



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

August 25, 2020

Dr. Matthew Capitanio  
Chief Executive Officer  
Pet and Animal Cremation Exchange  
36419 Groesbeck Highway  
Clinton Township, MI 48035

SRN: P0993, Macomb County

Dear Dr. Capitanio:

**VIOLATION NOTICE**

On August 20, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Pet and Animal Cremation Exchange located at 36419 Groesbeck Highway, Clinton Township, Michigan. The purpose of this inspection was to determine Pet and Animal Cremation Exchange'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) number 7-19.

During the inspection, staff observed the following:

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
EUBLP500	PTI No. 7-19, Special Conditions VI.2 and VI.5.	The permittee did not change the circular chart paper frequently enough, which resulted in overlapping temperature records on November 26, 2019, December 3, 2019, July 15, and 21, 2020, and August 7, 2020.
EUBLP500M3	PTI No. 7-19, Special Conditions VI.2 and VI.5.	The permittee did not change the circular chart paper frequently enough, which resulted in overlapping temperature records on June 20, and 25, 2019, September 21, and 25, 2019, December 20, 21, 27, and 28, 2019, and January 2, 2020.

EUBLP500M3	PTI No. 7-19, Special Conditions VI.2 and VI.5.	The permittee failed to replace the chart recorder ink pen frequently enough, which resulted in unreadable records. The temperature records for November 29, 2020, and December 1, 2, and 3, 2019, are unreadable because the ink is too faint or absent.
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During this inspection, it was determined that Pet and Animal Cremation Exchange failed to comply with Special Conditions VI.2 and VI.5 of EUBLP500 and EUBLP500M3 for failing to keep records of the temperature in the secondary combustion chamber on a continuous basis in a manner satisfactory to the AQD District Supervisor.

The permittee did not change the circular chart paper frequently enough, which resulted in overlapping temperature records on November 26, 2019, December 3, 2019, July 15, and 21, 2020, and August 7, 2020. These records appear to be in violation of PTI No. 7-19, EUBLP500 Special Conditions VI.2, and VI.5.

The permittee did not change the circular chart paper frequently enough, which resulted in overlapping temperature records on June 20, and 25, 2019, September 21, and 25, 2019, December 20, 21, 27, and 28, 2019, and January 2, 2020. These records appear to be in violation of PTI No. 7-19, EUBLP500M3 Special Conditions VI.2 and VI.5.

The permittee failed to replace the chart recorder ink pen frequently enough, which resulted in unreadable records. The temperature records for November 29, 2020, and December 1, 2, and 3, 2019, are unreadable because the ink is too faint or absent. These records appear to be in violation of PTI No. 7-19, EUBLP500M3 Special Conditions VI.2 and VI.5.

Per PTI No. 7-19, these recordkeeping deficiencies appear to be in violation of the recordkeeping requirements specified in Special Conditions VI.2. and VI.5. of EUBLP500 and EUBLP500M3 as follows:

VI.2. The permittee shall monitor and record, in a manner satisfactory to the AQD District Supervisor, the temperature in the secondary combustion chamber of EUBLP500 on a continuous basis.

VI.5. The permittee shall keep, in a manner satisfactory to the AQD District Supervisor, secondary combustion chamber temperature records for EUBLP500, as required by SC VI.2. The permittee shall keep all records on file and make them available to the Department upon request.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **September 15, 2020**, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a 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; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092-2793, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Pet and Animal Cremation Exchange believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Pet and Animal Cremation Exchange. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Robert Elmouchi  
Senior Environmental Quality Analyst  
Air Quality Division  
586-854-3244

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Joyce Zhu, EGLE