

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

P124565897

FACILITY: Faithful Companion Memorials, Inc.		SRN / ID: P1245
LOCATION: 1909 Thunderbird Street, TROY		DISTRICT: Warren
CITY: TROY		COUNTY: OAKLAND
CONTACT: Thomas E. Rood , Chief Operating Officer		ACTIVITY DATE: 12/13/2022
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: On-site inspection.		
RESOLVED COMPLAINTS:		

On December 13, 2022, I conducted an unannounced scheduled inspection of Faithful Companion Memorials, Incorporated located at 1909 Thunderbird Street, Troy, Michigan. This facility is uniquely identified by the Air Quality Division with the State Registration Number (SRN) of P1245. 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 451); the administrative rules; and air use permit to install (PTI) number 19-22.

NOTE: As of the on-site inspection conducted on December 13, 2022, all cremation emission units and exhaust stacks have been removed from the old Royal Oak facility (N5753) and installed at the new Troy facility (P1245). The same management team operates both Faithful Companion Memorials facilities. Any N5753 compliance issues should now be addressed with management at the P1245 facility.

Upon arrival at Faithful Companion Memorials, 1909 Thunderbird Street, Troy, I met with Thomas E. Rood, Chief Operating Officer, and Wayne Kelly, Location Manager, who escorted me throughout the inspection. Faithful Companion Memorials only cremates animal remains.

EUCREMATORY2 - UNPERMITTED EMISSION UNIT

Most of the cremations units at this facility were moved from the old Faithful Companion Memorials Royal Oak location to the new Troy facility. Newer emission units were also permitted and installed. It is important to note that EUCREMATORY10 does not exist and therefore was not installed. Instead EUCREMATORY2, which was moved from the Royal Oak location was installed at the Troy location, Unfortunately, the installation of EUCREMATORY2 at the Troy location was not approved in a PTI. Therefore, the installation and operation of EUCREMATORY2 without first obtaining an approved permit to install constitutes a violation of R 336.1201(1).

On January 4, 2023, I had a follow-up conversation with Tom Rood. We discussed the email I received on December 27, 2022, in which Tom wrote,

“Hi Bob,

Re: Faithful Companion Pet Cremation Services

Relative to the correction needed for our current operating permit; I found out on the 23rd that I am going to be able to get a new machine I had ordered very quickly rather than late in the coming year as someone cancelled their order. Therefore, I am going to be applying for a new PTI that will effectively correct the current error, the machine I am going to be removing from the facility is the one that did not get moved over to the new permit from the 2018 version.

I will be replacing that piece of equipment with a new machine.

Just FYI-did not want to see too much effort put into correcting the current permit when it is going to be adjusted yet again.

Regards,

Tom”

During the January 4, 2023, follow-up telephone conversation, Tom stated that Faithful Companion has already submitted a PTI modification application to Lansing and he has been working with Marina Ostaszewski on the draft PTI. I then telephoned Marina, who verified the PTI modification is in process. It should also be noted that both the permittee and the permit engineer do not know why PTI 19-22 did not accurately identify the emission units that the permittee intended to install. This violation appears to have been an administrative error of unknown origin. This violation of R 336.1201(1) will not be cited because this error does not affect this facility’s minor source status, and the permittee has taken timely corrective actions.

Per the January 4, 2023, follow-up telephone conversation with Tom Rood, EUCREMATORY2 will be removed and replaced with a new, higher charge capacity, cremation unit that has a greater capability to control visible emissions from group cremations.

Per the temperature chart records collected during this inspection, the EUCREMATORY2 records were not satisfactory because there are no records of the emission unit ID, date, start and end time, and multiple cremation temperature records overlap. Furthermore, the temperature records show that this emission unit was routinely operated while the secondary combustion chamber was operating between 1200- and 1500-degrees Fahrenheit, which is below the AQD's minimum permitting temperature of 1600 degrees Fahrenheit. Both of these noncompliances constitute violations 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." These violations shall be cited in a violation notice. NOTE: Because essential information was not recorded, the AQD cannot determine the dates the violations occurred.

WITNESS ROOMS

The cremation units are located throughout the building because some are in witness rooms, which are tastefully decorated rooms that only show a portion of the cremation unit for family viewings of cremations. EUCREMATORY1 is in the East Witness Room and EUCREMATORY5 is in the West Witness Room.

EUCREMATORY6

During the inspection, staff observed that the permittee failed to replace the ink pen on the EUCREMATORY6 temperature chart recorder, which resulted in faint illegible recordkeeping. This constitutes a violation of PTI 19-22, FGIEB16, VI.2, which states, "The permittee shall monitor and record the temperature in the secondary combustion chamber in each unit of FGIEB16 on a continuous basis." This recordkeeping failure shall be cited in a violation notice.

EUCREMATORY9, 4-CHAMBER CREMATION UNIT

EUCREMATORY9 is a 4-chamber cremation unit. The 4-chamber cremation unit appears to present a unique compliance challenge for the permittee because one secondary combustion chamber (SCC) simultaneously controls the emissions from 4 primary combustion chambers (PCCs). The compliance challenge is created because each PCC must be cooled down before a new charge is inserted. Between cremations, the permittee cools down a PCC by opening the PCC charge door for about 15 to 30 minutes. Opening the charge door allows cooler ambient air to enter the PCC, which exits via the SCC. Unfortunately, the flow of cooler air from the cooling PCC into the SCC causes the SCC temperature to drop below the permit specified minimum of 1600 degrees Fahrenheit while other EUCREMATORY9 PCCs are operating.

It should be noted that charging the PCC without letting it cool down is called Hot Loading. Hot loading can cause the charge to combust too fast and overwhelm the

emissions control device. Faithful Companion Memorials does not perform hot loading. The cooldown procedure is part of the permittee's Malfunction Abatement Plan.

The permittee's failure to maintain a minimum temperature of 1600 degrees Fahrenheit in the SCC while any EUCREMATORY9 PCC was operating constitutes a violation of PTI 19-22, EUCREMATORY9, III.1, which states, "The permittee shall not combust waste in EUCREMATORY9 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 PTI 19-22, EUCREMATORY9, 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 EUCREMATORY9."

This also constitutes a violation of PTI 19-22, EUCREMATORY9, IV.1, which states, "The permittee shall not operate EUCREMATORY9 unless the secondary combustion chamber with afterburner is installed, maintained, and operated in a manner satisfactory to the AQD District Supervisor."

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."

The four aforementioned violations shall be cited in a violation notice.

PERMIT REVIEW COMPLIANCE ISSUE

On January 4, 2023, I spoke with Marina Ostaszewski, who is the permit engineer assigned to the Faithful Companion permit modification. We discussed the permittee's failure to maintain a minimum temperature of 1600 degrees Fahrenheit in the secondary combustion chamber while any EUCREMATORY9 primary combustion chamber was operating. We discussed potential options for the permittee to address this noncompliance. We also discussed general ideas for permit conditions to address this issue. The purpose of this conversation was to make sure the permit engineer was aware that this frequent control device noncompliance issue must be addressed during the permit review process to ensure continuous compliant operation.

Conclusion

Faithful Companion Memorials is in violation of PTI 19-22, EUCREMATORY9, III.1 and 2, IV.1; FGIEB16, VI.2; and R 336.1910, which shall be cited in a violation notice.

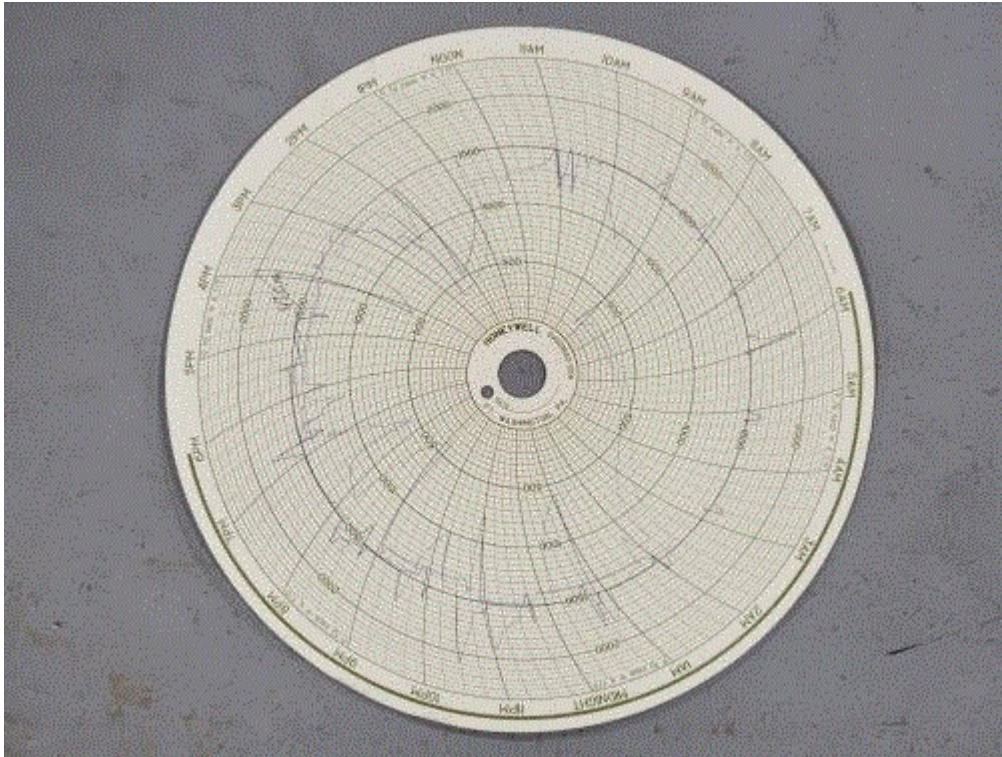


Image 1(20221213 101636) : EUCREMATORY2 temperature chart record. The permittee failed to identify the emission unit name, date, and the start and end time of each cremation. Furthermore, the temperature records are overlapping and below the 1600 degrees F permitted minimum.

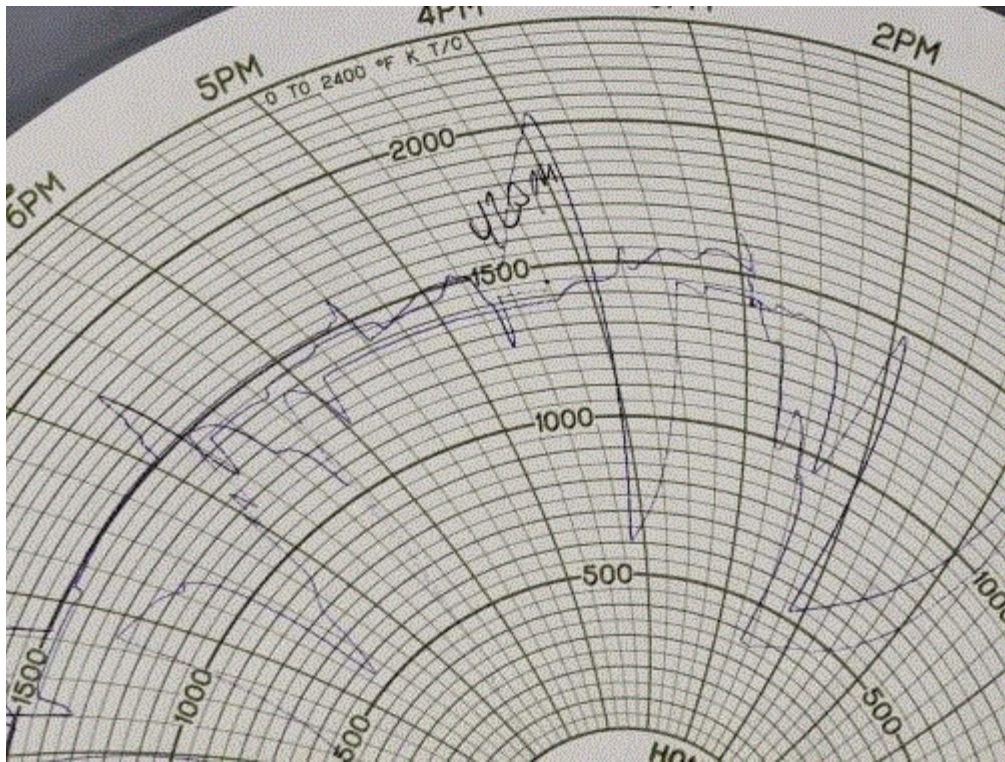


Image 2(20221213 101646) : EUCREMATORY2: Close-up view of overlapping temperature records. The records indicate the cremation unit was operating while the secondary combustion chamber temperature was less than the permitted minimum of 1600 degrees F.

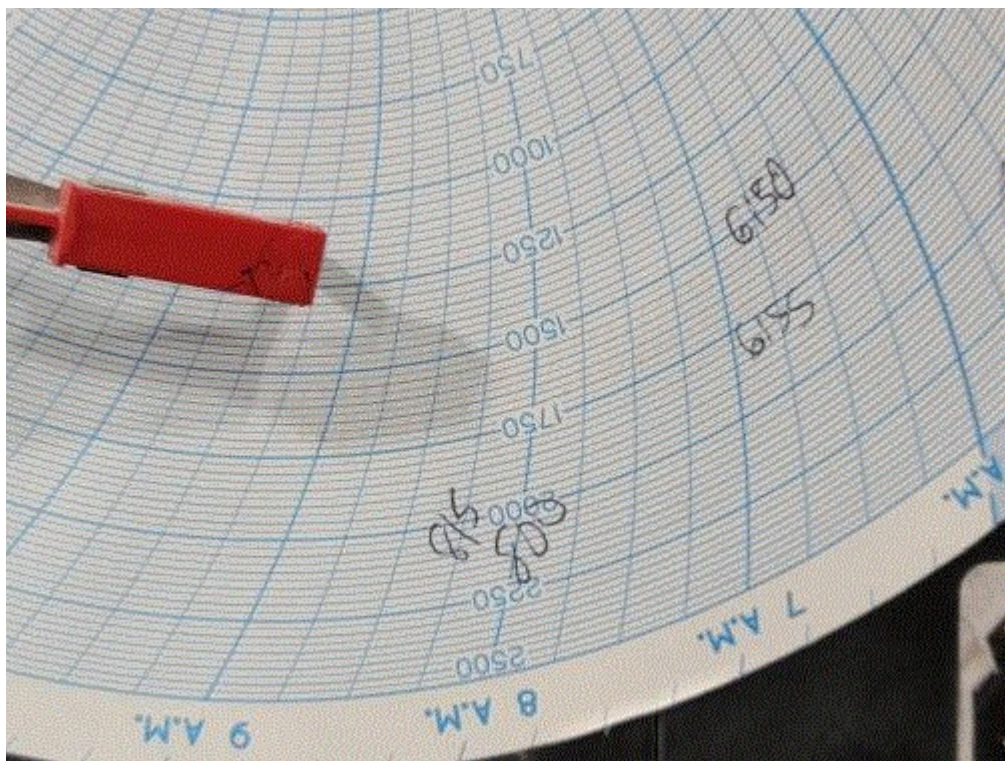


Image 3(20221213 102204) : Image of EU-CREMATORY6 temperature chart record. The permittee failed to

replace the ink pen, which resulted in very faint illegible recordkeeping. This constitutes a violation of PTI 19-22, FGIEB16, VI.2.



Image 4(IMG 0581) : Image of EUCREMATORY9. This is a 4-chamber animal cremation unit.

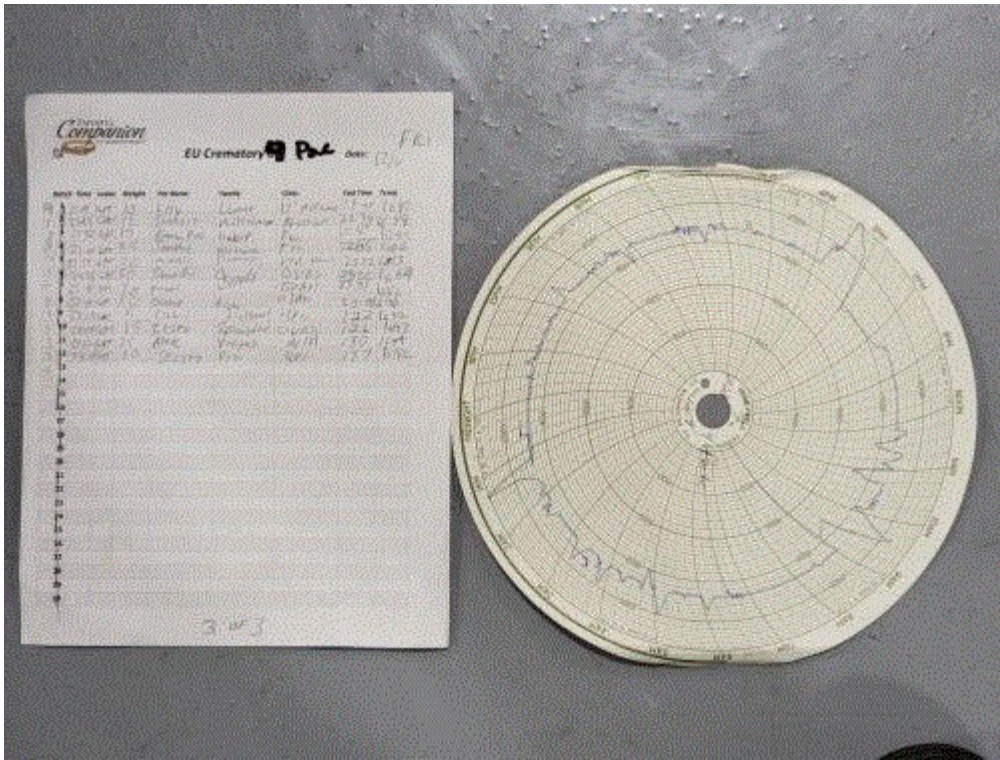


Image 5(20221213 103254) : Image of EUCREMATORY9 (4 Pack), 4-chamber animal crematorium log sheet and temperature chart for 12/9/2022.

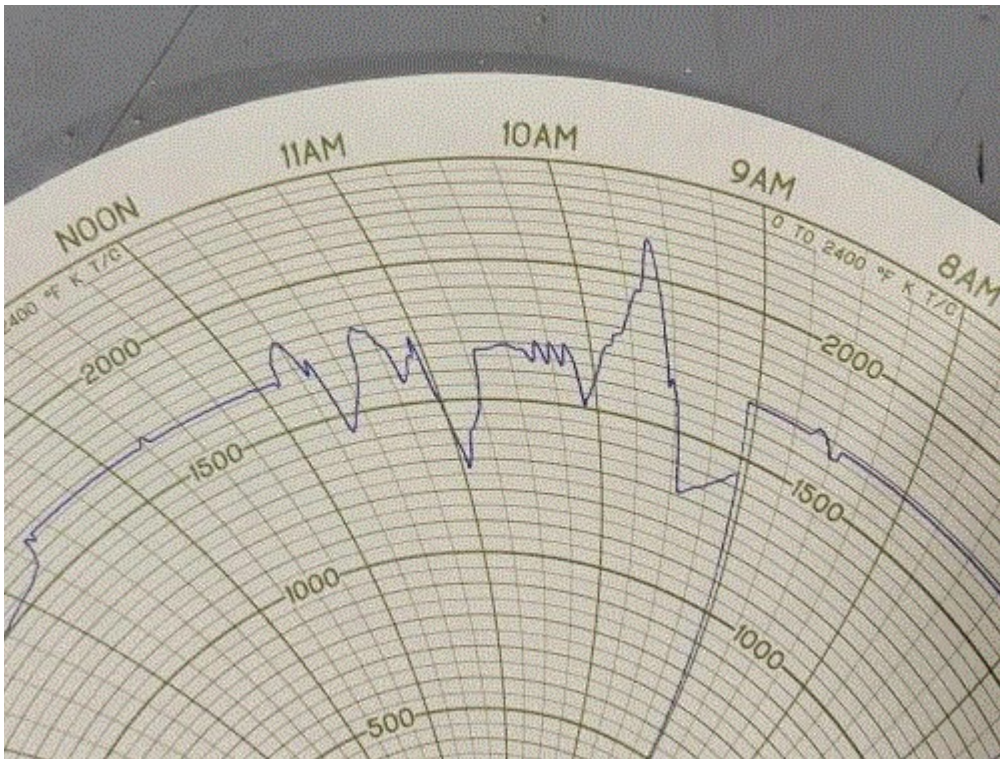


Image 6(20221213 103334) : Close up view of aEUCREMATORY9 (4 Pack) temperature record chart indicating the secondary combustion chamber temperature fell below the permitted minimum of 1600 degrees F three-times

between 9AM and NOON on 12/9/2022.

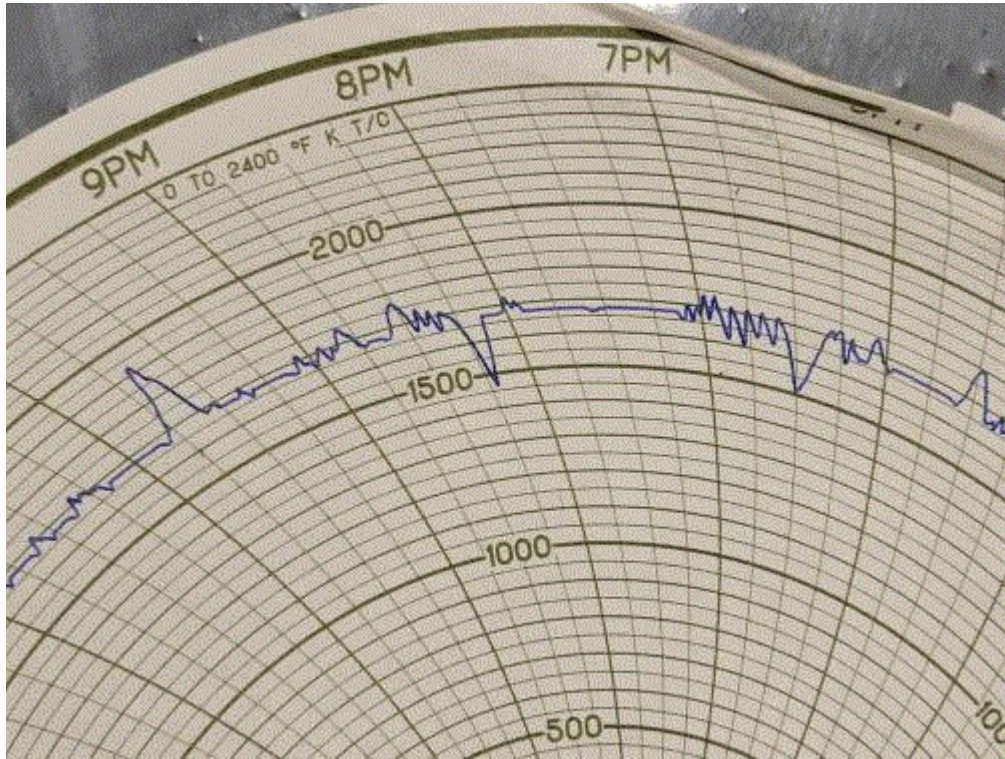


Image 7(20221213 103344) : Close up view of aEUCREMATORY9 (4 Pack) temperature record chart indicating the secondary combustion chamber temperature fell below the permitted minimum of 1600 degrees F two-times between 6PM and 9PM on 12/9/2022.

NAME Robert Elmarchi

DATE 1/5/2023

SUPERVISOR Joyce