

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY LANSING DISTRICT OFFICE



KEITH CREAGH DIRECTOR

July 15, 2016

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Jeff Russell Green Oaks Pet Memorial Services 11096 Hi-Tech Drive Whitmore Lake, Michigan 48189

Dear Mr. Russell:

SRN: N7891, Livingston County

VIOLATION NOTICE

On July 12, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Green Oaks Pet Memorial Services (Green Oaks) located at 11096 Hi-Tech Drive, Whitmore Lake. The purpose of this inspection was to determine Green Oaks' 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 376-08 and 377-08.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Pet Incinerator	PTI 377-08 condition 2.5	Temperature recording device inoperative.
Pet Incinerator	PTI 377-08 condition 2.7	Operating temperature records unavailable.

During this inspection, Green Oaks was unable to produce temperature monitoring records due to an inoperative recording device. This is a violation of monitoring and recordkeeping specified in Special Conditions number 2.5 and 2.7 of PTI number 377-08.

Condition 2.5 of PTI number 377-08 requires the "permittee to install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the temperature in the secondary combustion chamber of EU-CREMATORY-2 on a continuous basis". The ink used to record the temperatures on a rotary chart had not been replaced once it was depleted.

Condition 2.7 of PTI number 377-08 requires "the permittee to keep in a satisfactory manner, secondary combustion chamber temperature records for EU-CREMATORY2 as required by SC 2.5. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request". Due to the ink not being replaced, these records were not produced to show past compliance and thus unavailable.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 4, 2016. 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.

If Green Oaks 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 violations cited above and for the cooperation that was extended to me during my inspection of Green Oaks. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,

Nathan Hude Environmental Quality Analyst Air Quality Division 517-284-6779

NNH:TG

cc/via e-mail: Ms. Lynn Fiedler, DEQ Ms. Teresa Seidel, DEQ Ms. Heidi Hollenbach, DEQ Mr. Thomas Hess, DEQ Mr. Brad Myott, DEQ