

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

P116064014

FACILITY: KRAUSE VETERINARY CLINIC		SRN / ID: P1160
LOCATION: 72025 NORTH AVENUE, ARMADA		DISTRICT: Warren
CITY: ARMADA		COUNTY: MACOMB
CONTACT: Daren A. Krause , Owner/President		ACTIVITY DATE: 08/11/2022
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

On August 11, 2022, I conducted an unannounced inspection of the Krause Veterinary Clinic (KVC) located at 72025 North Avenue, Armada, Michigan. This Facility has been assigned the State Registration Number (SRN) of P1160. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451P); the administrative rules; and Permit to Install (PTI) No. 11-21.

I entered the facility, identified myself, and met with Dr. Daren A. Krause, Owner. We began with an opening meeting, in which I explained the purpose of the inspection. Dr. Krause escorted me during the inspection of the cremation unit and provided records.

PTI No. 11-21 was approved on April 14, 2021, to install and operate a natural gas-fired cremation unit manufactured by US Cremation. Dr. Krause stated that the installation of EUCREMATORY1 was complete in January 2022. Dr. Krause stated that the first cremation occurred in February 2022 and that EUCREMATORY1 is typically operated twice each week. The cremation unit appeared to be clean and properly maintained. I observed a narrow (less than one-quarter inch) crack in the ceiling of the primary combustion chamber. The crack was fairly straight and ran from the charge door to the primary combustion burner orifice. This crack did not appear unusual compared to other similarly operated cremation units.

This pathological incinerator has a maximum permitted charge rate of 300 pounds. I discussed cremation unit operating procedures and the charge rate material limit with Dr. Krause. Dr. Krause stated that there was an event where the secondary combustion chamber temperature rose above 2000 degrees Fahrenheit. Dr. Krause stated the elevated temperature was caused by inserting a charge of more than 300 pounds in EUCREMATORY1. The exact date and weight are unknown due to non-compliant recordkeeping (see below). Dr. Krause stated he had learned from that experience and will not repeat exceeding the permitted charge weight limit. This constitutes a violation of PTI No. 11-21, EUCREMATORY1, II.2, which states, "The permittee shall not charge more than 300 pounds per charge in EUCREMATORY1, where charge is the total weight of the material placed in the incinerator to be combusted." This violation shall be cited in a violation notice.

Dr. Krause could not identify the date of each cremation because the permittee failed to keep daily records of the time, description, and weight of the charge combusted in EUCREMATORY1, as required by SC VI.3. This constitutes a violation of PTI No. 11-21, EUCREMATORY1, VI.3, which states, "The permittee shall keep, in a satisfactory manner, daily records of the time (duration of burn), description and weight of the

charge combusted in EUCREMATORY1, as required by SC II.2. The permittee shall keep all records on file and make them available to the Department upon request.” This violation shall be cited in a violation notice.

I observed that the secondary combustion chamber temperature set point was 1650 degrees Fahrenheit. I reviewed the secondary combustion chamber temperature chart records. The permittee failed to record, in a satisfactory manner, the temperature in the secondary combustion chamber of EUCREMATORY1 on a continuous basis because the records of multiple cremations overlapped (see Fig. 1). This constitutes a violation of PTI No. 11-21, EUCREMATORY1, VI.5, which states in part, “The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, secondary combustion chamber temperature records for EUCREMATORY1, as required by SC VI.2.” This violation shall be cited in a violation notice.

I conducted a closing meeting with Dr. Krause. We discussed the observed permit violations, the pending violation notice, and corrective actions. Dr. Krause expressed a cooperative attitude. I encouraged Dr. Krause to contact me if he had any questions regarding the resolution of the pending violation notice or if he had any air quality questions.

CONCLUSION

A violation notice shall be issued to Krause Veterinary Clinic for violations of PTI No. 11-21, EUCREMATORY1, II.2, VI.3, and VI.5.

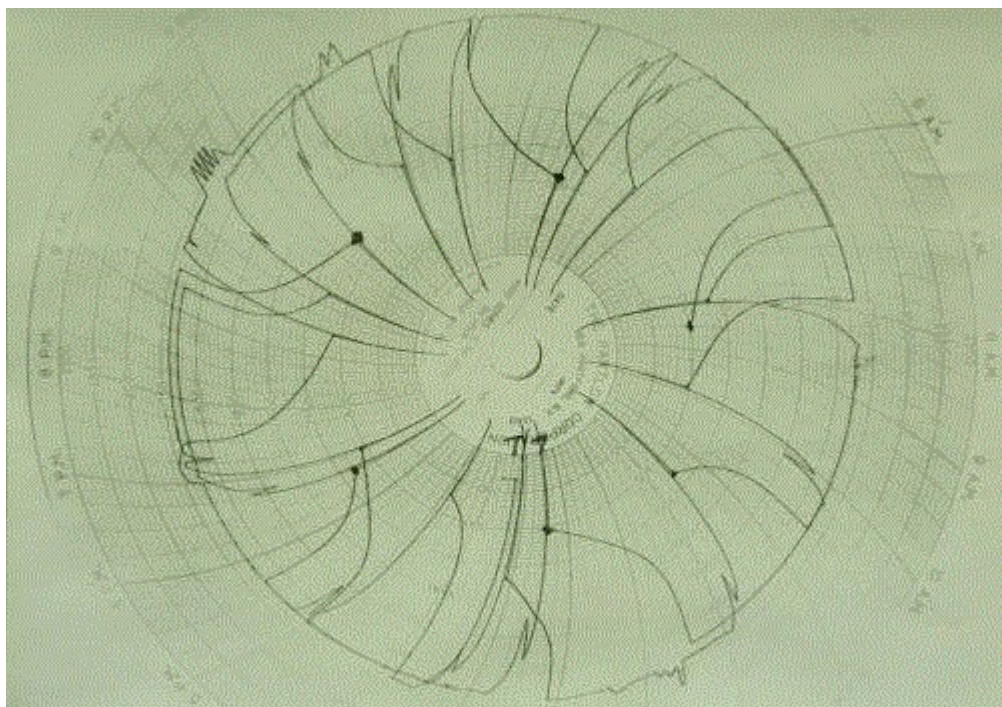


Image 1(Fig. 1) : Fig. 1: Temperature chart with overlapping records.

NAME Robert Elmarachi

DATE 8/16/2022

SUPERVISOR Joyce Z