

K8294
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DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

K829440778

FACILITY: Ford Road Animal Clinic		SRN / ID: K8294
LOCATION: 23520 Ford Road, DEARBORN HTS		DISTRICT: Detroit
CITY: DEARBORN HTS		COUNTY: WAYNE
CONTACT: Gerald Laspshan , DVM / Owner		ACTIVITY DATE: 07/20/2017
STAFF: Stephen Weis	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Compliance inspection of the Ford Road Animal Clinic in Dearborn Heights. This facility is scheduled for inspection in FY 2017.		
RESOLVED COMPLAINTS:		

Location:

Ford Road Animal Clinic (SRN K8294)
23520 Ford Road
Dearborn Heights

Date of Activity:

Thursday, July 20, 2017

Personnel Present:

Steve Weis, DEQ-AQD Detroit Office
Karen Walker, Practice Manager

Purpose of Activity

A self-initiated inspection of the Ford Road Animal Clinic (hereinafter "Ford Animal facility") was conducted on Thursday, July 20, 2017. The Ford Animal facility is on my list of sources targeted for an inspection during FY 2017. The purpose of this inspection was to determine compliance of operations at the Ford Animal facility with applicable rules, regulations and standards as promulgated by Public Act 451 of 1994 (NREPA, Part 55 Air Pollution Control), applicable Federal standards, and any applicable permits and orders.

Facility Description

The practice is located on the north side of Ford Road just over ¼ mile east of Telegraph Road between Rosetta and Melborn Streets. The area to the north of the practice is residential, and the incinerator, which is located outdoors at the northeast corner of the building behind a solid fence to limit access to the unit, is approximately 35 feet from the fence line of the nearest residence. The properties along the north and south side of Ford Road near the Ford Animal facility are commercial properties. The buildings on either side of the practice are currently occupied by insurance agencies.

According to the business' website (www.fordroadanimalclinic.com), the Ford Animal facility is a full-service small animal medical and surgical hospital that has been in business for over 50 years. The practice provides several services, including private cremation using an on-site incinerator.

Facility Operations

According to the business' website, the Ford Animal facility is open from 9am-7pm on Mondays, Wednesdays and Friday, from 9am-5pm on Tuesdays and Thursdays, and Saturdays from 9am-1pm.

Inspection Narrative

I arrived at the facility at 2:15pm. I entered the main entrance, and stopped at the reception desk, introducing myself and informing the person that I spoke with of the purpose of my visit. I was soon met by Karen Walker, Practice Manager for the Ford Animal facility. I explained to her that I was visiting to inquire about the on-site incinerator. I asked when the incinerator was installed. Karen replied that the incinerator has been in place since around the time that the practice opened in the mid 1960's.

I asked Karen some questions regarding the facility's usage of the incinerator. She told me that all of the material that is charged in the incinerator is generated on site by the practice; no material from sources outside of the facility is taken to be processed in the incinerator. Karen told me that the incinerator is typically operated 3 to 5 times per week, and that the incinerator has its own gas meter. Karen confirmed that the incinerator is used for animal cremations, and to burn animal tissue. Karen and I exchanged contact information.

After reviewing the records, we engaged in a summary discussion. I left the facility at 2:30pm.

Permits/Regulations/Orders/

Permits

I found correspondence related to the incinerator at the Ford Animal facility in the DEQ-AQD Detroit Office files. The earliest information dates to 1968. On October 15, 1968, information was sent to the Wayne County Health Department's Air Pollution Control Division addressing the installation of an incinerator, manufactured by McNaulin, Inc., at the Ford Road Animal Clinic. The information in the file provided that the incinerator is a Vulcanor Model P-2 organic waste crematory incinerator with three natural gas-fired burners rated at 125,000 BTU/hour. A permit, identified as number 113, was approved by Wayne County on November 25, 1968, and included the special condition that the incinerator was approved for intermittent duty.

A permit application was sent to Wayne County dated February 27, 1978 addressing the replacement of the burners in the incinerator with a single, large burner. The information associated with this permit application provided that the new burner was manufactured by Magic Servant (Model P-472E), rated at 150,000 BTU/hour, that the incinerator is rated to charge 40 pounds of Type IV waste, and that the stack associated with the incinerator is 26 feet above graded with a diameter of 10 inches. Permit No. C-4723 was approved by Wayne County on March 2, 1978. I was not able to find any specific permit conditions associated with this permit, only an approval to replace the burners.

There has been no permitting activity associated with the Ford Animal facility in the time since Permit No. C-4723 was issued.

Federal regulations

There are several Federal air regulations that have been promulgated that address various types of incinerators. The following is a list of the regulations that are the most applicable to the incinerator at the Ford Animal facility, and a brief discussion of the potential applicability of each of these regulations.

Subpart Ce (Emission Guidelines and Compliance Times for Hospital/Medical/Infectious Waste Incinerators).

Paragraph 60.32e(b) states that a combustor is not subject to this subpart during periods when only pathological waste, low-level radioactive waste and/or chemotherapeutic waste is burned. The definition of pathological waste put forth in 60.51c provides that "pathological waste means waste material consisting of only human or animal remains, anatomical parts, and/or tissue, the bags/containers used to collect and transport the waste material, and animal bedding (if applicable)". The incinerator at this facility is used entirely for animals and animal parts/tissue.

Subpart E (Standards of Performance for Incinerators). This regulation does not apply as the incinerator at this facility is far smaller than the 50 tons per day or greater charging rate criteria in 60.50(a).

Subpart Ec (Standards of Performance for New Stationary Sources: Hospital/Medical/Infectious Waste Incinerators). This regulation does not apply as the incinerator at the Ford Animal facility was installed prior to the applicability dates in the regulation.

Subpart DDDD (Emission Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units). This regulation applies to commercial and industrial solid waste incineration units, or CISWIs. A CISWI is defined in 60.2875 as "...any distinct operating unit of any commercial or industrial facility that combusts, or has combusted in the preceding months, and solid waste as that term is defined in 40 CFR Part 241. Part 241 defers to the definition of solid waste in 40 CFR 258.2, which vaguely references "...any garbage, or refuse..." in defining solid waste. It is unclear as to whether pathological waste, such as humans or animals, are intended to fall within the Part 258 definition of solid waste. Within Subpart DDDD, 40 CFR 60.2555 (a) exempts incineration units burning 90 percent or more by weight (on a calendar quarter basis) of pathological waste, low-level radioactive waste and/or chemotherapeutic waste from the requirements of Subpart DDDD.

Subpart FFFF (Emission Guidelines and Compliance Times for Other Solid Waste Incineration Units That Commenced Construction on or Before December 9, 2004). The incinerator at the Ford Animal facility does not meet the definition of OSWI (60.3078) or air curtain incinerator (60.2994(b)) as defined in this subpart.

40 CFR Part 62, Subpart HHH (Federal Plan requirements for Hospital/Medical/Infectious Waste Incinerators Constructed on Or Before December 1, 2008). Based on the applicability criteria put forth in 62.14400, a HMIWI that combusts only pathological waste, low-level radioactive waste and/or chemotherapeutic waste is not subject to the requirements of this subpart.

The exemption criteria put forth in 40 CFR Part 60 Subparts Ce, DDDD and 40 CFR Part 62 Subpart HHH require that the facility notify the EPA (or delegated enforcement authority) of an exemption claim, and keep records on a calendar quarter basis of the periods of time when only pathological waste, low-level radioactive waste and/or chemotherapeutic waste is combusted. I was told that the facility tracks the usage of the incinerator, and that it is only used to process pathological waste.

Compliance Determination

Based upon the results of the July 20, 2017 site visit and subsequent records and regulations review, the Ford Road Animal Clinic appears to be in compliance with all applicable rules, regulations and permits.

NAME

Steve W...

DATE

10/27/17

SUPERVISOR

JK