

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

N684347052

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|-------------------------------------------------------------------------------------------------------------------------|-----------------------------------|---------------------------|
| FACILITY: Central Mich Crematory | | SRN / ID: N6843 |
| LOCATION: 455 N Mason, MASON | | DISTRICT: Lansing |
| CITY: MASON | | COUNTY: INGHAM |
| CONTACT: Mickey Brutsche , Owner | | ACTIVITY DATE: 11/13/2018 |
| STAFF: Samantha Braman | COMPLIANCE STATUS: Non Compliance | SOURCE CLASS: MINOR |
| SUBJECT: Scheduled, unannounced inspection of the Mason facility for compliance with permits 161-00, 228-09 and 128-12. | | |
| RESOLVED COMPLAINTS: | | |

Safety Equipment Required: None required.

Purpose: Unannounced, scheduled inspection for compliance with Permits 161-00, 228-09, 128-12.

Location: Central Michigan Crematory is in an industrial area in the town of Mason. There are no nearby residences or any other sensitive areas to note.

Facility Background/Regulatory Overview: Central Michigan Crematory is a crematory facility for human bodies. This facility operates 3 incinerators.

Central Michigan Crematory is considered a minor source of air emissions. This facility operates under General Permit to Install No. 161-00 and Permits to Install No. 228-09 and 128-12 for incinerators.

A *major source* has the potential to emit (PTE) of 100 tons per year (TPY) or more, of one of the criteria pollutants. *Criteria pollutants* are those for which a National Ambient Air Quality Standard exists, and include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns. It is also considered a minor area source for Hazardous Air Pollutants (HAPs), because it was not considered to have a PTE of 10 TPY or more for a single HAP, nor to have PTE of 25 TPY or more for combined HAPs.

Inspection:

Arrived: 12:30 PM

Departed: 1:30 PM

Weather: 38°F; NW wind at 5mph

Last Inspection: 8/04/10

Complaints: None

There were no visible emissions from the facility upon arrival. No odors were identified surrounding the complex.

Upon arrival the doors were locked, but eventually I was let in and showed my credentials to Bob Dingee, facility operator. Bob showed me around the facility and walked me through the crematory process. While there, I viewed the records of the charges that they are required by the permits to keep. Five cremations had been done so far on the day of my inspection.

Table 1-1: This table identifies the emission unit, description of the unit and the compliance status of the unit.

| No. | Emission Unit | Description | Comp. Status |
|-----|------------------|---------------------------------------------------------------------------|--------------|
| 1 | EUCREMATORY1 (G) | Natural gas incinerator associated with permit 161-00. Installed in 2000. | NC |
| 2 | EUCREMATORY2 (F) | Natural gas incinerator associated with permit 228-09. Installed in 2009. | NC |
| 3 | EUCREMATORY3 (D) | Natural gas incinerator associated with permit 128-12. Installed in 2012. | NC |

EUCREMATORY1 (Unit G): This unit is associated with the West stack. Unit F was operating at the time of my inspection. Temperature was at 1603°F, above the 1400°F as required in Permit 161-00.

EUCREMATORY2 (Unit F): This is the middle incinerator. This was operating at the time of my inspection and was at 1603°F, above the 1450°F as required by Permit 228-09.

EUCREMATORY3 (Unit D): This is the most recent installed incinerator that was installed in 2012. It is associated with the East stack. This unit was operating at the time of my inspection and was operating at a temperature of 1295°F. Bob indicated this was toward the end of the charge. Permit 128-12 indicates that EUCREMATORY3 shall not combust waste unless a minimum temperature of 1600°F is maintained throughout the charge. Therefore, this incinerator was operating out of compliance.

Recordkeeping:

1. I viewed the temperature readings that were currently being recorded, and I also viewed one from November 7th for Unit D that all met the necessary temperature requirements according to the associated permits. However, I was informed the day after my inspection by owner Mickey Brutsche that the temperature disc recordings have not been kept on file.
2. I reviewed the daily records of the time, description and weight of waste combusted in the incinerators.
3. Brutsche emailed me a copy of the latest maintenance performed on Unit F (228-09).

Concerns:

- Pen on the temperature disk chart of the middle incinerator, unit F, needs replacing.
- Violation 1: Permit No. 161-00 Special Condition (SC) III, *Records of the temperature in the secondary combustion chamber during operation shall be kept on file for a period of at least two years and made available to the Air Quality Division (AQD) upon request.*
- Violation 2: Permit No. 228-09 SC 6.3, *The permittee shall keep, in a satisfactory manner, secondary combustion chamber temperature records for EUCREMATORY2, as required by SC IV.1.*
- Violation 3: Permit No. 128-12 SC 6.3, *The permittee shall keep, in a satisfactory manner, secondary combustion chamber temperature records for EUCREMATORY3, as required by SC IV.1.*
- Violation 4: Permit No. 128-12 SC 3.1, *The permittee shall not combust waste in EUCREMATORY3 unless a minimum temperature of 1600°F and a minimum retention time of 1.0 seconds in the secondary combustion chamber are maintained.*
- Violation 5: Permit No. 128-12 SC 6.4, *The permittee shall keep, in a satisfactory manner, a record of all service, maintenance and equipment inspections for EUCREMATORY 3. The record shall include the description, reason, date and time of the service, maintenance or inspection.*

Summary: This facility is not in compliance with Permit Nos. 161-00, 228-09, or 128-12. A violation letter will be sent as a result of this inspection.

NAME Samira Brutsche

DATE 12/10/18

SUPERVISOR B.M.