



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



PHILLIP D. ROOS
DIRECTOR

July 19, 2024

James Santeiu
Southern Michigan Cremation Services R.O. Inc.
4839 Fernlee Avenue
Royal Oak, MI 48073

SRN: P0932, Oakland County

Dear James Santeiu:

SECOND VIOLATION NOTICE

On July 10, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Southern Michigan Cremation Services R.O. Inc., located at 4839 Fernlee Avenue, Royal Oak, Michigan. The purpose of the inspection was to determine Southern Michigan Cremation Services' compliance with the requirements of the federal Clean Air Act; and Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; the conditions of Permit to Install (PTI) number 113-18A; and to investigate a recent complaint which we received on July 10, 2024, regarding black smoke and flames attributed to Southern Michigan Cremation Services' (SMCS) operations.

We have received your response to the Violation Notices (VN) issued on May 21, 2024, and June 24, 2024, and have determined your responses are inadequate. The written responses did not adequately identify an explanation of what steps are being taken to prevent a reoccurrence of the violation; and the May 21, 2024, and June 24, 2024, VNs remain unsolved.

In addition, AQD visited the facility on July 10, 2024, to investigate a complaint we received regarding black smoke and flames attributed to SMCS. During this inspection, AQD determined that SMCS has not taken any corrective actions to identify the previous VNS. Our evaluation during this inspection has identified additional violations.

The tables below clarify and expand upon the previous VNs and identify additional violations.

Rule/Permit Condition Violated	Comments
PTI No. 113-18A FG1200 SC III.1	SMCS failed to maintain a minimum temperature of 1600 °F in the secondary combustion chamber (SCC) while combusting waste.

	<p>On April 10, May 30, and July 10, 2024, AQD reviewed records that show the SCC in EUCREMATORY5 (unit 5) and EUCREMATORY6 (unit 6) dropped below the minimum temperature of 1600°F while combusting waste.</p>
<p>PTI No. 113-18A FG1200 SC III.2</p>	<p>Incinerators are not operated in a satisfactory manner to control emissions.</p> <p>SMCS did not maintain the SCC at or above the minimum required temperature for the duration of the burn cycle.</p> <p>SMCS staff informed AQD that both unit 5 and unit 6 were smoking for a few minutes the morning of 7/10/2024, and unit 5 had flames exiting the stack.</p> <p>Smoke lasting longer than 60 seconds and flames of any duration or size indicates failure to operate the incinerators to control emissions.</p>
<p>PTI No. 113-18A FG1200 SC IV.1</p>	<p>The SCC with afterburner is not operated in a satisfactory manner. SMCS staff stated they shut down the SCC burners when smoke begins to exit the incinerator's stacks.</p> <p>The SCC is the air cleaning device that is used to control particulate emissions, visible emissions (smoke), and odor from a pathological waste incinerator and is required to be on while combusting waste.</p>
<p>PTI No. 113-18A FG750 SC IV.3 FG1200 SC IV.3</p>	<p>The facility did not maintain a scale on-site for purposes of weighing each charge.</p>

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **August 9, 2024** (which coincides with 21 calendar days from the date of this letter). The written response should include:

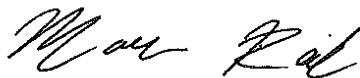
- dates the violations occurred
- explanation of the causes and duration of the violations
- whether the violations are ongoing
- summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place.
- what steps are being taken to prevent a reoccurrence

Please submit the written response to Marie Reid at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 or reidm5@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this Violation Notice does not preclude or limit EGLE's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violations or the actions necessary to bring Southern Michigan Cremation Services into compliance, please contact me at the number listed below.

Sincerely,



Marie Reid
Environmental Quality Analyst
Air Quality Division
586-249-6505

cc: Matt Dziadzio, SMCS
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE
Kerry Kelly, EGLE