

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

N511572253

FACILITY: LAPEER COUNTY Animal Control		SRN / ID: N5115
LOCATION: 2396 W GENESEE STREET, LAPEER		DISTRICT: Lansing
CITY: LAPEER		COUNTY: LAPEER
CONTACT: Stephanie King , Animal Control Officer		ACTIVITY DATE: 05/15/2024
STAFF: Loren Hicks	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection of facility's newly installed crematory incinerator.		
RESOLVED COMPLAINTS:		

On May 15, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), (represented by L. Hicks, K. Villalta, and M. Arduin) conducted an inspection of Lapeer County Animal Control, which was last inspected by the AQD in 2023, for the purposes of assessing compliance and to verify resolution of a recent Violation Notice. LCAC operates a no-kill animal shelter and uses a crematory incinerator to dispose of deceased animal remains typically 2-3 days per month. Occasionally, deceased pets are cremated upon request. Prior to this visit, LCAC was listed as being in non-compliance due to the installation of a new crematory incinerator prior to its being permitted, which resulted in a violation notice being issued in 2023. No odors or visible emissions were noted on our arrival; however, the incinerator was not operational on the day of our visit.

We met with Stephanie King, who gave us a tour of the facility and showed us equipment and associated records. We inspected the crematory incinerator itself, and the combustion information log. We were informed that the incinerator unit (originally built by Crawford) had been refurbished, installed, calibrated, and maintained by Burnzwell. There have since been one or two parts recalled & replaced by Burnzwell (including a part that triggered a shift between the primary and secondary chambers). The incinerator & its secondary combustion chamber appear to have been installed, maintained, and operated in a satisfactory manner; however, LCAC has not yet had installed, calibrated, maintained, or operated a device to both monitor and record the temperature in the secondary combustion chamber (further discussion below). Officer King noted that the roof had initially been leaky around the stack/roof seal after installation, but that it was repaired by staff. We confirmed that LCAC is burning only pathological waste charges of less than 200 pounds per charge using natural gas as fuel; they have kept records of the time (duration of burn), description and weight of the charge combusted since the start of operation; they have kept records of all service, maintenance, and equipment inspections; and they have kept records of the type of fuel burned. I reviewed records for maintenance, fuel types, and combustion logs. I recommended the former two be printed and added to combustion log binder for ease of access. Additionally, there was also a printed copy of their permit available.

I requested records for the secondary combustion chamber temperatures and Officer King indicated that temperatures were visually verified via the unit's HMI before initiating burn in the secondary combustion chamber but were not automatically recorded. (The incinerator unit is currently configured to monitor temperature, but it is not currently configured to record temperature.) I was hopeful at the time that the unit would have some passive internal storage from which data could be retrieved with technical assistance, as the method described to me above does not meet the permit requirement for continuous monitoring. I requested a few other records (fuel usage, maintenance, installation and operational dates, etc.) which Officer King

delivered to me promptly. Correct retention time and stack diameter were confirmed in specs provided for PTI application. I confirmed that exhaust gasses from the stack is discharged unobstructed vertically upward at a minimum height of 22.94 ft (+/- .5 ft).

After the initial inspection, I arranged an online meeting with Officer King and the technical representative from Burnzwell, Kevin Willett, who has been working with LCAC on the project since its inception. My goals were to determine a.) whether it would be possible to retrieve information from past combustion runs, and b.) whether the unit could be configured to record information for future combustion runs. I was informed by K. Willett that the unit could be modified to record temperatures during combustion runs, but had not been doing so up to this point, as that feature was not included as part of their original design plans. We discussed the permit requirement that secondary combustion chamber temperatures be both monitored and recorded continuously (at a minimum one reading every fifteen minutes), and we discussed potential paths forward, pending further review. It was determined that the lack of temperature records for the secondary combustion chamber violated LCAC's permit, and a violation notice was issued on June 11, 2024. On receipt of a response to the violation notice, we will continue to work towards resolving the violation.

NAME Loren Hicks

DATE 06/17/24

SUPERVISOR RB