



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

September 7, 2022

VIA E-MAIL AND U.S. MAIL

Kenneth Allen Sr.
Alta Cremation and Services Inc.
21650 West Eleven Mile Road, Suite 207A
Southfield, MI 48076

SRN: P1145, Oakland County

Dear Kenneth Allen Sr.:

VIOLATION NOTICE

On August 31, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Alta Cremation and Services Inc. located at 13425 Capital Street, Oak Park, Michigan. The purpose of this inspection was to determine Alta Cremation and 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) number 115-20.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCREMATORY1	PTI No. 115-20, EUCREMATORY1, III.1, and R 336.1910.	From August 29 through August 31, 2022, EUCREMATORY1 was operated at 1575°F, which is 25°F less than the permitted minimum of 1600°F.
EUCREMATORY1	PTI No. 115-20, EUCREMATORY1, III.2.	A mechanical malfunction of the Primary Combustion Chamber (PCC) rear door causes it to occasionally open about a half inch, which requires the operator to manually close it again. The partially open PCC rear door introduces cooler air into the exhaust stream and may cause the Secondary Combustion Chamber temperature to drop below 1600°F. This may affect the proper operation of the control to the emissions from cremation system.

EUCREMATORY1	PTI No. 115-20, EUCREMATORY1, IV.2.	The permittee asserts that a temperature chart recorder calibration error has caused the recording of false low temperatures in the Secondary Combustion Chamber.
EUCREMATORY1	PTI No. 115-20, EUCREMATORY1, VI.3.	The permittee failed to record the duration of the burn of each cremation on all cremation logs. The permittee failed to record the date, and duration of the burn of each cremation on all temperature charts.

From August 29 through August 31, 2022, EUCREMATORY1 was operated at 1575 degrees Fahrenheit, which is 25 degrees less than the permitted minimum of 1600 degrees. This constitutes a violation of PTI No. 115-20, EUCREMATORY1, III.1, which states, *“The permittee shall not combust waste in EUCREMATORY1 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 second in the secondary combustion chamber are maintained.”* This also constitutes a violation of R 336.1910, which states, *“An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.”*

A mechanical malfunction of the Primary Combustion Chamber (PCC) rear door causes it to occasionally open about a half inch, which requires the operator to manually close it again. The partially open PCC rear door introduces cooler air into the exhaust stream and may cause the Secondary Combustion Chamber temperature to drop below 1600°F. This constitutes a violation of PTI No. 115-20, EUCREMATORY1, III.2, which states in part, *“The incinerator shall be installed, maintained, and operated in a manner satisfactory to the AQD District Supervisor to control emissions from EUCREMATORY1.”*

On August 31, 2022, the permittee asserted that a temperature chart recorder calibration error has caused the recording of false low temperatures in the Secondary Combustion Chamber. This constitutes a violation of PTI No. 115-20, EUCREMATORY1, IV.2, which states, *“The permittee shall install, calibrate, maintain, and operate in a manner satisfactory to the AQD District Supervisor, a device to monitor and record the temperature in the SCC of EUCREMATORY1 on a continuous basis.”*

Please be advised that a satisfactory resolution to this calibration error is to have the monitoring and recording device calibrated by a qualified technician and provide the service records to the AQD.

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The permittee failed to record the duration of the burn of each cremation on all cremation logs and failed to record the date and duration of the burn of each cremation on all temperature charts. This constitutes a violation of PTI No. 115-20, EUCREMATORY1, VI.3, which states in part, "*The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, daily records of the time (duration of burn), description and weight of the charge combusted in EUCREMATORY1, as required by SC II.2.*"

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 28, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the dates the violations occurred; an explanation of the causes and duration of the 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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092-2793, and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Alta Cremation and Services Inc. 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 Alta Cremation and Services Inc. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,



Robert Elmouchi
Senior Environmental Quality Analyst
Air Quality Division
586-854-3244; elmouchir@michigan.gov

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