The permittee did not keep combustion air adjusted according to the manufacturer's instructions.

The permittee combusted waste in EUPETCREMATORY below the minimum temperature of 1600°F in the secondary combustion chamber. This constitutes a violation of PTI No. 151-06, EUPETCREMATORY, Special Condition 1.3, which states, "The permittee shall not combust waste in EUPETCREMATORY unless a minimum temperature of 1600°F and a minimum retention time of 1.0 seconds in the secondary combustion chamber are maintained." This also constitutes a violation of PTI No. 151-06, EUPETCREMATORY, Special Condition 1.4, which states, "The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from

Chris Gordon Detroit Wilbert Cremation Services, LLC Page 2 July 17, 2023

EUPETCREMATORY. A list of recommended operating and maintenance procedures is specified in Appendix A."

The permittee did not keep combustion air adjusted according to the manufacturer's instructions. This constitutes a violation of PTI No. 151-06, EUPETCREMATORY, Special Condition 1.4, Appendix A No. 7, which states, "Keep the combustion air adjusted according to the manufacturer's instructions."

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 7, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 Detroit Wilbert Cremation Services, LLC 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 violation cited above and for the cooperation that was extended to me during my inspection of Detroit Wilbert Cremation Services, LLC. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,

Marie Reid

Environmental Quality Analyst

Mon Ral

Air Quality Division

586-249-6505 | reidm5@michigan.gov

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