



VN No. 1

12/12/18

Mr. Mickey Brutsche
Central Michigan Crematory
P.O. Box 1031
Battle Creek, MI 49016

SRN: N6843, Ingham County

Dear Mr. Brutsche:

VIOLATION NOTICE

On November 13th 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Central Michigan Crematory located at 455 N Mason St., Mason, Michigan. The purpose of this inspection was to determine Central Michigan Crematory's 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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 161-00, 228-09 and 128-12.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCREMATORY1 (G)	PTI 161-00 Special Condition (SC) 3	Failure to keep temperature records on file for minimum of 2 years.
EUCREMATORY2 (F)	PTI 228-09 SC 6.3	Failure to keep temperature records on file for minimum of 5 years.
EUCREMATORY3 (D)	PTI 128-12 SC 6.3	Failure to keep temperature records on file for minimum of 5 years.
EUCREMATORY3 (D)	PTI 128-12 SC 3.1	Failure to combust waste at a maintained minimum temperature of 1600°F.
EUCREMATORY3 (D)	PTI 128-12 SC 6.4	Failure to keep a record of all service, maintenance and equipment inspections.

- RECORDKEEPING/REPORTING.

During the inspection, Central Michigan Crematory was unable to produce the following records.

The conditions of PTI number 161-00 require maintenance of temperature records for the secondary combustion chamber for a minimum of 2 years. The conditions of PTI number 228-09 require maintenance of temperature records of the secondary combustion chamber for a minimum of 5 years. The conditions of PTI number 128-12 require maintenance of temperature records of the secondary combustion chamber and all service, maintenance and equipment inspections for a minimum of 5 years, which shall be made available for review upon request by the AQD staff.

This is a violation of the recordkeeping requirements specified in Special Condition 3 of PTI number 161-00, Special Condition 6.3 of PTI number 228-09, Special Condition 6.3 of PTI number 128-12 and Special Condition 6.4 of PTI 128-12.

- RULE 910: AIR CLEANING DEVICES

On November 13th, 2018, the AQD staff observed operation of EUCREMATORY3 while the secondary combustion chamber was not operating up to temperature outlined in PTI 128-12.

PTI 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. (R 336.1301, R 336.1331, R 336.1910)

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 2nd, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the DEQ, AQD, Lansing District, at 525 West Allegan Street P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Central Michigan Crematory 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 inspection of Central Michigan Crematory. 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,

A handwritten signature in cursive script that reads "Samantha Braman".

Samantha Braman
Environmental Quality Analyst
Air Quality Division
517-282-1373

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Brad Myott, DEQ