

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

M389425971

FACILITY: Oakland Co. DPS Animal Control Division	SRN / ID: M3894
LOCATION: 1700 Brown Road, AUBURN HILLS	DISTRICT: Southeast Michigan
CITY: AUBURN HILLS	COUNTY: OAKLAND
CONTACT: JOANIE TOOLE , ADMINISTRATIVE SUPERVISOR	ACTIVITY DATE: 07/10/2014
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance
SUBJECT: Unannounced Level 2 Self-initiated Inspection	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

On July 10, 2014, I conducted an unannounced level 2 self-initiated inspection at Oakland County Department of Public Services (OC-DPS) Animal Control Division (a.k.a. Oakland County Animal Shelter), located at 1700 Brown Road, Auburn Hills, Michigan 48326. The purpose of the inspection was to determine the facility's 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 administrative rules, and the status of the facility's Permits to Install (PTI) No. 222-00A. During the inspection, I was accompanied by Joanie Toole, Administrative Supervisor for Oakland County Department of Public Services (DPS) Animal Control Division. The contact for permits, compliance, etc. is Joseph Murphy, Facilities Management Specialist for Facilities Maintenance and Operations Division of Oakland County, Michigan.

Since the February 2013 inspection, I noted 2 permits to install issued to the facility, PTI No. 56-73I and PTI No. 222-00. I noted a November 2, 2012 letter from Mr. Murphy stating that the incinerator covered by PTI No. 56-73I was dismantled in March 2005. During inspection, I verified that the unit under PTI No. 56-73I was no longer installed at the facility. Per my recommendation, PTI No. 56-73I was voided on February 26, 2013. PTI No. 222-00 was subsequently revised to PTI No. 222-00A per facility's request to allow incineration of contraband, prohibited goods, and take-back pharmaceutical waste up to 10% ratio to 90% pathological waste. This permit was issued August 1, 2013. The Oakland County Sheriff's Office was issued PTI No. 53-13 for the installation and operation of confiscated prohibited goods/contraband incineration unit. The request to modify PTI No. 222-00 was to have an alternative venue for local authorities including the County Sheriff's office (prior to installation and operation of their own unit) to dispose of confiscated prohibited goods/contrabands.

After the issuance of the permit, I met with Oakland County representatives a few times to discuss acceptable monitoring and recordkeeping requirements to determine compliance with PTI No. 222-00A permit conditions. In particular, I met with Ms. Joanie Toole to evaluate and work with her on these monitoring and recordkeeping requirements.

During the July 10, 2014 inspection, I observed the incinerator on way to shutdown mode. Per PTI No. 222-00A special condition no. EU-JAR-MCP350(III)(1), I verified the secondary chamber temperature at +/-1700°F per the chart recorder. This is in compliance with the permit limit of 1600°F. Per PTI No. 222-00A special condition no. EU-JAR-MCP350(III)(2) and after January 2014, the records I obtained from the facility showed the secondary chamber temperatures >1800°F when combusting non-pathological wastes. Per PTI No. 222-00A special condition no. EU-JAR-MCP350(III)(3), the incinerator appeared to be operating properly as I did not observe visible emissions while outside the building. Per PTI No. 222-00A special condition no. EU-JAR-MCP350(II)(1 & 6), records showed only pathological, contraband/prohibited goods and take back pharmaceutical wastes were being incinerated

and the 10% non-pathological waste limit was met on quarterly basis. Per PTI No. 222-00A special condition no. EU-JAR-MCP350(II)(2, 3, & 4), I discussed with Ms. Toole to ensure compliance with the 350 lb. total waste/charge, 45 lb. non-pathological waste/charge, and 1400 lb. total non-pathological waste incinerated per 12 month time period as recorded on a rolling monthly basis. Per PTI No. 222-00A special condition no. EU-JAR-MCP350(II)(5), the facility only burn natural gas as fuel. Per PTI No. 222-00A special condition no. EU-JAR-MCP350(IV)(1) & (VI)(2 & 4)), the facility installed and operated a rotary chart recorder to keep a continuous record of the temperature and the times when the incinerator is operating. I obtained sample copies of the chart recorder.

During the inspection, I did not observe any significant deviation and will continue to work with the facility to improve on the recordkeeping requirements.

NAME RM Bi

DATE 2/16/2014 SUPERVISOR CJE