



Iranna Konanahalli  
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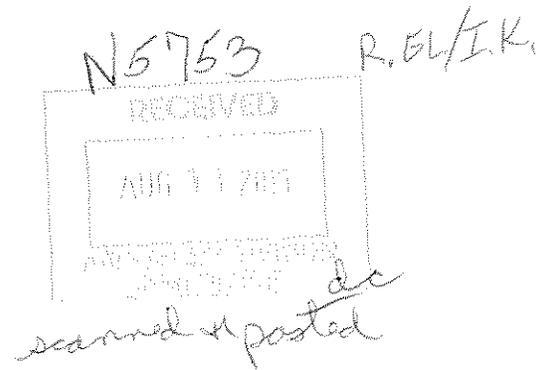
Iranna,

This letter is in response to your visit to our facility on July 7, 2015 and the violations listed for not maintaining temperature. First and foremost, please know that there will be some speculation in this letter with regards to your visit, because I haven't spoken with you and I am relying on hearsay from my employee Wayne whom you visited with. Obviously, I am not sure how your conversation went or exactly what led to these proposals in the letter I received. What I can speak on with 100 percent certain, however, is our condition of our machines.

For the past many years, I have dealt with Bob Elmouchi as our EPA representative. I recall in the beginning that his knowledge of both our machines and our permits was very limited. I remember him reading through our permits while he was here to see what was required. As time went on, he became very familiar with how we operate and what was required and we have always met every request. I am not sure if you are new to the cremation division within the EPA or not, but some of the things I heard from Wayne and the contents of this letter lead me to believe that is the case. Please do not take that as a personal insult by any means, but again, we have never met and therefore I am forced to make a few assumptions.

The bottom line is that your claims in this report and the reasoning behind them are completely false. Item #3 states that "SMS/FCM is frequently operating incinerators at less than 1600 degrees Fahrenheit." This is completely factually incorrect. I have reviewed the temperature charts for the last month on all 6 of my machines and they clearly show that we have no issues maintaining temperature. It is my understanding that during your visit, you never even asked to see our temperature charts. Therefore, how can you make such a claim? There may have been a brief violation on the 2 machines that you glanced at briefly in that moment, but this certainly doesn't constitute an ongoing problem.

Secondly, you mention installing computer combustion controls which are completely unnecessary for our operation, and will do nothing to correct the violation that you witnessed. You speak of operator error, which from my understanding, may have been something Wayne said to you with regards to the throat air turning off too soon. What he failed to mention (my assumption) is that these machines already have electronic pollution controls. Even if the throat air turned off too soon, the slightest puff of any smoke would trigger the pollution control system and turn the throat air right back on automatically. I have spoken with Matthews Cremation on this equipment many times and they have informed me that the computer combustion is completely unnecessary. This technology is designed for crematories that are running cremations when nobody is present at the facility. We are staffed from 8 am to midnight so there is always somebody here to operate the machines. The reality is that your claim that "frequent visible emissions and lower temperatures are observed" because we don't have these on our machines is again, completely inaccurate. Moreover, these computer combustion control systems are not a requirement for our permit.





Thirdly, you say that we must include a plan to convert paper temperature charts into electronic data and transfer it to an excel spreadsheet. Truthfully, my only response to this is – Why? Again, there is no requirement in my permit to maintain electronic temperature data or spreadsheets. Second, you never even asked to review our temperature data in the first place. There is nothing insufficient about our recording. We have made a couple changes over the years to meet the request of Bob Elmouchi to satisfy our permits and it is my position that we are doing exactly what is required of us. Furthermore, I called Matthews Cremation to ask about digital chart recorders because I thought it may have some value to me anyway if it prevented us from having to change charts every day. They informed me that they no longer install the digital charts as an option. They said that was in response to more DEQ's across the country having difficulty with them for whatever reason.

On top of all this, we perform annual inspections of all of our units and maintain maintenance records on each machine. Truthfully, I would challenge you to find a crematory that is more on top of our EPA requirements than we are. Our entire staff knows that our number one priority in operating the machines is to prevent any visible smoke from leaving our machines.

The bottom line is that there is absolutely nothing wrong with our machines and the requested actions will do nothing to address the issue that you witnessed. **The only reason that the machines may have been operating below 1600 degrees is that our staff failed to let the machine reach proper temperature before starting the cremation.** From what Wayne told me, he had just put the body in a few minutes prior. If this happens in a cold retort in the beginning of the day, there is absolutely zero chance of pollution. I know that from my 20 years of experience in this field. However, I do realize that this is still in violation of our permit and I am already working to correct it. I have informed our operators of the violation and reiterated that they must be sure to let the machine reach proper temperature before beginning a cremation. This is the only solution to address the violation that you witnessed.

I would be glad to schedule a follow up visit with you in the near future in order to introduce myself as well as show you that our machines are functioning properly. I would recommend something in the afternoon to be sure that all machines are running. Due to the way we operate, we hardly have all machines up and running first thing in the morning. They are usually all in operation in the afternoon.

Please contact me directly on my cell at (248) 921-1984.

Kind Regards,

Jason Santeiu