

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

N575334667

FACILITY: S. M. Services / Faithful Companion Memorials.		SRN / ID: N5753
LOCATION: 4900 FERNLEE, ROYAL OAK		DISTRICT: Southeast Michigan
CITY: ROYAL OAK		COUNTY: OAKLAND
CONTACT: Thomas E. Rood, Dir. of Market Development / General Manager		ACTIVITY DATE: 05/09/2016
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Self-initiated inspection.		
RESOLVED COMPLAINTS:		

On Thursday, April 21, 2016, and Monday, May 9, 2016, I conducted unannounced inspections of S. M. Services / Faithful Companion Memorials (S. M. Services) located at 4900 Fernlee, Royal Oak, Michigan. This facility is uniquely identified by the Air Quality Division with the State Registration Number (SRN) of **N5753**. 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) number 310-05C.

Iranna Konanahalli, AQD Environmental Engineer, accompanied me during the inspection of April 21, 2016.

On April 21, 2016, Mr. Konanahalli and I entered the facility, identified ourselves and discussed the purpose of the inspection during the opening meeting. We met with Mr. Thomas E. Rood, Director of Market Development and General Manager. Also present during a portion of the inspection on April 21, 2016, was Mr. Wayne Kelly, Operations Manager.

Mr. Konanahalli and I observed the emission units. EU-CREMATORY4 (right human crematory) was operating and we observed that the secondary temperature monitor displayed a temperature of 1530 degrees Fahrenheit (F) at 3:20 p.m. I asked when the cremation began and Mr. Rood stated that the cremation began about 3:10 p.m. and the charge was approximately 150 pounds. Mr. Konanahalli and I continued to observe the secondary temperature monitor display. At 3:35 p.m. the temperature dropped to 1397 F. At 3:50 p.m. the temperature dropped to 1354 F. At 4:02 p.m. the temperature dropped to 1340 F. We discussed this noncompliance and Mr. Rood was not sure of the cause. Mr. Rood did mention the possibility of installing a natural gas fuel regulator on each crematory, which might resolve the problem. PTI No. 310-05C, Special Condition (SC) III.1 states, "The permittee shall not combust waste in EU-CREMATORY4 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 seconds in the secondary combustion chamber are maintained." The minimum temperature of 1600°F was not maintained in EU-CREMATORY4 therefore this non-compliance shall be cited in a violation notice.

On May 9, 2016, I returned for a follow up inspection and observed that the EU-CREMATORY3 (left human crematory) secondary temperature monitor displayed a temperature of 1533 degrees Fahrenheit (F) at 3:43 p.m. I looked at the continuous temperature chart and there was no dip in the recorded temperature that might indicate the charge door had been recently opened. Mr. Rood stated that, with human cremations, it is sometimes difficult to maintain the secondary combustion chamber temperature at 1600 degrees F but he was not sure of the cause. This noncompliance with 310-05C, SC III.1 shall be cited in a violation notice.

On April 21, 2016, I reviewed the circular paper temperature charts with Mr. Rood. Mr. Rood and I discussed the lack of accuracy the charts provide because the time on the chart that the minimum secondary combustion chamber temperature reached 1600°F did not always coincide with the start time of the cremation log. Mr. Rood agreed to have the operator mark the start time of each cremation on each chart. This is necessary to determine if the minimum secondary combustion chamber

temperature was achieved and maintained during each cremation. Mr. Rood also agreed to have the complete date (e.g. month, day and year) written on each chart.

On April 21, 2016, I reviewed the charge weight records with Mr. Rood. I observed that each charge weight value ended in a "0" or "5." Mr. Rood explained that the weight values entered were estimates and not measured weights. This appears to be in violation of PTI No. 310-05C; EU-CREMATORY1, SC VI.2; EU-CREMATORY2, SC VI.2; EU-CREMATORY3, SC VI.2; EU-CREMATORY4, SC VI.2; EU-CREMATORY5, SC VI.2; and EU-CREMATORY6 SC VI.3 because charge weights were not measured in a satisfactory manner. Furthermore, the failure to determine the actual charge weight means that the permittee cannot demonstrate compliance with the permitted charge weight limit specified for each emission unit. The noncompliances regarding charge weight recordkeeping shall be cited in a violation notice.

EU-CREMATORY1 is the north most animal crematory, is located in a decorated room and used for individual private pet cremations. Per my inspection on April 21, 2016, the permittee failed to record the March 26, 2016, Batch 3 end time therefore the duration of the burn was not recorded. This noncompliance with 310-05C, SC VI.2 shall be cited in a violation notice.

EU-CREMATORY3 is the left (north) human crematory. Per my inspection on April 21, 2016, a review of recordkeeping revealed that the continuous temperature charts for March 2 and March 3, 2016, did not record the secondary combustion chamber temperature on a continuous basis. This is in violation of PTI No. 310-05C; EU-CREMATORY3, SC VI.1, which shall be cited in a violation notice.

The permittee failed to record the Batch 7 start time on the human cremation log for March 2, 2016, therefore the duration of the burn was not recorded. This noncompliance with PTI No. 310-05C; EU-CREMATORY3, SC VI.2 shall be cited in a violation notice.

EU-CREMATORY4 is the right (south) human crematory. Per my inspection on April 21, 2016, I observed that the March 23, 2016, continuous temperature chart data was illegible and therefore the permittee did not record the secondary combustion chamber temperature on a continuous basis. This is in violation of PTI No. 310-05C; EU-CREMATORY4, SC VI.1. This noncompliance with 310-05C, SC VI.1 shall be cited in a violation notice.

EU-CREMATORY5 is a group animal crematorium. Per my inspection on April 21, 2016, I observed that the records for March 4, 10, 11 and 13, 2016, had batch cremation records in which some of the end times were not recorded therefore the duration of the burn was not recorded. This noncompliance with EU-CREMATORY5 310-05C, SC VI.2 shall be cited in a violation notice.

EU-CREMATORY6 is a group animal crematorium. Per my inspection on May 9, 2016, I determined that the permittee did not keep records on a quarter basis of the periods of time when only pathological waste is burned in the incinerator as required per 40 CFR 60.50c(b) and SC VI.5. This noncompliance with 310-05C, SC VI.5 shall be cited in a violation notice.

## CONCLUSION

S. M. Services / Faithful Companion Memorials appear to be in violation of multiple process/operational restrictions and monitoring/recordkeeping requirements. The observed noncompliances shall be cited in a violation notice.

NAME

DATE

5/26/16

SUPERVISOR

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