



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

June 2, 2016

Mr. Jason Santeiu
S. M. Services / Faithful Companion Memorials
4900 Fernlee Avenue
Royal Oak, MI 48073-1017

SRN: N5753, Oakland County

Dear Mr. Santieu:

VIOLATION NOTICE

On April 21, 2016, and May 9, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of S. M. Services / Faithful Companion Memorials located at 4900 Fernlee Avenue, Royal Oak, Michigan. The purpose of this inspection was to determine S. M. Services / Faithful Companion Memorials' compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules and the conditions of Permit to Install (PTI) number 310-05C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-CREMATORY4, right human crematory.	PTI No. 310-05C, Special Condition No. III.1.	On April 21, 2016, the AQD observed that the secondary combustion chamber temperature dropped from 1530°F to 1340°F during a human cremation. The permit condition requires a minimum temperature of 1600°F.
EU-CREMATORY3, left human crematory.	PTI No. 310-05C, Special Condition No. III.1.	On May 9, 2016, the AQD observed that the secondary combustion chamber temperature was 1533°F during a cremation. The permit condition requires a minimum temperature of 1600°F.

EU-CREMATORY1, EU-CREMATORY2, EU-CREMATORY3, EU-CREMATORY4, EU-CREMATORY5,	PTI No. 310-05C, Special Condition No. VI.2.	Permittee only estimated charge weight and did not measure the weight of waste combusted in a satisfactory manner.
EU-CREMATORY6	PTI No. 310-05C, Special Condition No. VI.3.	Permittee only estimated charge weight and did not measure the weight of waste combusted in a satisfactory manner.
EU-CREMATORY1	PTI No. 310-05C, Special Condition No. VI.2.	Permittee failed to record the March 26, 2016, Batch 3 end time; therefore the duration of the burn was not recorded.
EU-CREMATORY3	PTI No. 310-05C, Special Condition No. VI.1.	On March 2 and 3, 2016, the permittee failed to record the secondary combustion chamber temperature on a continuous basis.
EU-CREMATORY3	PTI No. 310-05C, Special Condition No. VI.2.	Permittee failed to record the March 2, 2016, Batch 7 start time; therefore the duration of the burn was not recorded.
EU-CREMATORY4	PTI No. 310-05C, Special Condition No. VI.1.	The March 23, 2016, continuous temperature chart data was illegible; therefore the permittee did not record the secondary combustion chamber temperature on a continuous basis.
EU-CREMATORY5	PTI No. 310-05C, Special Condition No. VI.2.	On March 4, 10, 11 and 13, 2016, the permittee failed to record some batch end times; therefore the duration of the burn was not recorded.
EU-CREMATORY5	PTI No. 310-05C, Special Condition No. VI.5 and 40 CFR 60.50c(b).	Permittee failed to keep records on a quarterly basis of the periods of time when only pathological waste is burned in the incinerator.

During the inspection of April 21, 2016, the AQD observed that S. M. Services / Faithful Companion Memorials failed to maintain the permit required secondary combustion chamber temperature of 1600°F in EU-CREMATORY4. The secondary combustion chamber temperature dropped from 1530°F to 1340°F during a human cremation. PTI No. 310-05C, Special Condition No. III.1 requires a minimum temperature of 1600°F.

During the inspection of May 9, 2016, the AQD observed that S. M. Services / Faithful Companion Memorials failed to maintain the permit required secondary combustion chamber temperature of 1600°F in EU-CREMATORY3 as required per PTI No. 310-05C, Special Condition No. III.1. The secondary combustion chamber temperature was 1533°F during a human cremation.

During the inspection of April 21, 2016, the AQD observed that S. M. Services / Faithful Companion Memorials failed to satisfactorily record the weight of each charge combusted in EU-CREMATORY1, EU-CREMATORY2, EU-CREMATORY3, EU-CREMATORY4, EU-CREMATORY5 per PTI No. 310-05C, Special Condition No. VI.2; and EU-CREMATORY6 per PTI No. 310-05C, Special Condition No. VI.3 because charge weights were estimated and not actual weights.

During the inspection of April 21, 2016, the AQD observed that S. M. Services / Faithful Companion Memorials failed to record the March 26, 2016, Batch 3 end time for EU-CREMATORY1; therefore the duration of the burn was not recorded as required per PTI No. 310-05C, Special Condition No. VI.2.

During the inspection of April 21, 2016, the AQD observed that S. M. Services / Faithful Companion Memorials failed to record the March 2 and March 3, 2016, EU-CREMATORY3 secondary combustion chamber temperature on a continuous basis as required per PTI No. 310-05C, Special Condition No. VI.1.

During the inspection of April 21, 2016, the AQD observed that S. M. Services / Faithful Companion Memorials failed to record the March 2, 2016, Batch 7 start time; therefore the duration of the burn was not recorded as required per EU-CREMATORY3, PTI No. 310-05C, Special Condition No. VI.2.

During the inspection of April 21, 2016, the AQD observed that S. M. Services / Faithful Companion Memorials failed to record the March 23, 2016, EU-CREMATORY4 secondary combustion chamber temperature on a continuous basis as required per PTI No. 310-05C, Special Condition No. VI.1.

During the inspection of April 21, 2016, the AQD observed that S. M. Services / Faithful Companion Memorials failed to record the March 4, 10, 11 and 13, 2016, batch end times for some cremations. Therefore the duration of the burns in EU-CREMATORY5 was not recorded, in a satisfactory manner, as required per PTI No. 310-05C, Special Condition No. VI.2.

During the inspection of May 9, 2016, the AQD observed that S. M. Services / Faithful Companion Memorials failed to keep records for EU-CREMATORY5 on a quarterly basis of the periods of time when only pathological waste is burned in the incinerator as required per PTI No. 310-05C, Special Condition No. VI.5 and 40 CFR 60.50c(b).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 24, 2016.

The written response should include:

- the dates each violation occurred;
- an explanation of the causes and duration of each violation;
- whether each violation is ongoing;
- a summary of the actions that have been taken and are proposed to be taken to correct each violation and
- the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If S. M. Services / Faithful Companion Memorials believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspections of April 21, 2016 and May 9, 2016. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Robert Elmouchi
Environmental Quality Analyst
Air Quality Division
586-753-3736

cc/via e-mail: Mr. Thomas E. Rood, S. M. Services / Faithful Companions
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ