

P1210
MANILA

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

04217

FACILITY: Ascension Reflection Cremation Services, Inc.		SRN / ID: P1210
LOCATION: 37105 Industrial Road, LIVONIA		DISTRICT: Detroit
CITY: LIVONIA		COUNTY: WAYNE
CONTACT: Peggy Finnigan, Owner		ACTIVITY DATE: 08/24/2022
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Complaint Investigation		
RESOLVED COMPLAINTS: C-22-01475, C-22-01478, C-22-01479		

DATE OF INSPECTION : 8/24/2022
 TIME OF INSPECTION : 2:00 pm
 INSPECTED BY : Jill Zimmerman
 PERSONNEL PRESENT : Peggy Finnigan, Owner
 FACILITY PHONE NUMBER : 734-855-4523
 FACILITY EMAIL : Peggy@arcservice.net

FACILITY BACKGROUND

Arc Services currently operates two cremation units in an industrial park near the intersection of Industrial Road and Newburgh Road in Livonia, Michigan. Operations at this location began about April 2022. The facility is planning to add a third unit in the next few weeks. Currently the facility operates about six to eight hours a day, six days a week.

COMPLAINT/COMPLIANCE HISTORY

On August 16, 2022, EGLE received three complaints from residents about smoke rising from the stacks at this facility. The Livonia Fire Department also received a similar complaint and had performed an inspection on August 10, 2022. A copy of this inspection report is attached to this report.

PROCESS EQUIPMENT AND CONTROLS

This facility currently operates two cremation units. Both units can handle a charge of up to 750 pounds. There is a continuous temperature recorder on each unit for the secondary chamber, and the temperature data is also collected electronically. There is a weight lift onsite, which is used to weigh each charge before the cremation begins. Both units are fueled by natural gas. A third unit is planning to be installed in the new few weeks and will be similar to the units currently operating.

INSPECTION NARRATIVE

I arrived at the site around 2:00 pm, to initially perform smoke surveillance. When I arrived, the building was dark, though there was one van in the back of the parking lot. I parked south of the facility to observe the stacks. Two stacks were seen on the roof. Initially it appeared that nothing was coming out of the stacks. At about 2:01 pm I observed grey smoke rising from the more northern stack. This smoke lasted less than a minute. Afterwards, I could see heat rising from this stack, though I did not observe any more smoke.

Next, I attempted to enter the facility, though the office was locked. As I was walking back to my car, I was approached by the operator, Danny. I explained that I was from EGLE and that we had received a complaint about smoke from the stacks. I was there to perform an inspection in response to the complaints. He called his boss, who met me at the facility for the inspection.

Ms. Peggy Finnigan arrived, and we discussed the complaints and the process at this location. Ms. Finnigan explained that she had recently started her own cremation business after working for about 20 years with a different company owned by her husband when he chose to retire and sell the business to a competitor. Ms. Finnigan explained that the bodies are brought in and stored in a chilled room. A metal ID tag is added to the body and a recorded sheet is started, which included the name, ID number, weight, and date received from the funeral home. The duration of the burn and date released are added to the form when the remains are released back to the funeral home. A copy of this form is filed onsite, and a copy is given to the funeral home. These records were reviewed onsite during the inspection.

I explained that EGLE had received complaints about black smoke at this facility. I also explained that I had observed smoke when I first arrived, though the smoke had lasted less than a minute. Ms. Finnigan explained that when body weighs more than about 300 pounds, the body needs to be placed on a wooden base when it enters the unit. As the wood burns, it creates a puff of grey smoke, which is the smoke that we are seeing.

Ms. Finnigan and I then walked through the facility. One unit was operating during the onsite inspection and the secondary unit was operating at 1686 F. There is a chilled room for storage located near the unit. Two vehicles were parked in the back of the work area. The facility also maintains a viewing area for families that wish to view the cremation.

APPLICABLE RULES/PERMIT CONDITIONS

The facility is currently operating under PTI 55-21A, which was issued on July 7, 2022, when it was modified to add the third unit. EUCREMATORY3 will not be evaluated since this unit is not installed.

EUCREMATORY1

I. Emission Limits:

1. Compliance – The PM emissions are limited to 0.20 lbs. / 1000 lbs. exhaust. Opacity of approximately 15% and lasting less than one minute was observed before I entered the facility. I did not observe any additional puffs of opacity.

II. Material Limits

1. Compliance – Only human remains are burned in the unit.

2. Compliance – The unit is not capable of handling charges greater than 750 lbs. Ms. Finnigan stated that the average charge is less than 300 lbs.
3. Compliance – The unit only operates on natural gas.

III. Process/Operational Restrictions

1. Compliance – During the onsite inspection, the secondary chamber temperature was 1686 F. Review of the chart recorder showed that while the unit is operating the secondary chamber remains above 1600 F.
2. Unknown – Because the equipment has only been operating for about four months, not much maintenance has occurred. The units are swept out after each burn.
3. Compliance -- There is a weight lift available on site.

IV, Design/Equipment Parameters

1. Compliance – The secondary chamber with afterburner was installed and appeared to be operating properly during the onsite inspection.
2. Compliance – A temperature monitoring and recording device is installed on the unit. The temperature data is also stored electronically with the manufacturer.

v. Testing/Sampling

1. NA – Testing has not been requested at this time.

VI. Monitoring/Recordkeeping

1. Compliance – All records are maintained in an acceptable manner.
2. Compliance – The temperature in the secondary chamber is continuously recorded on a chart recorder located on the unit. It is also stored electronically.
3. Compliance – A form is completed for each charge which includes a description of the charge, the start and end of each burn, and the weight. One copy of this form is sent to the funeral home with the remains. A second copy remains onsite on file. This file was reviewed onsite during the inspection.
4. Unknown – The facility has only been operating for about one quarter. Therefore, quarterly records were not completed. After the facility has operated for a longer time, quarterly records will be reviewed.
5. Compliance – A chart recorder for the temperature in the secondary chamber are maintained onsite and this file was reviewed during the onsite inspection. This data is also stored electronically.
6. Unknown – The equipment was recently installed. Service has not been required on this unit.

VII. Reporting

1. NA

VIII. Stack / Vent Restrictions

1. Compliance – The facility has not modified any of the stacks since the installation at the proper height.

IX. Other Requirements

1. NA

EUCREMATORY2

I. Emission Limits

1. Compliance – This unit was not operating during the onsite inspection. Therefore there was no exhaust to observe.

II. Material Limits

1. Compliance – Only human remains are burned in the unit.
2. Compliance – The unit is not capable of handling charges greater than 750 lbs. Ms. Finnigan stated that the average charge is less than 300 lbs.
3. Compliance – The unit only operates on natural gas.

III. Process/Operational Restrictions

1. Compliance – Review of the chart recorder showed that while the unit is operating the secondary chamber remains above 1600 F. This unit was not operating during the onsite inspection, so no temperature was being recorded.
2. Unknown – Because the equipment has only been operating for about four months, not much maintenance has occurred. The units are swept out after each burn.

IV. Design/Equipment Parameters

1. Compliance – The secondary chamber with afterburner was installed and appeared to be operating properly during the onsite inspection.
2. Compliance – A temperature monitoring and recording device is installed on the unit. The temperature data is also stored electronically with the manufacturer.
3. Compliance -- There is a weight lift available on site.

V. Testing/Sampling

1. NA – Testing has not been requested at this time.

VI. Monitoring/Recordkeeping

1. Compliance – All records are maintained in an acceptable manner.
2. Compliance – The temperature in the secondary chamber is continuously recorded on a chart recorder located on the unit. It is also stored electronically.
3. Compliance – A form is completed for each charge which includes a description of the charge, the start and end of each burn, and the weight. One copy of this form is sent to the funeral home with the remains. A second copy remains onsite on file. This file was reviewed onsite during the inspection.
4. Unknown – The facility has only been operating for about one quarter. Therefore, quarterly records were not completed. After the facility has operated for a longer time, quarterly records will be reviewed.
5. Compliance – A chart recorder for the temperature in the secondary chamber are maintained onsite and this file was reviewed during the onsite inspection. This data is also stored electronically.
6. Unknown – The equipment was recently installed. Service has not been required on this unit.

VII. Reporting

1. NA

VIII. Stack / Vent Restrictions

1. Compliance – The facility has not modified any of the stacks since the installation at the proper height.

IX. Other Requirements

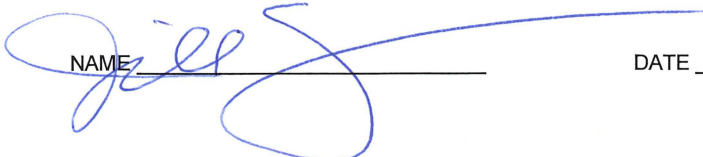
1. NA

MAERS REPORT REVIEW

This facility is not required to submit MAERS at this time.

FINAL COMPLIANCE DETERMINATION

ARC Services appears to be operating in compliance with the current permit conditions. Based on the recently received complaints, surveillance in the area will continue.

NAME  DATE 10/14/2022 SUPERVISOR 