

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

N324732520

FACILITY: FOGELSONGER VAULT CO		SRN / ID: N3247
LOCATION: 1617 LEWIS ST MARQUETTE INDUSTRIAL PARK, BAY CITY		DISTRICT: Saginaw Bay
CITY: BAY CITY		COUNTY: BAY
CONTACT: Gary Fogelsonger , Owner		ACTIVITY DATE: 12/08/2015
STAFF: Gina McCann	COMPLIANCE STATUS: Non Compliance	
SUBJECT: Compliance inspection for PTIs 105-11 and 44-15. glm		SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:		

I (glm) conducted an unannounced scheduled site inspection to determine compliance with PTIs # 105-11 and 44-15. The facility operates five cremators. Units #1-#3 (PTI 44-15) and unit #4 are used for human remains. Unit #5 is used for animal remains. The facility was in noncompliance with operating and recordkeeping requirements. A Violation notice (VN) was sent to the facility on February 7, 2014 and May 16, 2014, regarding inadequate control of pollutants and opacity greater than fifty percent. During this inspection the facility was in noncompliance with operating and recordkeeping requirements. A Violation Notice (VN) was sent December 15, 2015.

General Description:

The facility operates a total of five cremator units. Three cremators (EUCREMATORY 1, EUCREMATORY2 and EUCREMATORY3) are Matthews Power Pak II installed in the 1990's. All three are permitted for human remains with a maximum charge of 300 pounds. One unit is a B & L Phoenix series (EUCREMATORY4) used for human remains with a maximum charge of 1,000 pounds and the second is a B & L BLP (EUCREMATORY5) series used for animal remains with a maximum charge of 200 pounds.

Each incinerator has an instantaneous external temperature read out for the secondary chamber, a pollution control system exhaust clarity monitor, automated burner controls, and control panels with operation status displayed for blower, afterburner, and cremation chamber status. Four incinerators were operating at the time of my site visit. There were no visible emissions from any of the incinerator emission stacks.

PTI 44-15: Noncompliance

This permit was issued as part of the response to the VNs sent in 2014. Conditions in the original PTI (#111-94A) required the secondary chamber temperature to be at 1800°F and the units were not designed to operate at that temperature. Per Matthews Cremation the units were designed to operate at a temperature of 1600°F. PTI #44-15 corrected this temperature and added additional requirements including a facility Operational Plan, minimum loading temperature, etc.

For all units the facility follows some, but not all, of the recommendations for incinerator operation and guidelines attached to each PTI. Per Mr. Fogelsonger staff has some operation training.

The facility only cremates the remains and container that the remains are delivered in. They receive the remains with a "Cremation Authorization" form from the funeral home or veterinary clinic. The form includes a list of contents to be cremated. It is against Michigan law for them to check the human remains. They record how many cremations they perform each day. Their records include the cremation authorization forms.

At the time of the inspection the facility four units were in operation, EUCREMATORY 1, EUCREMATORY2, EUCREMATORY3 and EUCREMATORY5 with operation times starting at 11:08, 11:05, 11:05 and 11:17 respectively. I observed temperatures for units 1, 2, 3 and 5 at 1604°F, 1631°F, 1647°F and 1656°F, respectively. The facility does not record the stop time of the of each charge combusted. Special Condition VI.3 requires the permittee to keep daily records of the start and stop time (duration of the burn), description and weight of the charge combusted in each incinerator in FGCREMATORY123.

The facility does not record or evaluate incidences that result in operating alarms. Per Mr. Fogelsonger the facility would be recording alarms triggered all the time. Special Condition VI.6 requires the facility to maintain a log of each time the pollution control system alarm is triggered for any incinerator in FGCREMATORY123. The facility began keeping records of opacity incidents. The most recent incident was recorded on September 22, 21-15. The pollution control system was triggered due to smoke. The incident was at 12:30 with a 240 pound, female charge, loaded feet first. Comparing the description of the charge and the facility's Operational Plan, the facility is not following their Operational Plan. A female charge over 200

pounds should be loaded anterior end first to assist in a more controlled burn.

Permit #44-15, Special Condition III.3 requires the Sunset Valley Cremation to maintain a temperature of 1600° F while the load is burning. There are multiple days, for multiple units, throughout the months of October 2015, November 2015 and December 2015 that have temperature recordings that do not meet this required minimum temperature of 1600°F. See attached records.

PTI 105-11: Noncompliance

This PTI is for two cremator units, a B & L Phoenix series (EUCREMATORY4) used for human remains with a maximum charge of 1,000 pounds and the second is a B & L BLP (EUCREMATORY5) series used for animal remains with a maximum charge of 200 pounds. The facility recognizes the B & L Phoenix unit, EUCREMATORY4 in the permit, as unit #5 and the B & L BLP, EUCREMATORY5 in the permit, as unit #4. The facility should adjust their naming convention to match the PTI.

During the inspection, EUCREMATORY4 was in operation and the temperature was not being recorded. This is a violation of the recordkeeping and emission limitations specified in Special Condition number IV.1 and VI.1. The chart recorder did not have a pen or paper in place. Three charges were in operation in this unit. Mr. Fogelsonger said that the pens were ordered and I did not verify.

The B&L (EUCREMATORY 5) unit has continuous recording charts for the secondary chambers. The Sunset Valley Cremation does not adequately operate the recording charts or maintain required temperature records. This is a violation of the recordkeeping and emission limitations specified in Special Condition number VI.3 of PTI number 105-11. The times on the circular chart are not the actual operation time of the burn. Multiple burns are recorded on the same chart to limit the number of chart recorders used. The time of the burn should be appropriately reflected on the chart recorders.

A VN was sent on December 15, 2015.

NAME Shirley R. McCann

DATE 12/15/2015 SUPERVISOR C. Hare