

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

P058858393

FACILITY: LOYAL PAWS, LLC		SRN / ID: P0588
LOCATION: 3779 S ORTONVILLE ROAD, CLARKSTON		DISTRICT: Warren
CITY: CLARKSTON		COUNTY: OAKLAND
CONTACT: Ben Riggan , Managing Partner		ACTIVITY DATE: 04/27/2021
STAFF: Shamim Ahammod	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Conducted an onsite scheduled inspection of LOYAL PAWS, LLC (SRN: P0588) to determine the compliance with the permits.		
RESOLVED COMPLAINTS:		

On April 27, 2021, Michigan Department of Environment, Great Lakes and Energy-Air Quality Division (EGLE-AQD) staff, I (Shamim Ahammod) conducted an onsite scheduled inspection of LOYAL PAWS, LLC (SRN: P0588) located at 3779 S Ortonville Road, Clarkston, Michigan. The purpose of the inspection was to determine the company'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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) Nos. 20-15, 66-20, and 199-15.

Permit History**PTI NO. 20-15****EUCREMATORY1/North Oven**

On March 18, 2015, PTI NO. 20-15 was issued to operate the EUCREMATORY1.

Details are given below:

Matthews Cremation Division

Power Pak II (IE43-PPII)

Fuel Type: Natural Gas or LP gas

Maximum Charge: 400 Pounds

Burn Rate: 100 Pounds/Hour

Charge Type: Animal Remains

At the time of inspection, I observed secondary combustion temperature in EUCREMATORY1 was 1625-degree Fahrenheit.

PTI NO. 199-15**EUCREMATORY2/South Oven**

On November 19, 2015, PTI NO. 199-15 was issued to operate the EUCREMATORY2.

Details are given below:

Matthews Cremation Division

Power Pak II (IE43-PPII)

Fuel Type: Natural Gas or LP gas

Maximum Charge: 400 Pounds

Burn Rate: 100 Pounds/Hour

Charge Type: Animal Remains

At the time of inspection, I observed secondary combustion temperature in EUCREMATORY3 was 1666-degree Fahrenheit.

PTI NO. 66-20**EUCREMATORY3**

On July 2, 2020, PTI NO. 66-20, was issued to operate the EUCREMATORY3.

Details are given below:

Matthews Cremation Division

Power Pak II (IE43-PPII)

Fuel Type: Natural Gas

Maximum Charge: 300 Pounds

Burn Rate: 100 Pounds/Hour

Charge Type: Animal Remains

At the time of inspection, I observed secondary combustion temperature in EUCREMATORY3 was 1625-degree Fahrenheit.

Inspection Arrangement

Due to the COVID-19 pandemic, I prearranged this announced inspection for April 27, 2021.

Onsite Inspection

On April 27, 2021, at 1.55 PM, I arrived at the facility and was greeted by Mr. Benjamin Riggan, Manager of LOYAL PAWS, LLC. I introduced myself, provided credentials, and stated the purpose of the inspection. Mr. Riggan and I toured the facility. Mr. Riggan explained the process of the operation. At the time of inspection, EUCREMATORY1, EUCREMATORY2, and EUCREMATORY3 were operating.

Emission units were not labeled. I advised Mr. Riggan to level the EUCREMATORY1, EUCREMATORY2, and EUCREMATORY. I did not observe any emissions from the stack.

REGULATORY ANALYSIS

PTI NO. 20-15, EUCREMATORY1

Material Limits

Per SC II.1, the permittee does not burn any waste in EU-CREMATORY1 other than pathological wastes, according to Mr. Riggan.

Per SC II.2, I reviewed the cremation log for February 2021, and it appears the permittee does not charge more than 400 pounds per charge in EU-CREMATORY1. The maximum charge was 140 pounds per charge in EU-CREMATORY1 on February 20th, 2021.

Per SC II.3, the permittee burns only pipeline natural gas in EUCREMATORY1 according to Mr. Riggan.

Process/Operational Restrictions

Per SC III.1, I reviewed the cremation log for February 2021, and it appears the minimum temperature of 1600°F in the secondary combustion chamber was maintained.

Design/Equipment Parameters

Per SC IV.2, the permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the temperature in the secondary combustion chamber of EU-CREMATORY1 on a continuous basis. The permittee calibrated the EUCREMATORY1 on June 9, 2021 by Universal Crematory Systems and found no errors. At the time of my inspection, I received the temperature records from Mr. Riggan. I reviewed the daily continuous temperature records and found the temperature in the secondary combustion chamber of EU-CREMATORY1 was above 1600°F. More details are explained in SC VI.2 (Monitoring and record-keeping).

Monitoring/Recordkeeping

Per SC VI.2, the permittee shall monitor and record the temperature in the secondary combustion chamber of EU-CREMATORY1 on a continuous basis. I reviewed the daily continuous temperature records for February 2021 and observed the temperature in the secondary combustion chamber of EU-CREMATORY1 was above 1600°F.

Per SC VI.3, The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, daily records of the time (duration of burn), description, and weight of waste combusted in EU-CREMATORY1, as required by SC II.1, and SC II.2. For February 2021, I reviewed the cremation log that specifies the daily records of the time (duration of burn), description, and weight of waste combusted in EU-CREMATORY1.

Per SC VI.4, The permittee only burns pathological waste is burned in the incinerator according to Mr. Riggan.

STACK/VENT RESTRICTIONS

Per VIII.1, At the time of inspection, the exhaust stacks appeared vertical and unobstructed. SV-CREMATORY1 stack appeared to be at least 17 feet above ground in height.

PTI NO. 199-15 EU-CREMATORY2

POLLUTION CONTROL EQUIPMENT: Secondary combustion chamber with afterburner.

Material Limits

Per SC II.1, the permittee does not burn any waste in EU-CREMATORY2 other than pathological wastes, according to Mr. Riggan.

Per SC II.2, I reviewed the cremation log only for February 2021 and it appears the permittee does not charge more than 400 pounds per charge in EU-CREMATORY2. The maximum charge was 170 pounds per charge in EU-CREMATORY2 on February 24th, 2021.

Per SC II.3, the permittee burns only pipeline natural gas in EU-CREMATORY2 according to Mr. Riggan.

Process/Operational Restrictions

Per SC III.1, I reviewed the cremation log for EU-CREMATORY2 for February 2021, and it appears the minimum temperature of 1600°F in the secondary combustion chamber was maintained.

Design/Equipment Parameters

Per SC IV.2, the permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the temperature in the secondary combustion chamber of EU-CREMATORY2 on a continuous basis. The permittee calibrated the EU-CREMATORY2 on June 9, 2021 by Universal Crematory Systems and found no errors. I reviewed the daily continuous temperature records during the inspection.

Monitoring/Recordkeeping

Per SC VI.2, the permittee shall monitor and record the temperature in the secondary combustion chamber of EU-CREMATORY2 on a continuous basis. For February 2021, I reviewed the daily continuous secondary combustion chamber temperature records and observed the temperature in the secondary combustion chamber of EU-CREMATORY2 was above 1600°F.

Per SC VI.3, the permittee shall keep, in a manner satisfactory to the AQD District Supervisor, daily records of the time (duration of burn), description, and weight of waste combusted in EU-CREMATORY2, as required by SC II.1 and SC II.2. I reviewed the cremation log (February 2021) that specifies the daily records of the time (duration of burn), description, and weight of waste combusted in EU-CREMATORY2.

STACK/VENT RESTRICTIONS

Per VIII.1, at the time of inspection, the exhaust stacks appeared vertical and unobstructed. SV-CREMATORY2 stack appeared to be at least 20 feet above ground in height.

PTI NO. 66-20
EUCREMATORY3-North oven

The following conditions apply to EU-CREMATORY2.

Material Limits

Per SC II.1, the permittee does not burn any waste in EU-CREMATORY2 other than pathological wastes, according to Mr. Riggan.

Per SC II.2, I reviewed the cremation log only for February 2021 and it appears the permittee does not charge more than 400 pounds per charge in EU-CREMATORY3. The maximum charge was 80 pounds per charge in EU-CREMATORY3 on February 25th, 2021.

Per SC II.3, the permittee burns only pipeline natural gas in EU-CREMATORY2 according to Mr. Riggan.

Process/Operational Restrictions

Per SC III.1, I reviewed the cremation log for EU-CREMATORY2, and it appears the minimum temperature of 1600°F in the secondary combustion chamber was maintained.

Design/Equipment Parameters

Per SC IV.2, the permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the temperature in the secondary combustion chamber of EU-CREMATORY2 on a continuous basis. The permittee calibrated the EUCREMATORY3 on June 9, 2021 by Universal Crematory Systems and found no errors. For February 2021, I reviewed the daily continuous temperature records in the secondary combustion chamber of EU-CREMATORY2. More details are explained in SC VI.2 (Monitoring/record keeping)

Monitoring/Recordkeeping

Per SC VI.2, the permittee shall monitor and record the temperature in the secondary combustion chamber of EU-CREMATORY3 on a continuous basis. For February 2021, I reviewed the daily continuous secondary combustion chamber temperature records and observed the temperature in the secondary combustion chamber of EU-CREMATORY3 was above 1600°F.

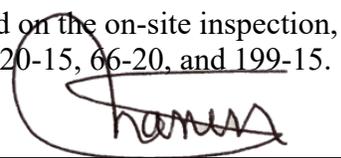
STACK/VENT RESTRICTIONS

Per VIII.1, at the time of inspection, the exhaust stacks appeared vertical and unobstructed. SV-CREMATORY2 stack appeared to be at least 20 feet above ground in height.

Conclusion

Based on the on-site inspection, it appears Loyal Paws, Inc complies with the requirements of PTI Nos. 20-15, 66-20, and 199-15.

NAME



DATE June 11, 2021

SUPERVISOR

