

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

G525246277

FACILITY: Oakland Co. Service Center		SRN / ID: G5252
LOCATION: 1200 North Telegraph Building 22 East, PONTIAC		DISTRICT: Southeast Michigan
CITY: PONTIAC		COUNTY: OAKLAND
CONTACT: Ron Shankin, Supervisor		ACTIVITY DATE: 08/30/2018
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Oakland County Animal Shelter (OCAS) animal and contraband incinerator.		
RESOLVED COMPLAINTS:		

Oakland County Animal Shelter (OCAS)**SRN: G5252**

On August 30, 2018, I conducted a scheduled inspection of the Oakland County Animal Shelter (OCAS). The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and Air Use Permit to Install (PTI) 180-16.

The Oakland County Animal Shelter (OCAS) is in building 42 East. PTI 180-16 was approved on February 10, 2017, for the installation of a Matthews IEB-16 pet cremation system (EU-CREMATORY-01). In addition to pathological waste, this natural gas-fired cremation system is also used to incinerate contraband or prohibited goods, and take-back pharmaceutical wastes. PTI 180-16 was issued under the name of Oakland County.

I entered the facility and met with Mr. Ron Shankin, Supervisor; Ms. Joanie Toole, Chief; and Mr. Matt Goschka, Maintenance Supervisor. We began the inspection with an opening meeting where I explained the purpose of the inspection.

EU-CREMATORY-01 was installed September 2017. The first cremation occurred on September 27, 2017. OCAS has two freezers where remains can be stored before cremation. Frozen remains are more likely to combust in a controlled manner.

Mr. Shankin is in charge of drug incineration. Animal cremations are performed by Animal Control Officer Gary Bacalja, and Animal Control Officer Larry Kasica.

I observed the cremation unit (EU-CREMATORY-01). It appeared properly maintained and in acceptable operating condition. Ms. Toole pointed to cracks in the refractory lining and asked if they were acceptable. Ms. Toole stated that OCAS contacted the manufacturer and was told that the cracks were normal. The largest crack was approximately 3/8 inch wide. From an air quality perspective, the refractory liner protects the steel structure of the cremation unit from damaging rates of heat transfer. I did not observe soot deposits on the building's ceiling and the cremation unit's exterior, which could indicate the uncontrolled venting of combustion gasses. The cracked refractory brick did not appear to result in uncontrolled fugitive emissions. I plan to observe the condition of the primary combustion chamber refractory liner during the next inspection.

I suggested that OCAS keep a spare thermocouple and a spare opacity sensor lamp, which are items that other crematories typically keep in stock for immediate replacement.

MATERIAL LIMITS

This crematorium is permitted to combust pathological wastes, per 40 CFR 60.15c; contraband or prohibited goods, per 40 CFR 6.2887; and take-back pharmaceutical wastes, as defined in EU-CREMATORY-01, II.1.

Per my inquiry, I was informed that OCAS does not burn any hazardous waste in EU-CREMATORY-01. Only natural gas is used to fuel this incinerator.

PROCESS/OPERATIONAL RESTRICTIONS

A review of the secondary combustion chamber temperature charts appears to indicate that OCAS has maintained a minimum temperature of 1600°F. The incinerator appeared to be installed, maintained, and

operated, in a satisfactory manner.

MONITORING/RECORDKEEPING

VI.2. Temperature charts indicate that the permittee monitored and recorded the temperature in the secondary combustion chamber of EU-CREMATORY-01 on a continuous basis.

VI.3. The permittee maintained daily records of the time (duration of burn), description of waste type, and waste weight in pounds of each charge combusted in EU-CREMATORY-01. The permittee failed to calculate and record the daily percentage of waste weight in pounds as a percentage of the total charge combusted, but the permittee maintained all the records needed to calculate the percentage. I reviewed records and calculated the 2018 second quarter percent of only pathological waste combusted, which equals 98%. This value appears to demonstrate compliance with the SC II.7 requirement that the permittee shall burn a minimum of 90 percent pathological waste by weight.

Because the permittee kept detailed records of each charge combusted, and because the permittee complied with the minimum of 90 percent pathological waste by weight, I have elected to apply enforcement discretion and not issue a violation notice for this recordkeeping deficiency. A repeat of this recordkeeping deficiency may result in a violation notice.

VI.4. The permittee's detailed recordkeeping appears to automatically satisfy the requirement to keep records on a calendar quarter basis of the periods of time when only pathological waste is burned in the incinerator, as required by 40 CFR 60.50c(b). The permittee records appear to satisfy this requirement because OCAS records the weight and description of each charge as well as records daily and monthly totals. It appears that monthly recordkeeping automatically satisfies the quarterly basis recordkeeping.

VI.5. The permittee satisfactorily recorded and kept secondary combustion chamber temperature charts

VI.6. This cremation unit is less than one year old and has not needed service or maintenance.

NOTE: Ms. Toole uses a database to comply with the permit specified recordkeeping conditions. The benefit of using a database is that recordkeeping deficiencies can be corrected globally and reports can be updated to demonstrate compliance status.

STACK/VENT RESTRICTIONS

A visual inspection of the exhaust stack appears to be in agreement with the maximum diameter of 15 inches and minimum height of 24.1 feet above ground.

CONCLUSION

The permittee appears to be in compliance with all evaluated permit conditions with the exception of the VI.3 requirement to keep daily records of the percentage of the total [pathological] charge combusted in EU-CREMATORY-01. Because this is the first time the AQD has reviewed the permittee's records, the recordkeeping deficiency did not result in an exceedance, and because the permittee has promised to correct the recordkeeping deficiency, I have elected to apply enforcement discretion and not issue a violation notice for this instance of a recordkeeping deficiency. A repeat of this recordkeeping deficiency may result in a violation notice.

NAME *W. S. Chandler*

DATE *9/25/18*

SUPERVISOR *Joyce*