

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

N575364119

<b>FACILITY:</b> Faithful Companion Memorials, Inc.		<b>SRN / ID:</b> N5753
<b>LOCATION:</b> 4900 FERNLEE, ROYAL OAK		<b>DISTRICT:</b> Warren
<b>CITY:</b> ROYAL OAK		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b> Dominic Caputo , Operations Manager		<b>ACTIVITY DATE:</b> 08/02/2022
<b>STAFF:</b> Robert Elmouchi	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Unannounced scheduled inspection.		
<b>RESOLVED COMPLAINTS:</b> C-22-00780, C-22-01348		

**On August 2, 2022, I conducted an unannounced scheduled inspection of Faithful Companion Memorials, Incorporated 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; air use permit to install (PTI) number 310-05D; and in response to black smoke reported by an AQD Environmental Engineer on August 1, 2022.**

## BACKGROUND

**Faithful Companion Memorials was formerly known as S. M. Services / Faithful Companion Memorials. Per PTI 310-05C, S. M. Services / Faithful Companion Memorials was approved to operate four (4) animal cremation units and two (2) human cremation units.**

**Subsequently, S. M. Services / Faithful Companion Memorials have separated and become two distinct business entities, which are owned and operated by different persons. The S. M. Services portion of the business, now known as Southern Michigan Cremation Services R.O. Inc., has moved to 4839 Fernlee and is permitted to operate four (4) human crematoriums per PTI 113-18A. Faithful Companion Memorials remains at 4900 Fernlee and is permitted to operate six (6) animal crematoriums. This inspection only evaluates the air quality compliance status of Faithful Companion Memorials.**

## BLACK SMOKE REPORT

**On the evening of July 30, 2022, Stephen Weiss – AQD Senior Environmental Engineer, observed and recorded a video of a black smoke plume (see photo below) being emitted from Faithful Companion Memorials. The observations and video were reported to my supervisor and forwarded to me to investigate.**

## ON-SITE INSPECTION

On August 2, 2022, I determined that the reported black smoke plume was emitted from EU-CREMATORY1. The black smoke plume indicates that the permittee failed to maintain, operate, and control emissions from EU-CREMATORY1 in a satisfactory manner. This constitutes a violation of PTI No. 310-05D, EU-CREMATORY1, III.2, which states in part, *“The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EU-CREMAOTRY1.”* This also constitutes a violation of PTI No. 310-05D, EU-CREMATORY1, IV.1, which states, *“The permittee shall not operate any crematory in EU-CREMATORY1 unless the secondary combustion chamber with afterburner is installed, maintained, and operated in a satisfactory manner.”* And this constitutes a violation of R 336.1910, which states, *“An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.”* These violations shall be cited in a violation notice.

On August 2, 2022, before entering the facility, I conducted exterior observations of Faithful Companion Memorials. I parked my vehicle at a location where I could observe all the Faithful Companion Memorials’ exhaust stacks with the sun behind me. The sky was clear, the temperature was approximately 75 degrees Fahrenheit, the wind speed varied from calm to about 5 miles per hour, and the wind direction varied from southeast to southwest.

During the exterior observation period, I observed black smoke being emitted from EU-CREMATORY5, and EU-CREMATORY8 on a continual basis. These black smoke plumes indicate that the permittee operated EU-CREMATORY5 and EU-CREMATORY8, which are in FG-IEB16, while the secondary combustion chamber with an afterburner was not maintained and operated in a satisfactory manner. This constitutes a violation of PTI No. 310-05D, FG-IEB16, IV.1, which states, *“The permittee shall not operate any crematory in FG-IEB16 unless its respective secondary combustion chamber with afterburner is installed, maintained, and operated in a satisfactory manner.”* This also constitutes a violation of R 336.1910, which states, *“An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.”* These violations shall be cited in a violation notice.

I entered the building, introduced myself, and met with Dominic Caputo, Operations Manager. We held an opening meeting, a facility inspection, and then a closing meeting. Wayne Kelly, Location Manager, attended the closing meeting.

I observed all cremation units. The control panel on EU-CREMATORY6 was open due to a malfunction with the charge door control mechanism. All cremation units were coated with varying amounts of black soot. I was told that deceased animals are in boxes or body bags when placed in the cremation unit. Approximately 90% of cremations are communal.

Per records received on August 2, 2022, on June 1, 2022, the permittee combusted waste in EU-CREMATORY7, which is in FG-IEB16, while the secondary combustion chamber temperature was at 1500°F, which is 100°F less than the permit required minimum of 1600°F. This constitutes a violation of PTI No. 310-05D, FG-IEB16, III.1, which states, *“The permittee shall not combust waste in any unit in FG-IEB16 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 seconds in the respective secondary combustion chamber are maintained.”* This also constitutes a violation of FG-IEB16, III.2, which states in part, “The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EU-CREMATORY7.” And this constitutes a violation of R 336.1910, which states, “An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.” These violations shall be cited in a violation notice.

Per records received on August 2, 2022, on July 2, 2022, the permittee combusted waste in EU-CREMATORY7, which is in FG-IEB16, while the secondary combustion chamber temperature was at 1525°F, which is 75°F less than the permit required minimum of 1600°F. This constitutes a violation of PTI No. 310-05D, FG-IEB16, III.1, which states, *“The permittee shall not combust waste in any unit in FG-IEB16 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 seconds in the respective secondary combustion chamber are maintained.”* This also constitutes a violation of FG-IEB16, III.2, which states in part, “The incinerator shall be installed, maintained, and operated in a satisfactory manner to control emissions from EU-CREMATORY7.” And this constitutes a violation of R 336.1910, which states, “An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.” These violations shall be cited in a violation notice.

Per records received on August 2, 2022, on July 2, 2022, the permittee combusted waste in EU-CREMATORY8, which is in FG-IEB16, while the secondary combustion chamber temperature was at 1550°F, which is 50°F less than the permit required minimum of 1600°F. This constitutes a violation of PTI No. 310-05D, FG-IEB16, III.1, which states, *“The permittee shall not combust waste in any unit in FG-IEB16 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 seconds in the respective secondary combustion chamber are maintained.”* This also constitutes a violation of R 336.1910, which states, “An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.” These violations shall be cited in a violation notice.

Per a review of records received on August 2, 2022, the permittee failed to complete all required records in a format acceptable to the AQD District Supervisor. Cremation logs contained false handwritten temperature records compared to the continuous temperature chart records (e.g., every handwritten record indicates 1650° F whereas temperature chart records indicate different values, some of which were as low as 1500°F), time records do not indicate a.m. or p.m. or switch from 12-hour to 24-hour time, plus some of the time records on the logs and temperature charts are

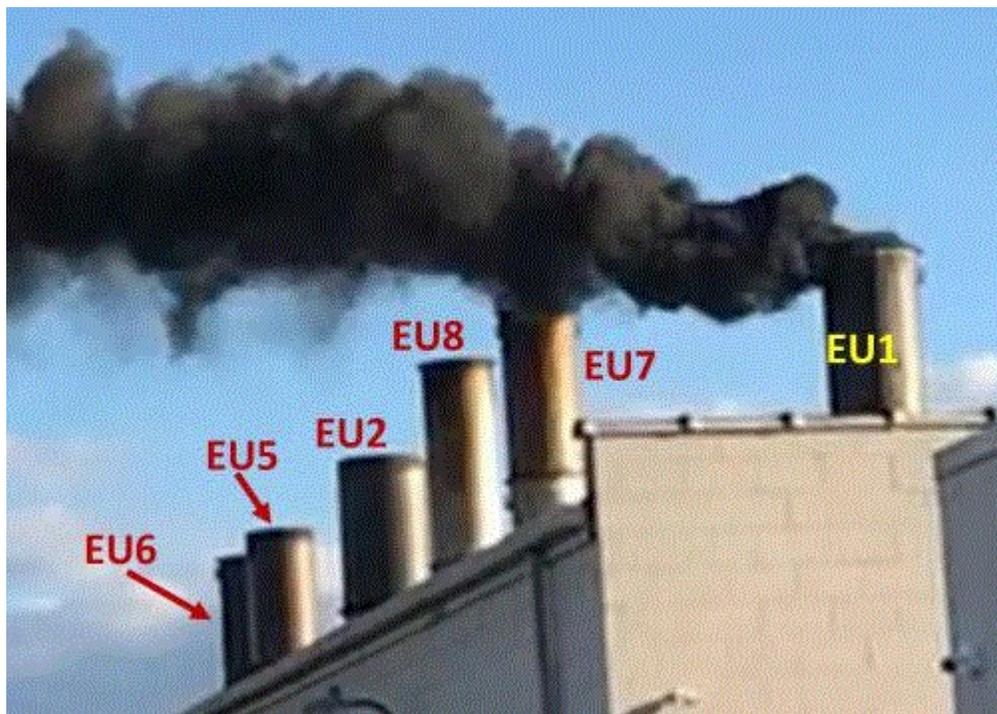
unreadable or incomplete. This constitutes a violation of PTI No. 310-05D, EU-CREMATORY1, VI.1, EU-CREMATORY2, VI.1, and FG-IEB16, VI.1, which states, “*The permittee shall complete all required records in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.*” These violations shall be cited in a violation notice.

## CONCLUSION

Faithful Companion Memorials, Inc. is in violation of multiple permit conditions, and R 336.1910. These violations shall be cited in a violation notice.



**Image 1(Weiss VIDEO still)** : Still image of the black smoke plume from Faithful Companion Memorials. The image was extracted from a video taken by Stephen Weiss, AQD Senior Environmental Engineer. The video was taken on July 30, 2022.



**Image 2(N5753 Stack IDs) :** Identification of each emission unit (EU) associated with each exhaust stack.  
 NOTE: The AQD naming convention is to identify the process equipment as an emission unit (EU) and the associated exhaust point as a stack vent (SV).

NAME *Robert Elmarche*

DATE 8/30/2022

SUPERVISOR *Joyce Z*